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Norwich to Tilbury

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Document: 8.4.1.2 Addendum to Applicant's Comments on Relevant
Representations - Part 2

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1. Introduction

1.1 Purpose of Document

- 1.1.1 This document has been produced in response to the Rule 17 letter issued by the Examining Authority (ExA) on 3 March 2026 **[PD-012]** and the follow up letter of 6 March **[PD-013]**.
- 1.1.2 The Rule 17 letter requested, in part, that the Applicant expand on its **8.4.1 Comments on Relevant Representations [REP1-132]** submitted at Deadline 1, in order to provide an individual detailed response to Relevant Representations (RRs) submitted by all statutory consultees not addressed in **[REP1-132]**, including Parish and Town Councils, and to also include Members of Parliament (MPs). This information was requested for Deadline 2.
- 1.1.3 The Applicant provided an initial tranche of detailed comments on Relevant Representations by statutory consultees and MPs at Deadline 2 in **8.4.1.1 Addendum to Applicant's Comments on Relevant Representations [REP2-025]**. This document provides a response to the RRs of the remaining statutory consultees and MPs. To avoid duplication, this document includes only those RRs to which the Applicant has not yet responded, and does not resubmit those responded to at Deadline 2.
- 1.1.4 As set out in **REP2-025**, this document does not respond to RRs by three Parish Councils, as their RR is the same or is materially the same but less detailed, than its Written Representation (WR) submitted at Deadline 1. These are Burstall Parish Council **[RR-0423]**, Holton St Mary Parish Council **[RR-1437]** and Offton and Willisham Parish Council **[RR-2767]**. The Applicant's response to those is provided in **8.8.1 Applicant's Comments on Written Representations [REP2-029]**.
- 1.1.5 The Applicant has additionally included two IPs who are not identified by the Planning Inspectorate as being statutory consultees but who we consider should be included: Royal Mail and the Essex Police and Suffolk Constabulary.

1.2 Structure of this Document

- 1.2.1 The Applicant's response to the individual RRs is set out in alphabetical order below, for ease of reference and to be consistent with the approach taken to selected organisations in the main **8.4.1 Comments on Relevant Representations [Revision B]**.
- 1.2.2 The responses utilise the Initial Assessment of Principle Issues (IAP) topics as identified by the ExA in order to categorise comments into topic themes. Where a comment is not reflected in an IAP topic, an additional topic theme may be used, or if it is general / overarching in nature and does not reflect a specific theme, 'N/A' may be used.

2. Comments on Relevant Representations

2.1 Adrian Ramsey MP

2.1.1 Table 2.1 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Adrian Ramsay MP **[RR-0033]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.1 Comments and National Grid's response

Topic	Comment	National Grid's response
Biodiversity, ecology and nature conservation	I wish to support the constituents of Waveney Valley who have concerns regarding the Norwich to Tilbury project. These concerns include: 1. The ecological impact of the present line, including the removal of trees and hedgerows, and the possibility that a different route might have less impact 2. Specifically, the impact on old woodland	The Applicant notes the respondent's comments. In relation to point 1: The Applicant has made all the efforts in establishing the baseline as part of the routing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the alignment presented in the DCO application, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the EIA process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period within the Waveney Valley and surrounding area. The findings of which informed the design and approach to mitigation. The scope and methodology of these ecology surveys was agreed in advance with relevant stakeholders, including the local planning authorities and Natural England to ensure a robust baseline was determined. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of

Topic	Comment	National Grid's response
		Construction Practice (Revision C) contain a list of relevant good practice and mitigation measures to avoid or reduce impacts on valuable habitats and species. 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] are based on a reasonable worst-case scenario of vegetation loss, including within the Waveney Valley, based on a standard overhead line design. Due to the nature of the Waveney Valley there is limited tree cover, and where woodland/tree cover is present this has been predominantly avoided where practicable. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised further as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. In relation to point 2: The Applicant is unclear where 'old woodland' noted in this comment is referring to. However large blocks of woodland within the Waveney Valley and surrounding area have been avoided by the Project. Any impacts on woodland have been captured within the ecological assessment and presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. There will be no significant residual effects on any woodland habitats.
Land Use	3. The impact on farmers and food production	6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] assumed that farming operations would not continue within construction areas. However, disruption to surrounding farming operations would be mitigated by implementing good practice measures. These include maintaining or providing alternative access to affected land parcels in communication with landowners and occupiers to allow for the continuation of surrounding farming operations, maintaining or providing alternative water supplies for livestock, and reinstating any land drains affected by the Project within the Order Limits. These measures form commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice (Revision C). In addition, effects on farming operations during

Topic	Comment	National Grid's response
		the construction phase would be managed through compensation agreements to allow landowners to claim for loss of income as a result of the Project (these agreements lie outside of the EIA process). 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] notes that all land required temporarily would be reinstated to its pre-construction condition, including Agricultural Land Classification grade with all works undertaken in accordance with good practice as set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. As such, once land has been returned and the required aftercare (period and associated activities) has been completed , pre-construction land use will be able to continue, including local food production.
Good Design	4. The proximity of pylons to homes in certain areas, e.g. Gislingham	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, including residential properties, through routeing and siting. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Two semi-detached properties in the Gislingham area meet the thresholds for inclusion in the RVAA. Table A13.4.3 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233] summarises the outcome of the assessment, noting that whilst the Project would be visible from windows and the gardens of both properties, it would not be the key defining feature of these views and as such further assessment was not triggered. Overall, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live.
Good Design	5. The proximity of the old and new pylon lines e.g. Mendlesham	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, including residential properties, through routeing and siting. The alignment has been routed to achieve some separation from the existing 400 kV overhead line, such that villages are not encircled by overhead lines to both sides. Separation is inevitably reduced in certain locations due to the presence of constraints to routeing and environmental features. Detailed assessment reported in the Environmental

Topic	Comment	National Grid's response
		Impact Assessment (EIA) identifies any measures considered to be necessary to reduce likely significant effects which would also consider the potential for effects potentially arising from close paralleling existing 132 kV overhead line and new 400 kV overhead line infrastructure. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Five properties in the Mendlesham area meet the thresholds for inclusion in the RVAA. Of these, four properties are anticipated to experience a medium magnitude of visual change, when considered in the round, and one property (Potters Farm) is expected to experience a high magnitude of visual change. However, overall, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live.
Health and Wellbeing	6. Electromagnetic fields around pylons which may harm human health e.g. Roydon	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing EMFs, which are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5. These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in the 7.8 Electric and Magnetic field Compliance Report [APP-330].
Safety and security	7. The vulnerability and security of the power supply and the possibility that pylons or the supply lines could be attacked	The applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and our Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across our Network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out. However, the Applicant can be clear that we have network arrangements that within

Topic	Comment	National Grid's response
		the DCO order limits can be utilised to manage and meet any immediate requirements associated CNI obligations.
Alternatives	8. The lack of exploration of alternative options	National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). If the same flexibility is to be achieved as the Applicant's proposal with a three ended connection from Norwich to Bramford to Tilbury, then as stated in paragraph 14.4.6 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357]: 'There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Consultation	9. The adequacy of consultation according to the Gunning principles	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP

Topic	Comment	National Grid's response
		project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Consultation	10. The lack of community consultation around community benefit	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ), 2025). In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance.
Land and property	11. The lack of reassurance received by local residents that their homes will not be significantly devalued	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaulieu-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that:

Topic	Comment	National Grid's response
		- House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauly-Denny power line. - Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Transport and Traffic	12. Highways issues – large vehicles will need to access sites via small roads which are not safe or appropriate for this use	The Applicant has developed a construction routeing strategy aimed at minimising the use of minor roads and prioritising the use of the Major and Strategic Road Network. Primary Access Routes (PARs), mainly on 'A' and 'B' roads, will be used to route construction traffic from the Major and Strategic Road Network to Site Access Points (SAPs) along the construction corridor. From these site access points, traffic will be routed off the public highway along temporary haul roads to access the construction sites. The Applicant has assessed the PARs for suitability for two-way HGV movements and has proposed a suite of highway mitigation measures, which are detailed in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP 312-320]. The Applicant has also produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail how the Applicant proposes to control and manage construction traffic along the local highway network and which set out the mitigation measures for impacts arising from the Project's construction traffic. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant will submit the detailed CTMP to the relevant planning authority for approval prior to the start of construction. The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity, fear and intimidation and road safety along all PARs. The findings of this assessment are presented within 6.16 Environmental Statement Chapter 16 - Traffic and Transport

Topic	Comment	National Grid's response
		[APP-271] and within 6.16.4 Appendix 4 Traffic and Transport Construction Effects [APP-275]. Within Norfolk and Suffolk, it was concluded that the residual construction effects were temporary and not significant when the mitigation and control measures presented within 7.3 Outline Construction Traffic Management Plan (Revision B) are applied.

2.2 Aldham Parish Council

- 2.2.1 Table 2.2 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Aldham Parish Council [RR-0065]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.2 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	This response is by Aldham Parish Council as the democratically elected representative body for the residents of the village of Aldham, Colchester Essex to protect their village from the harmful effects of National Grid's ("NG's") Norwich to Tilbury project.	Noted.
Historic Environment	The village lies between the River Colne and Roman River valleys. There are two main village areas: the formally designated Conservation Area of Fordstreet to the north and the village centre around the Church. There are many other scattered properties (mainly linked to old farmsteads) typical of ancient countryside. The number of listed properties in village numbers 27 a notably high percentage and all will be harmed by the project.	Conservation areas within 2 km of the Order Limits are considered in the historic environment assessment for the Project. Fordstreet Conservation Area is therefore included in the assessment, which considers both direct and indirect impacts. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment considers the potential impact on archaeology, historic buildings and historic landscapes and includes assessment of potential for physical impact and impact through change to setting that affects the value of a heritage asset. Regarding Fordstreet, both the construction and operation (and maintenance) phases of the Project are assessed to have a moderate adverse, and significant, effect on the conservation area. The assessment of conservation areas is supported by setting surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209 and REP1-063]. The details of the assessment of the 27 listed buildings in Fordstreet and Aldham are included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report

Topic	Comment	National Grid's response
		[APP-209 and REP1-063], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]. The Project has engaged with Historic England and relevant planning authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. The Project would not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project would not result in substantial harm to designated heritage assets, it would result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which provide that the Secretary of State would take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Landscape and Visual	Aldham is facing around 4.7km of pylons, some 2.61 % of Project length, and as proposed the pylon locations	The Applicant notes Aldham Parish Council concerns about the Project 'entrapping' Aldham and creating a 'wirescape'. Holford Rule 6 notes that <i>'in country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to</i>

Topic	Comment	National Grid's response
	dissect our village. The plans indicate Aldham will "host" 12 pylons. This is around 2.7% of the Project total. In addition the overhead lines (OH) between the pylons will entrap our village creating a wirescape across our landscape.	<i>avoid a concentration or 'wirescape'". A number of small wood pole lines will be removed to the north east and south of Aldham. There are no other high voltage lines that would combine with the Project to create a 'wirescape' in this location.</i> Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on landscape. NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. Perceptions of being encircled / surrounded when viewing the Project on maps are very different from the actual local context. Separation is inevitably reduced in certain locations due to the presence of constraints to routeing and environmental features. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Aldham are set out under Visual Receptor Area (VRA) D6 West Bergholt, Fordham Heath and Eight Ash Green (paragraphs 13.7.64 to 13.7.75) and VRA D7 Fordstreet and Aldham (paragraphs 13.7.76 to 13.7.87) in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Effects on landscape receptors within Aldham Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under LCA A5 Colne River Valley Slopes (paragraphs 13.3.543 to 13.3.558), LCA B4 Great Tey Farmland Plateau (paragraphs 13.3.573 to 13.3.588) and LCA B2 Easthorpe Farmland Plateau (paragraphs 13.3.589 to 13.3.603). Effects on residential visual amenity are considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA) which concluded that the Project would not breach the residential visual amenity threshold at any property. With regard to 'becoming encircled / surrounded

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		by overhead lines', the RVAA identified that the Project would not block the only available view from any property, nor would it be overwhelming in views in all directions from any property.
Historic Environment	The project impacts will not be limited to the overhead line route, so the impacts on the bordering environment and historical features are relevant.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Aldham. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment includes study areas beyond the Order Limits and considers the potential impact on archaeology, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072, AS-074 and AS-076] . Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078] . In addition to the proposals in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D) , 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Project has engaged with Historic England and relevant planning authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development.
Socio-economics, Recreation and Tourism	Our views and comments refer to the whole village area. This is a small village, with a population of 490, which tends to be stable and not migratory, so those who live here have a deep connection to their local environment. In the 2011 Census, Aldham recorded a	The Applicant notes the respondent's feedback. A review of the demographic data within the Wider Study Area, which includes Aldham, has been undertaken as part of the Socio-economics, Recreation and Tourism assessment and set out in Section 15.5 of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The baseline data has formed the baseline of the Environmental Statement (ES) assessment.

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	higher proportion of the population over 65 years old was 25%, this is significantly greater than the both the Colchester borough area and the national average of 16%. Residents spend a great deal of time in their village so will be more adversely affected and the construction phase will harm a large proportion of their remaining time with us.	
Landscape and Visual	The pylons enter the Parish at its northernmost boundary with the River Colne and the adjoining parish of Fordham. The overhead lines come in from Pylon TB049 with the last pylon in the Parish TB061 which is situated on rising ground from the river, making it prominent in views across the Roman River Valley from the north. 12 pylons of 45 m will dominate our village, particularly as it crosses two river valleys and the ridges between them	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project raised by Aldham Parish Council. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. Effects on landscape receptors in Aldham Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under LCA A5 Colne River Valley Slopes (paragraphs 13.3.543 to 13.3.558), LCA B4 Great Tey Farmland Plateau (paragraphs 13.3.573 to 13.3.588) and LCA B2 Easthorpe Farmland Plateau (paragraphs 13.3.589 to 13.3.603). The assessment of visual effects in relation to Aldham Parish is reported within Visual Receptor Areas (VRAs) D6 West Bergholt, Fordham Heath and Eight Ash Green (paragraphs 13.7.64 to 13.7.75), D7 Fordstreet and Aldham (paragraphs 13.7.76 to 13.7.87), D8 Great Tey (paragraphs 13.7.88 to 13.7.99) and D9 Marks Tey (paragraphs

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		13.7.100 to 13.7.111) as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation. Viewpoint assessment findings also identify significant and adverse visual effects. This includes views from Viewpoint 4.31 from Rectory Road near Hoe Farm, west of Aldham, which looks south towards the Roman Valley, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] from page 92. The assessment reports the visual effect at this viewpoint as moderate and significant (adverse).
Consultation	We are submitting our 2024 consultation response separately as this contains our detailed views but in summary our objections and concerns over National Grids proposals are as follows:	The Applicant's response to 2024 consultation feedback is provided in 5.1 Consultation Report [APP-066] .
Historic Environment	Heritage is a hugely significant aspect for Aldham. Of the 225 listed buildings along the entire length of the scoping corridor Aldham has a disproportional 19, or some 8%, of the buildings NG have identified in the Scoping Report, yet the 4.7km of corridor in our village (out of 180 total) is only 2.0% of the route length. In addition, there are a further 20 listed buildings in the village just outside the scoping corridor. This includes several Grade 1 Listed properties and the	The preliminary baseline information presented in the Scoping Report has been superseded by the detailed assessment presented in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of

Topic	Comment	National Grid's response
	Conservation Area of Fordstreet. We are clearly most disproportionately affected.	Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Biodiversity, ecology and nature conservation	Biodiversity: The Parish contains 10 Natural England Priority Habitats, five of which are affected by the proposed OH lines. All will be harmed by the proposed project	The potential impacts on priority habitats in Aldham, such as arable field margins, lowland mixed deciduous woodlands, ponds and hedgerows, have been presented within Page 40 of Figure A8.1.2 of 6.8.A1 Environmental Statement Appendix 8.1 - Habitat Report [AS-028] and 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Every effort has been made to reduce the impacts on priority habitats and features of high ecological value through careful routeing and siting. Within Aldham Parish the impacts on priority habitats have broadly been avoided. Where minor impacts remain, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) set out all ecological mitigation measures to be implemented and best practice measures to be followed. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on priority habitats anticipated.
Land Use	Business/Agriculture: Arable farming is the major land use currently but future cropping is likely to be very different to current agricultural practices. Irrigation will increase in response to climate change but	The Applicant has taken into consideration the location of existing land uses in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127], 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from

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	is incompatible with OHLs. New crops are emerging and the role of tree planting will increase. Pylons and overhead lines will prevent these being planted.	the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. The future baseline in respect of the construction timeframe is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and notes that given the extended timeframe required for changes to soil and land characteristics due to climate change to manifest (and for landowners to change practices as a result), the nature, extent and timeframe of any potential effects are impossible to predict with certainty. Decisions regarding future land use changes will need to take account of a multitude of factors (such as market changes) alongside any changes resulting from climate change.
Socio-economics, Recreation and Tourism	Several businesses in the village are based on tourism and leisure where the scenic nature of the village is key. These include boating, garden centres, cafes, Maize mazes, sunflower and pumpkin patches, and occasional hosting of forest schools, weddings, music events and other occasional exhibitions and walks. There is a renowned apple shop at Crapes farm while two of the farms also host shoots. Glamping and tourist accommodation are also available. All of these are	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] sets out the assessment of tourism economy and businesses. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. In addition, 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329] provide good practice and standard control measures to reduce and mitigate potential impacts and / or disruptions that may arise during the construction phase. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Aldham Parish Council in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].

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	present in our small village and all are predicated on the natural beauty and special character of the area and all will be harmed by the proposed pylons.	
Socio-economics, Recreation and Tourism	Public Rights of Way (PRoW): Aldham has an impressive 22 Public Rights of Way which includes one bridleway and a section of the Long Distance path The Essex Way. The Pylon proposals will close 8 out of the 19 footpaths, some 42% of paths. More damaging is that this represents over 52% of PRoW distance in the village some 7235 m out of the total 13636 m of PRoW. The pylons will be visible from EVERY one of the 19 PRoWs in the village so all 19 will be harmed and suffer a loss of amenity.	The Applicant notes Aldham Parish Council's concern regarding impacts on Public Rights of Way (PRoWs) in the Parish. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. In the vicinity of Aldham, Aldham Footpaths 3, 12, 18 and Bridleway 20 will require temporary diversions, during which users will be diverted around the perimeter of the relevant construction working areas. For the remainder of the period during which these PRoWs are affected by the Project, they will remain open on their existing alignment, with access managed as necessary in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Aldham Footpaths 4, 5, 7 and 15, as well as sections of the Essex Way on Fordham Footpaths 33 and 35, will all remain open on their existing alignments throughout construction, with access managed as required at points where they interact with construction activities, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Where managed access PRoWs intersect with working areas or haul roads, appropriate safety measures will be implemented to allow continued safe passage for PRoW users. This may include gated access of the PRoW or haul road or other appropriate measures, brief holding of users while a specific construction activity is paused or directing users safely around a localised working area where necessary. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan.

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		All PRoWs temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highways Authority, informed by pre- and post-construction surveys.
Alternatives	Mitigation: Pylon design pylon position screening and landscaping and undergrounding are theoretical mitigation measures but none are meaningful. There are now no other designs other than lattice and neither undergrounding or an integrated offshore route have been consulted on in a meaningful way	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant has considered a wide range of alternative means for meeting the Project need and set these out in the Corridor and Preliminary Routeing and Siting Study (CPRSS), published in support of the 2022 non-statutory consultation (7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), and the 2023 and 2024 Strategic Options Backcheck and Reviews (SOBR) (7.19 [APP-357] and within 7.17 [APP-355]), published in support of the 2023 non-statutory consultation and statutory consultation and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). We have also considered feedback relating to suggested alternatives and set out responses within the 2022 and 2023 non-statutory consultation, Statutory and Targeted Consultation Feedback Reports and elsewhere within this report. Our job is to carefully consider the most feasible options and present our proposals for public consultation. The Applicant cannot present an alternative for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem.
Alternatives	Alternatives: Aldham Parish Council needs to see a fully costed offshore route option presented. We know that pylons will harm our village irrevocably. We can see no	The Applicant notes the respondent's feedback. Construction costs are included in the overall estimated costs of each strategic option. This is set out in the 7.17 Strategic Options Backcheck and Review [APP-355] (2025 SOBR). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and regulatory framework. Where the costs of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. Throughout, the Applicant has engaged with the government

Topic	Comment	National Grid's response
	benefits at all to our village of this project.	and our regulators regarding policy and costs for new infrastructure. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project and are contained within the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). These alternative technologies included an offshore connection using Direct Current (DC) technology, and various onshore connection options including increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and Gas Insulated Line. Currently, overhead lines offer the most economic and efficient solution to transmit electricity over long distances. A full and transparent cost model is provided in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355] , which sets out in transparent detail how options appraisal costs were evaluated.
Good Design	Holford Rules: the Parish Council does not believe Rules 2, 3 4 or 5 are properly met. Our highest building is the Church and its spire - the pylons will be 50% higher than this. Aldham Church spire is clearly visible above the trees planted around it 161 years ago. No amount of tree planting will screen these proposed pylons. Alternative tower designs are no longer being proposed as T pylons are no longer an options. There are no meaningful mitigation measures being proposed by National Grid Gunning	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR)s published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Regarding consultation, the Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having

Topic	Comment	National Grid's response
	Principles: Consultations 1, and 2 and the Statutory Consultation all appeared to be predetermined and the staff at the events were only able to comment on the single option being presented i.e. pylons. This falls foul of the Gunning Principles, where meaningful options should be presented at a formative stage to allow the consultation to gather views on them and to enable NG to come to the correct conclusion.	regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Objection	We fully support the representations made by the Essex Suffolk and Norfolk Pylon Action Group. We are particularly grateful for their understanding and evaluation of the technical and legal aspects of this hugely complex set of proposals	Noted.
Consultation	[Aldham Parish Council document titled <i>'Representing The Residents of The Historic Essex Village of Aldham Essex. Response To National Grid's Statutory Consultation on The Great Grid Upgrade (Norwich to Tilbury) 2 July 2024'</i>]	The Applicant responded to statutory consultation feedback in the 5.1 Consultation Report [APP-066] and therefore does not provide further comment on the resubmission of this document.

2.3 Ardleigh Parish Council

Table 2.3 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Ardleigh Parish Council **[RR-0300]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.3 Comments and National Grid's response

Topic	Comment	National Grid's response
Relevant Representation Summary		
Good design	Ardleigh Parish Council (APC) strongly objects to the Norwich to Tilbury proposals due to the unacceptable, unnecessary, and avoidable harms arising from the siting of the East Anglia Connection Node (EACN) and associated overhead line, cabling, pylon arc and construction works within Ard last leigh.	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN1 (2024) and NPS EN5 there were alternatives considered that would avoid routeing through the National Landscape.
Alternatives	APC supports the principle of national grid reinforcement, but the current proposal is based on a flawed site-selection process, non-compliant consultation, and inadequate assessment of alternatives,	The Applicant disagrees with APC and confirms that it has completed a robust, evidence based and proportionate assessment leading to the Project submitted. We are clear that assertions about programme being less urgent do not reflect the regulatory and contractual position faced by the applicant and have set this out in our response to the Hiorns report commented on in various submissions, in particular at Issue Specific Hearing 1 as summarised in 8.5.3 Applicant's Written Summary of Oral

Topic	Comment	National Grid's response
	resulting in the worst possible outcome for Ardleigh. 1. Fundamental Failures in Site Selection National Grid has not carried out a robust, transparent or complete appraisal of alternative sites. Offshore integrated transmission solutions—such as coordinated offshore grid connections and subsea HVDC links—were not assessed despite National Grid's own published studies showing that offshore coordination is cheaper, more efficient, and reduces environmental and residential harm. Brownfield, coastal and industrial alternatives were not transparently examined. Only two inland sites were compared, and the dismissal of RAF Bovingdean was based on an unexplained "balance of considerations" without any technical evidence. APC maintains that this process is incomplete, irrational and inconsistent with EN-1 requirements to examine reasonable alternatives.	Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] and 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. We have set out the comparable costs for meeting the need case by different technologies and considered options on and offshore. These are set out in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. There are technical issues with the HVDC alternatives which include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems. The Applicant has developed the design to be consistent with policy (notably EN-1 and EN-5) and its regulatory circumstances. EN-5 requires the Applicant to operate in an efficient, coordinated and economical way. Inherent in this process has been the integration of routeing and siting drawing together the capability reinforcement and new connections aspects of the needs case. To meet the duty to build efficient and economic networks it also sets out that an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14

Topic	Comment	National Grid's response
		and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. The Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. Document 6.3 ES Chapter 3 Alternatives [APP-127] sets out the routeing and siting process and the alternatives covered
Consultation	2. Legally Defective Consultation (Gunning Principles) Both the Statutory and Targeted Consultations failed all four Gunning Principles. • Not at a formative stage: Key alternatives, including offshore and HVDC options, were withheld from consultation. • Insufficient information: Residents were not given the evidence needed to understand constraints, alternatives, heritage baselines, cumulative impacts or technical rationale.	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007].

Topic	Comment	National Grid's response
	Insufficient time and accessibility: No event was held in Ardleigh, and timeframes were inadequate for complex material.	
Historic Environment	No conscientious consideration: APC's evidence was ignored and, in one instance, a pylon (TB6) was moved closer to a Scheduled Monument after concerns were raised.	The Applicant listened and considered all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received during the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen and consider all feedback received, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, are set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122]. The Applicant has reviewed the assessment of the scheduled monument Cropmark site S of Ardleigh (1002146) in light of the comments. The Applicant is satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of moderate adverse significance of effect (construction phase) and of minor adverse significance of effect (operation phase) as well as in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of mid less than substantial harm (construction) and Lower Less Than Substantial Harm (operation), are appropriate. Where a mid-level less than substantial harm conclusion has been reached for the construction phase impacts in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], these impacts would

Topic	Comment	National Grid's response
		be temporary, and the construction related elements of the Project would be reinstated following completion of construction. It is not considered necessary to microsite all temporary elements of the works. However, 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. Changes to temporary construction works were considered as part of this.
Good Design Historic Environment	3. Breaches of Holford and Horlock Rules The proposals breach multiple established siting rules. - Holford Rule 3 is severely breached: 21 pylons, including 10 angle towers, create a large arc effectively encircling the village, dominating the skyline and damaging the setting of the Grade II* St Mary's Church, the Conservation Area, and multiple PRoWs. - The flat landscape offers no screening, causing "wirescape" across open countryside.	The Applicant's position is that the guidance provided by the Holford Rules has been integral to decision making. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering or breaching the Holford Rules. We consider environmental features and constraints, to inform the balance and define our proposals that we take forward, and which are also informed by feedback. This has been set out in the following documents over the progression of the Project 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]). The assessment of Ardsleigh conservation area (CA26) and associated heritage assets was informed by the conservation area appraisal and by site walkover and setting survey, as described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The assessment presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] takes these into account to provide an appropriate assessment in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS068].

Topic	Comment	National Grid's response
		The Applicant has reviewed the assessment of the conservation area and the St Mary's Church (1112060) in light of the respondent's comments. The Applicant agrees that the setting of both the conservation area and the church extends to the Order Limits. However, in line with established heritage guidance, the Applicant has considered all relevant factors and is satisfied that for both assets the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of minor adverse significance of effect and in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of lower less than substantial harm are appropriate. PRoW are not considered as part of the historic environment assessment, in accordance with the scope agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and through regular engagement with historic environment stakeholders throughout the pre-application stage of the Project. The Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] considers the effect of the Project on the visual amenity of people using PRoW. This is in accordance with the approach set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], which is in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and Clarification Notes. The LVIA does not consider PRoW as features in their own right. We note the concerns about the Project encircling the village of Ardleigh, dominating the skyline and causing wirescape. Holford Rule 6 notes that <i>'in country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.</i> Existing wood pole lines to the north of Ardleigh would be removed as part of the Project. The Applicant notes that a double overhead line was originally considered north of Ardleigh but following an iterative design and assessment process this was felt to be unacceptable. Therefore the Project design was changed to incorporate underground cable through the National Landscape and continued through to the EACN Substation. There are locations where pylons may be visible in multiple directions and this is acknowledged in the assessment of effects. Please refer to the response above for details of the visual effects identified in and around Ardleigh. The Applicant notes that

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		Viewpoint 3.11 PRoW north of Ardleigh (Ardleigh 2) is set out on page 112 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 2 of 4 [APP-230]. The assessment acknowledges the flat open landscape around Ardleigh, with sparse vegetation noted in some of the foreground and middle distance views, and therefore limited screening. The proposed overhead line would be clearly visible in open, unfiltered views to the northwest, north and east. It is considered there would be a major and significant (adverse) effect on views from the north of the village of Ardleigh.
Good Design	Horlock Rules are breached because the EACN is sited on greenfield land with high heritage and landscape sensitivity, adjacent to a Scheduled Monument, and in a location where cumulative industrialisation cannot be mitigated.	The Applicants position is that the guidance provided by the Horlock Rules has been integral to decision making. We would note that application of the Horlock Rules, as with the Holford Rules, typically involves balancing alternative solutions which can present conflicting This has been set out in document 7.18 2022 Corridor and Preliminary Routeing and Siting Study [APP-356] and the 2023 [APP-358] and 2024 [APP-359] Design Development Reports (DDR) and the 2025 5.15 Design Development Report [APP-122] published with the application for development consent, all set out how the Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Horlock Rules typically involves balancing alternative solutions which can present conflicting Horlock Rules compliance albeit that all aspects have been considered. From paragraph 6.5.8 of 5.15 Design Development Report [APP-122], The Applicant has set out its consideration of alternative locations for the EACN substation. This sets out the reasons for continuing to prefer the EACN substation location to the east of Ardleigh. This is due to the greater effects arising from the different combinations of substation siting and connection corridor presented by the alternatives. In particular the increased number of cable corridors to make the customer connections compared with the one corridor for the 400 kV requirement. An additional contributory factor is also noted in paragraph 6.5.21 of 5.15 Design Development Report [APP-122] to be programme (which is related to contractual and licence obligations) which is a legitimate consideration in the context of a Critical National Infrastructure Project where both the capacity and timing of delivery are key aspects of the Project need case.

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Landscape and Visual	4. Major Landscape, Heritage, Environmental and Agricultural Harm The scheme will cause irreversible loss of ancient hedgerows, wildlife corridors, woodland, and landscape character; harm multiple Local Wildlife Sites; degrade views into and within the Dedham Vale National Landscape; and affect a Scheduled Monument and extensive archaeology.	These matters are considered in turn: <i>i) Landscape and visual</i> Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term 'harm') on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect arising from infrastructure proposed outside the designated area. 'Harm' is not reported on in a Landscape and Visual Impact Assessment, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), as part of the Environmental Impact Assessment (EIA) process, but it is considered in the planning balance, given use of the term in the policy above. The purpose of a National Landscape is to '<i>conserve and enhance natural beauty</i>', as set out in the Countryside and Rights of Way Act 2000. The Special Qualities of Dedham Vale National Landscape (DVNL) explain the aspects of natural beauty which are important for this nationally protected landscape. When considering effects on Special Qualities, the long-term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute 'harm' to these Special Qualities. There will however be some significant visual effects on views looking outwards from the DVNL. The fact that the Project will be visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant (and so will not constitute 'harm'). Note that, in terms of indirect effects, the potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End compounds to the north of Raydon airfield and at Great Horkesley. In addition, there will be short to medium-term significant effects on the Special Qualities of DVNL during construction and after reinstatement, as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. This is because of the time it takes grassland to establish across disturbed areas, and for hedgerows and trees to grow.

Topic	Comment	National Grid's response
		6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The assessment was undertaken taking into consideration the Special Qualities, which describe which aspects of natural beauty are important in the DVNL. The assessment was also informed by a Position Statement from the Dedham Vale National Landscape Partnership. The Position Statement clarifies that: <i>'The National Landscape Partnership...considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in substantial impacts, positive or negative, on the natural beauty and special qualities of the AONB.'</i> [emphasis added]. It is considered (as informed by paragraph 5.10.34 of NPS EN-1 (2024)) that the reference to 'substantial' impacts here is taken as meaning the 'likely significant effects' identified through the EIA for the Project. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. Effects on visual receptors within Ardleigh parish are set out under Visual Receptor Areas (VRAs) C10 Dedham Heath and C12 Ardleigh in paragraphs 13.6.108 to 13.6.121 and paragraphs 13.6.138 to 13.6.150 in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Effects on landscape receptors within Ardleigh Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Bromley Heaths Landscape Character Area (LCA) in paragraphs 13.3.375 to 13.3.391 and Ardleigh Valley System LCA in paragraphs 13.3.392 to 13.3.406. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on Dedham Vale National Landscape (DVNL). The Project would result in significant adverse effects on some of the special qualities of the DVNL during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant, including on the landscapes associated with Constable and the historic villages.

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		ii) <i>Historic environment</i> The Applicant fully recognises the importance of safeguarding the historic environment including archaeological remains and designated heritage assets such as the scheduled monument Cropmark site S of Ardleigh (1002146). Our approach is aligned with this principle. The approach concerning the archaeological remains set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order (Revision C) already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation. Also, when the settings of designated assets fall partially within the Order Limits, such as the scheduled monument Cropmark site S of Ardleigh (1002146), it is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] on designated assets where land that forms part of the setting of designated assets falls within the Order Limits. The assessment has not concluded any substantial harm to heritage assets, although less than substantial harm has been identified as is common for many types of developments and should be considered in the context of the planning balance of the benefits of the Project. As the Project is classified as critical national priority as set out in section 4.2 of NPS EN-1 (2024) the Secretary of State will take as a starting point that CNP infrastructure will meet the test for public benefit that outweighs harm, even if substantial harm were identified, as set out in paragraph 4.2.15-17 of NPS EN-1 (2024). Descriptions of setting are detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. iii) <i>Biodiversity</i> The Applicant has sought to minimise impacts on hedgerows, woodland, local wildlife sites and wildlife corridors, through careful routeing, siting and detailed design through Ardleigh. The design has been informed by an understanding of the existing biodiversity

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		and ecological constraints, with avoidance prioritised wherever practicable and mitigation applied where impacts cannot be fully avoided. This iterative approach has helped reduce potential effects on ecological receptors. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] sets out the assessment of ecological effects, supported by extensive surveys undertaken between 2022 and 2025. Mitigation and good practice measures, including details on replacement planting, are secured through 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C). Although the mandatory requirement for 10 % BNG under the Environment Act 2021 is not yet in force for development consent schemes, the Applicant has voluntarily committed to delivering 10 % BNG with wider environmental and societal benefits for this Project in line with its corporate sustainability commitments.
Land Use	The construction corridor, haul roads and cabling will severely damage Best and Most Versatile agricultural land, farm operations, drainage systems and Ardleigh Reservoir's catchment.	The Applicant has taken into consideration the location of existing land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. The assessment of impacts on best and most versatile (BMV) land, including the extent of land required permanently and temporarily, is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys

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		the extent of each land grade within Ardleigh Parish (predominantly Grade 2 and Grade 3a, with a small extent of Grade 1 land). This includes a commitment to return land affected temporarily to the pre-construction condition, including Agricultural Land Classification grade. This would be achieved through the implementation of good practice soil management measures, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. The Applicant has also made several commitments to maintaining provision for land drainage, including agricultural drainage and irrigation systems. These are detailed in AS05 and W04 within the 7.2 Outline Code of Construction Practice (Revision C), as well as to safeguarding runoff patterns and the water quality of watercourses and waterbodies, including those within the catchment of Ardleigh Reservoir.
Planning Policy	5. Conflicts with the Development Plan The proposals fundamentally conflict with: • Ardleigh Neighbourhood Plan (2020–2033)—policies on landscape, heritage, biodiversity, rural character, tranquillity, rural lanes and community wellbeing; • Tendring District Local Plan—policies SP3, SP7, SPL3, PPL1–PPL4 and PP6. The project would	Pursuant to Section 104(3) of the Planning Act 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024). However, national planning policy in the form of the National Planning Policy Framework (NPPF) and local planning policy including the Tendring Local Plan and Ardleigh Neighbourhood Plan were taken into account as a material consideration. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies.

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	undermine the Parish's accepted spatial strategy.	
N/A	Conclusion and Request APC asks the Examining Authority to: • Recognise the flawed site-selection and consultation process; • Require National Grid to undertake a lawful reassessment of alternatives, including RAF Boxted and offshore grid options; • Remove the EACN and associated infrastructure from Ardleigh.	The Applicant acknowledges the requests made by Ardleigh PC to the ExA. The Applicant has responded to these points individually both above in relation to the RR summary and below in relation to the full RR.
Full Relevant Representation		
Needs Case	To be clear, APC understands and supports the need to expand the capacity of the grid network to ensure a sufficient and protected energy supply for the UK. However, APC strongly objects to the proposals before the Examining Authority, as the proposals fail to identify the best and least harmful approach to grid expansion.	The objectives of the Project are manifold and are set by statute, National Policy Statements (NPSs), statutory guidance and ministerial and other guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia identified in NPS EN-1 (2024) (see Sections 2 and 3) for economic, security, sustainability and affordability reasons and in a manner consistent with the provisions and guidance of NPS EN-5 in accordance with the Applicant's statutory duties. The alternatives considered and the reasons for their being discounted are set out above and are reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122]. NPS EN-1 makes it clear, in paragraph 4.3.22, that <i>'the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner;</i>

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		<i>and only alternatives that can meet the objectives of the proposed development need to be considered'.</i> Paragraph 4.3.23 of NPS EN-1 states, '<i>The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.</i>' These objectives, as they flow from the Applicant's statutory duty, have become the nation's objectives following the publishing of government statutory policy, in particular in NPS EN-5 (2024). The critical, urgent need for new transmission lines has become so much more than only grid capacity and the ways of providing it – the attention is now far more on the cost of not providing it in time.
Landscape and Visual	In particular, APC has real and evidenced concerns surrounding the adverse impacts of the proposals upon the Parish of Ardleigh and its setting and surroundings, and particularly, to the siting of the East Anglia Connection Node (EACN) and associated overhead line and cabling infrastructure.	Please refer to the response above for details of the landscape and visual effects identified in and around Ardleigh. The 7.15 Design and Access Statement [APP-353] (DAS) and the 7.20 2023 Design Development Report [APP-358], 7.21 2024 Design Development Report [APP-359] and 7.22 2025 Design Development Report Addendum [APP-360]) (DDR) are the primary documents referred to for information on the Project's approach to good design. Landscape and visual mitigation is proposed within 'Environmental Areas' at the proposed new East Anglia Connection Node (EACN) Substation and the seven CSE compounds. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) provides the site context for each of the permanent features and identifies the individual landscape mitigation proposals for the Environmental Areas. The 7.16 Design Approach for Site Specific Infrastructure [APP-354] discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detailed design stage, including at Ardleigh.
N/A	This representation summarises APC's position as set out in its responses to both the Statutory Consultation (July 2024) and the Targeted Consultation (March 2025) as its evidence base including the	This is noted. The Applicant has provided a response to feedback received during pre-application consultation exercises in the 5.1 Consultation Report [APP-066] . The inclusion of copies of these previous responses appended to the APC Relevant Representation, for the benefit of the ExA, is noted.

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	Ardleigh Neighbourhood Plan (2020–2033) and the Tendring District Local Plan. Copies of APC's responses to the July 2024 and March 2025 responses are appended to this Representation as there were not included in the document library and should be read in their entirety as part of APC's case for objecting. The Examining Authority has already received APC's Adequacy of Consultation Representation [AoC-024] and, again, this too forms part of APC's objection.	
N/A	APC is supported in its objection to these proposals by members of the local community, many of whom have contributed to a fund to assist with procuring expert representation for APC during the examination sessions. As at the date of submission of this document, £19,150 has been raised from approximately 50 households and businesses.	This is noted.
N.A	Ardleigh Parish Council objects to the Norwich–Tilbury proposals on the following principal grounds:	The Applicant acknowledges these points, which are responded to in detail in the rows above and therefore not duplicated here.

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	1. The site-selection process for the EACN is fundamentally flawed, incomplete and inadequately evidenced, including failure to consider lower-cost offshore integrated options including failure to consider lower-cost offshore integrated options 2. The statutory and targeted consultations failed compliance with the Gunning Principles and did not allow meaningful public engagement. 3. The proposals breach multiple Holford and Horlock Rules, especially Holford Rule 3, due to the pylon arc and multiple angle towers encircling the village 4. The scheme directly conflicts with the Ardleigh Neighbourhood Plan (2020–2033) and multiple policies of the Tendring District Local Plan, undermining the adopted local spatial strategy. 5. Ardleigh is the wrong location for the EACN, given	

Topic	Comment	National Grid's response
	its exceptional constraints, heritage designations, landscape sensitivities and proximity to the Dedham Vale National Landscape.	
Cumulative Effects	6. The cumulative impact of the EACN, multiple windfarm substations, converter stations, pylons and cable swathes would cause unprecedented and irreversible harm to the parish:	Ardleigh Parish is within Tendring District and is located within Section C of the Project. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. A Stage 5 inter-project cumulative effects assessment is presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. The Stage 5 assessment considers the impact of clusters of multiple other developments with the Project on a specific area or receptor. The assessment looked at where two or more other developments identified in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] could affect a common receptor (e.g. Landscape Character Area/Landscape Character Type or Visual Receptor Area or the National Landscape) with the Project. Some developments have been identified since Development Consent Order submission, (post-April 2025 list). The Project will consider the potential for significant cumulative effects from the new developments identified and will update and submit into the Examination the Stage 4 and Stage 5 inter-project cumulative effects assessment conclusions reported in the Environmental Statement where additional significant effects are identified. The inter-cumulative assessment concludes that in Tendring, overall, negligible and not significant effects would be expected in relation to socio-economics, recreation and tourism, ecology and biodiversity, contaminated land, geology and hydrogeology, hydrology, flood risk and land drainage, health and wellbeing and historic environment, noise and vibration, and air quality. moderate adverse and significant could not be ruled out in relation to construction effects for landscape and visual, and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.

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Traffic and Transport	Traffic impacts during construction – in terms of road closures, diversions	7.3 Outline Construction Traffic Management Plan (Revision B) manages the impacts arising from temporary road closures that are required, including the provision of diversion routes where appropriate. Short term road closures associated with overhead line stringing, construction of highway mitigation works, construction of bellmouth junctions and the open-cut cable swathe are expected on some of the roads. The Applicant proposes a long-term road closure of Wymondham Road in Norfolk for longer than 18 months. Details of these road closures are presented within Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B). It is anticipated that the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. Schedule 7 and Schedule 8 of 3.1 Draft Development Consent Order (Revision C) provide locations of the Streets and PRowS to be temporarily closed and Permanently Stopped Up and details of the proposed diversion routes. Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] it was concluded that full short-term temporary road closures are expected to be for no more than four weeks and would require a diversion using the same standard of road, or higher where practicable and available. Given the measures detailed within Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) the residual construction effects on driver/public passenger delay were therefore deemed minor and not significant.
Traffic and Transport	The temporary and/or new roads have not been considered and will despoil the character of the rural lanes	7.2 Outline Code of Construction Practice (Revision C) (CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06

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		and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through CoCP Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).
Traffic and Transport	• impact on the current main traffic routes.	The construction vehicle routing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). This highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project. The Applicant has undertaken a complete and full assessment of all roads forming the Primary Access Routes (PARs) to be used by construction vehicles for the Project and other committed developments. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 6.16.4 Appendix 4 Traffic and Transport Construction Effects [APP-275] presents the findings of the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on pedestrians, cyclists and horse-riders on all roads along PARs located on the local road network. Within and near to Ardleigh Parish, this includes Old Ipswich Road (PAR 33), the short sections of Wick Lane (PAR 32) and Ardleigh Road/Little Bromley Road (PAR 31), and

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		Bentley Road (PAR 30). It was concluded that the construction residual effects would be minor and not significant when taking into account the mitigation measures set out within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). 7.11 Transport Assessment [APP-333] submitted with the Development Consent Order (DCO) application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. The findings of junction modelling is presented within Section 7.11 of 7.11 Transport Assessment [APP-333]. This includes the A120 Harwich Road / Bentley Road priority junction (Site 39) and the A120 Ardleigh Crown Interchange (Site 38). Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts.
Traffic and Transport	There are not viable diversionary roads around the area due to the size and location of back roads, many of which are single width lanes.	The Construction Routeing Strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B) and has been developed to manage the impact of construction vehicles on the Public Highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. An assessment of the suitability of each Primary Access Route was completed prior to prescribing each route to be used for HGV movements. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within 7.3 Outline Construction Traffic Management Plan (Revision B) which is secured through Requirement 4 of the 3.1 Draft Development Consent Order (Revision C). The Project also requires the transportation of Abnormal Indivisible Loads (AIL). The Applicant has developed specific routing proposals for AIL movements and these have been developed with engagement by the relevant stakeholders including the Local Highway Authorities and National Highways. Details about these movements are submitted in support of the Development Consent Order (DCO) application in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310].
Noise and Vibration	Noise from pylons has not been addressed.	Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in

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		consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the ES (Volume 6 of the DCO application), in accordance with 6.20 Scoping Opinion [APP-297], on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261], which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers, and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions.
Noise and Vibration	• Cumulative noise impact has not been accounted for during the construction phases.	It is assumed that the comment relates to the cumulative effects of the Norwich to Tilbury, North Falls, and Five Estuaries projects. Cumulative noise effects are presented in ES Appendix 17.3 – Inter-Project Cumulative Effects. The assessment concludes that cumulative effects from noise and vibration from multiple projects is not expected where each individual project employs best practicable means to reduce their individual construction noise effects.
Alternatives	7. Viable alternative solutions, including offshore grid connections and brownfield land options, were not properly assessed or presented for consultation.	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it

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		proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.
Alternatives	2. Failure of Site Selection – Ardleigh Is an Inappropriate Location APC maintains that National Grid has not undertaken a credible, complete, or transparent site selection process. Several technically viable and lower-impact alternatives were not assessed or were dismissed without evidence. 2.1 Failure to consider an integrated undersea/offshore grid option—despite National Grid's own evidence that it would save money National Grid has publicly acknowledged, through the Offshore Transmission Network Feasibility Study" (OTNFS), 2011 and in July 2022, under the framework of the ongoing Offshore Transmission Network Review (OTNR), National Grid ESO published the "Pathway to 2030 Holistic Network Design (HND)". and multiple Network Options Assessments, that an	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.

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	integrated offshore transmission network would: • reduce total system cost by billions of pounds • minimise reliance on inland substations like the EACN • reduce the need for new pylon corridors • limit environmental, heritage and residential impacts • enable faster, strategic decarbonisation 2011 Report The primary 2011 report is the "Offshore Transmission Network Feasibility Study" (OTNFS), published jointly by National Grid and The Crown Estate. This study was a foundational analysis for developing a coordinated approach for future offshore wind connections (specifically for the Round 3 wind farms). • Key finding: The report concluded that a coordinated design approach could achieve potential savings for the GB consumer of between £2.4bn and £5.6bn compared to a purely radial	

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	solution. A separate report for Ofgem based on this work found potential capital expenditure savings of between 8% and 16%. 2022 Report In July 2022, under the framework of the ongoing Offshore Transmission Network Review (OTNR), National Grid ESO published the "Pathway to 2030 Holistic Network Design (HND)". Context: The HND report is the key document from 2022 that presents a specific recommended network design for the connection of 23GW of offshore wind by 2030, moving from a piecemeal to a more coordinated approach. While the HND itself is a design plan, the analysis that underpins it stems from the earlier "Offshore Coordination Phase 1 Final Report" from December 2020. This earlier report laid out the main cost benefit analysis for coordination.	

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	- Key finding (from the supporting analysis): The 2020 analysis, which informed the HND, projected that an integrated approach for all future projects could save consumers approximately £6 billion (or 18%) in capital and operating expenditure by 2050. It also projected a potential 50% reduction in the amount of new grid infrastructure (cables and landing points) required compared to a purely radial approach. Despite National Grid's own findings that offshore integration is cheaper, more efficient, and less harmful, the Norwich–Tilbury project: - does not assess an integrated offshore option - does not provide a cost comparison - does not explain why a cheaper offshore option was excluded - forces an unnecessarily complex, expensive inland solution	

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	This omission is a critical flaw. It results in the EACN being placed in Ardreigh only because lower cost, lower-harm options were not examined, contrary to National Grid's own published analysis.	
Alternatives	2.2 Failure to assess brownfield, coastal, or industrial alternatives National Grid has provided no transparent comparison of: • coastal brownfield sites • industrial land near windfarm landfall • sites closer to the Norwich–Tilbury route • locations benefitting from existing grid infrastructure Instead, a heavily constrained rural village has been selected without justification.	The Applicant set out a rigorous and robust process for the EACN siting in document 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022. This identified a large number of potential sites which were narrowed down to a number of zones (in some cases zones combined individual sites). The site was then selected following feedback and review of other sites suggested in feedback. This has been reported in the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]). It is not required, appropriate or efficient to develop a comparison of all sites at a common level of detail to make decisions. For example we do not need to develop a more detailed understanding of all aspects of a site closer to the coast because we can rapidly establish that it is less preferred because of the additional parallel overhead line infrastructure. Other alternatives can similarly be differentiated in what is a reasonable and proportionate approach.
Alternatives	2.3 Inadequate appraisal of alternative sites near the main Pylon Route Only two sites were considered for the siting of the EACN Ardreigh and the former RAF Boxted.	The Applicant disagrees with the response and has set out why the suggested alternative to the west of the A12 is less preferred. This is set out in 5.15 Design Development Report [APP-122] from paragraph 6.5.8 with the conclusion at paragraph 6.5.21 noting 'multiple aspects of uncertainty and construction risk, along with a reduction in future flexibility and increased risks to programme....'

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	Although it is not for APC to advocate that the EACN is located at RAF Boxted it does demonstrate the inadequacy of the assessment as RAF Boxted is: • close to the A12 • adjacent to existing energy and transport corridors • significantly closer to the core alignment It was dismissed on vague 'balance of considerations' without technical evidence. How did the 'on balance' view decide on the Ardreigh site? APC understands that Tendring District Council also challenges this dismissal.	
Alternatives	2.4 Failure to follow the established site-selection hierarchy Best practice for energy NSIPs requires: 1. Considering offshore and HVDC subsea options 2. Selecting brownfield or industrial sites first 3. Only considering rural greenfield sites as a last resort	This simple characterisation misrepresents the process followed by the Applicant. The Applicants process has been robust, evidence based and comprehensive in its considerations.

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	In settling on its proposal, National Grid has reversed this hierarchy.	
Alternatives	2.5 Conclusion on Site-Selection Failure Because National Grid: • ignored offshore options it previously said would save money • failed to examine brownfield and coastal alternatives • dismissed local alternatives without justification • did not follow the siting hierarchy we can only conclude that the choice of Ardleigh for the EACN is unjustified and unsound.	Please see rows above which respond to these points.
Consultation	3. Consultation Failures – Breach of Gunning Principles APC's assessment concludes that both the statutory and targeted consultations contravened established consultation law: Gunning 1 – Consultation at a formative stage Alternative options (including offshore grid, HVDC subsea, alternative landfalls and	Please see rows above which respond to these points.

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	brownfield sites) were withheld from consultation, meaning the public could not influence fundamental decisions. Gunning 2 – Sufficient information Critical environmental, archaeological, heritage and cumulative impact information was missing or incomplete. Maps and documents were very difficult for ordinary people to access and understand. Document indices are often in technical language with links not working as expected. It is necessary to trawl through them separately. Gunning 3 – Adequate time The Targeted Consultation allowed insufficient time for residents and stakeholders to understand and respond to complex new proposals affecting hundreds of hectares. Gunning 4 – Conscientious consideration Evidence supplied by APC, including on heritage and landscape harm, was not reflected in subsequent design revisions. Notably, pylon TB6 was moved closer to a	

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	Scheduled Monument after APC raised concerns about potential harm to the site.	
Good Design	4. Breaches of the Holford and Horlock Siting Rules The Holford and Horlock Rules constitute the nationally recognised method for assessing overhead line and substation siting. National Grid's proposals in Ardleigh breach these rules extensively, especially Holford Rule 3, which is breached in the most severe manner possible. 4.1 Holford Rules – Summary of Breaches Rule 1 – Avoid major areas of highest amenity value Breach: Line intrudes into the setting of the Dedham Vale National Landscape, the Ardleigh Conservation Area and a Scheduled Monument. Rule 2 – Avoid smaller high-amenity areas or deviate to protect them Breach: Direct impact on Local Wildlife Sites, ancient hedgerows and heritage settings.	The Applicant disagrees that the Holford Rules have not been considered or are breached extensively. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering or breaching the Holford Rules. Detailed siting and routeing was informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision making is required to consider the different combinations of effects and consequences. In the case of TB1 to TB21 there are clear reasons (technical constraints, presence of minerals site, reservoir) why certain sections must be retained as overhead line. The routeing is then responsive to the presence of homes, constraints and environmental features that are present in a context that..

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	Rule 3 – Choose the most direct line with few angle towers Severe fundamental breach. The Ardleigh alignment violates Rule 3 in multiple ways: Breach 1: Pylons wrapped around the village More than 10 pylons (TB001–TB021) form a sweeping arc around Ardleigh, resembling a semi-circle of industrial structures enclosing the village. 10 of these pylons would be angle towers. Of the 21 pylons planned for the village only 8 would be the “standard” suspension pylons. Breach 2: Multiple angle towers in succession Rule 3 discourages angle towers due to their size and prominence. The Ardleigh design uses multiple angle towers, amplifying skyline intrusion. Breach 3: Long sections across flat land Rule 3 warns explicitly that long runs in flat landscapes cause strong visual intrusion. Ardleigh's open topography	

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	makes the pylon corridor visible from every direction. Breach 4: Domination and encirclement of a rural settlement Holford guidance requires avoiding routes that dominate or pass close to villages. The proposals encircle Ardleigh, an outcome entirely contrary to the purpose of Rule 3. This includes encirclement of the landmark Grade II* listed St. Mary's Church, Ardleigh (1112060) and the Ardleigh Conservation Area (CA26). This will also have a permanent impact on PROWs in the village. Rule 4 – Use tree or hill backgrounds Breach: Ardleigh offers no such screening. Pylons stand against open sky. Rule 5 – Prefer wooded valleys Breach: Proposals cut across open farmland, increasing visibility. Rule 6 – Avoid “wirescape” in flat, sparsely treed areas Breach: Twenty-one pylons, substations, overhead lines and	

Topic	Comment	National Grid's response
	cable swathes create a significant wirescape across Ardleigh. Rule 7 – Approach urban areas via industrial zones; consider undergrounding Breach: The approach is through rural land, and undergrounding/offshore alternatives were not meaningfully assessed.	
Good Design	4.2 Horlock Rules – Summary of Breaches The Horlock Rules require: • avoiding high-amenity landscapes • taking advantage of natural landform and vegetation • minimising visual impact on settlements • avoiding cumulative industrialisation • ensuring overhead line connections can be sensitively integrated Breaches in Ardleigh: • The EACN is placed in flat, open countryside with no screening. • It lies near a Conservation Area, Scheduled	The Applicant disagrees that the Horlock Rules have not been considered. 7.18 2022 Corridor and Preliminary Routeing and Siting Study [APP-356] and the 2023 [APP-358] and 2024 [APP-359] Design Development Reports (DDR) (available on the Project website) and the 2025 5.15 Design Development Report [APP-122] published with the application for development consent, all set out how the Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Horlock Rules typically involves balancing alternative solutions which can present conflicting Horlock Rules compliance albeit that all aspects have been considered.

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	Monument, Listed Buildings, and Local Wildlife Sites. - The cumulative impact of the EACN, Five Estuaries, North Falls, Tarchon converter station and 21 pylons is extreme and cannot be reconciled with Horlock principles. Horlock compliance is impossible at this site. 4.3 Conclusion on Non-Compliance with Holford and Horlock These proposals: - severely breach Holford Rule 3, - breach Rules 1, 2, 4, 5, 6 and 7, - and violate nearly all Horlock siting principles. The Examining Authority should give significant weight to these breaches, which show that Ardleigh is unequivocally the wrong location.	
Planning Policy	5. Conflicts With the Ardleigh Neighbourhood Plan and Tendring Local Plan	Pursuant to Section 104(3) of the Planning Act 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024).

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	5.1 Conflict with the Ardleigh Neighbourhood Plan (2020–2033) The Ardleigh Neighbourhood Plan (2023) forms part of the statutory development plan and carries full weight in decision-making. The following policies are particularly relevant: • GDP (General Approach to Development), which expects development outside defined settlement boundaries to be appropriate in scale and impact to its location and context. • EP (Natural, Built & Historic Environment), which requires new development to be of high-quality design that reflects the local character, avoids urbanising effects, prevents light and noise pollution in tranquil rural areas, and protects important landscape features. • TP (Transport and Parking), which resists development that would have an unacceptable impact on highway safety or result in	However, national planning policy in the form of the National Planning Policy Framework (NPPF) and local planning policy including the Tendring Local Plan and Ardleigh Neighbourhood Plan were taken into account as a material consideration. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. The analysis of planning policy compliance demonstrates that the need for the Project is supported by national planning policy and other national energy and environmental policy, and that the Project addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable. In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in as described at Paragraph 4.1.7 of NPS EN-1 (DESNZ, 2024) sets out that for CNP Infrastructure that '<i>... the need case will outweigh residual effects in all but the most exceptional circumstances</i>'. It considered that the residual effects reported in the ES are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.

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	severe residual cumulative impacts on the local road network. The Neighbourhood Plan—developed through extensive consultation and now forming part of the Development Plan—prioritises: • preserving rural character and tranquillity • protecting Local Green Spaces • safeguarding heritage and settlement pattern • conserving hedgerows, woodland and biodiversity • avoiding intrusive development The Norwich–Tilbury scheme directly undermines these objectives and would permanently negate years of community-led planning.	
Planning Policy	5.2 Conflict with the Tendring District Local Plan The Local Plan identifies Ardleigh as a Small Rural Settlement where only modest, sustainable development is appropriate. Major industrial-	Pursuant to Section 104(3) of the Planning Act 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024). However, national planning policy in the form of the National Planning Policy Framework (NPPF) and local planning policy including the Tendring Local Plan and Ardleigh Neighbourhood Plan were taken into account as a material consideration.

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	scale energy infrastructure is incompatible with: • policies on landscape protection • heritage conservation • agricultural land safeguarding • rural settlement character	5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. The analysis of planning policy compliance demonstrates that the need for the Project is supported by national planning policy and other national energy and environmental policy, and that the Project addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable. In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in as described at Paragraph 4.1.7 of NPS EN-1 (DESNZ, 2024) sets out that for CNP Infrastructure that '<i>... the need case will outweigh residual effects in all but the most exceptional circumstances</i>'. It considered that the residual effects reported in the ES are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.
Biodiversity, ecology and nature conservation	APC's submitted evidence demonstrates that the scheme would cause: • irreversible destruction of ancient hedgerows, woodlands	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including hedgerows and woodlands. The design process has taken account of existing biodiversity, the natural environment and, where practicable, seeks to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors (which includes hedgerows and woodland). As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys were undertaken, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats. The Applicant has committed to delivering 10% BNG with environmental and societal benefits on the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].

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Biodiversity, ecology and nature conservation	harm to multiple Local Wildlife Sites and irreplaceable habitats	Through routeing, siting and design development, the Applicant has sought to avoid or if unavoidable reduce, as far as practicable, impacts on biodiversity and in particular features of high ecological value, such as local wildlife sites and irreplaceable habitats within Ardleigh. Potential direct and indirect impacts on ecological designated sites and irreplaceable habitats within the Study Area have been considered within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on designated sites and include specific mitigation measures as appropriate to ensure no significant residual effects. A bespoke mitigation strategy for irreplaceable habitats (ancient woodland and veteran trees) has been prepared which details the potential impact and appropriate detailed mitigation measures, this is presented within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].
Biodiversity, ecology and nature conservation	major impacts on migratory birds and bat populations	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity, including on migratory birds and foraging/commuting bats. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity including birds and bats and their associated habitats, through avoidance or mitigation. The key impacts that may arise from bird migration patterns is the potential for collision with new overhead lines. Collision risk has been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016) guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records have been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries

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		/ coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at Ardleigh Reservoir as detailed in 7.4 Outline Landscape and Ecological Management Plan (Revision D). A detailed bat activity survey has been undertaken across the Project as set out within 6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [APP-172]. Artificial bat flyways are proposed at key locations where the survey data has indicated a high usage feature by foraging/commuting bats, to ensure connectivity is maintained during construction. The approach to bat commuting/foraging mitigation and the proposed locations for the bat flyways, has been agreed with the Local Planning Authorities through consultation on the 7.4 Outline Landscape and Ecological Management Plan (Revision D).
Landscape and visual	serious degradation of views within and toward the Dedham Vale National Landscape	6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on Dedham Vale National Landscape (DVNL). The Project has been designed to minimise effects on Dedham Vale National Landscape; including consideration of the Project within the National Landscape and its setting. While there will be significant effects during construction, these will reduce and be not significant during operation.
Historic Environment	harm to a Scheduled Monument and numerous non-designated archaeological assets of high potential significance	The Applicant has reviewed the assessment of the scheduled monument Cropmark site S of Ardleigh (1002146) in light of the comments. In line with established heritage guidance, the Applicant has considered all relevant factors and concluded that the Project would only be occasionally visible from the scheduled monument. Therefore, due to the overall distance, the Applicant is satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of moderate adverse significance of effect (construction phase) and of minor adverse significance of effect (operation phase) as well as in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of mid less than substantial harm (construction) and Lower Less Than Substantial Harm (operation), are appropriate. Also, The Applicant fully recognises the importance of safeguarding archaeological remains such as the non-designated archaeological assets in the Ardleigh area, and our

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		approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order (Revision C) already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified. 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Projects likely significant effects on designated (including scheduled monuments) and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-85] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Water Environment	The proposals could also jeopardise Ardleigh Reservoir (a major drinking water source)	The Applicant acknowledges that the Project crosses Ardleigh Reservoir. The reservoir is a receptor included in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and the chapter acknowledges that the reservoir is

Topic	Comment	National Grid's response
		a water supply source. A suite of measures will be in place to safeguard Ardleigh Reservoir and these are detailed in 7.2 Outline Code of Construction Practice (Revision C). With these measures in place, there would be no significant effects on the reservoir. The Applicant acknowledges that the settings of some designated assets within Ardleigh such as listed buildings and the conservation area (CA26) fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets within Ardleigh.
Historic Environment	The proposals could also jeopardise [...] the settings of Listed Buildings, the Conservation Area, and the historic settlement form.	The Applicant acknowledges that the settings of some designated assets within Ardleigh fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets within Ardleigh.
Water Environment	N2T construction could affect water supply, irrigation & Ardleigh Reservoir in the following ways • Heavy machinery, trenching and soil compaction could	The Applicant acknowledges that the Project crosses Ardleigh Reservoir. The reservoir is a receptor included in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and the chapter acknowledges that the reservoir is a water supply source. The potential ways by which the Project could impact water environment receptors, such as the reservoir, is considered within the assessment documented in this chapter. A suite of measures will be in place to safeguard Ardleigh Reservoir and these are detailed in 7.2 Outline Code of Construction Practice

Topic	Comment	National Grid's response
	damage drainage systems and reduce natural water flow to fields and boreholes. - Disturbed ground and divided fields could disrupt irrigation infrastructure, making systems harder to operate and less reliable. - Damage to boreholes or the water table could reduce available irrigation water during key growing periods. - Removal of hedgerows and large-scale soil disturbance would increase run-off and erosion, sending silt and debris toward watercourses feeding the reservoir. - Increased sediment, dust and possible construction pollutants could lower Ardleigh Reservoir's water quality and raise treatment needs.	(Revision C). With these measures in place, there would be no significant effects on the reservoir. Commitment W04 in 7.2 Outline Code of Construction Practice (Revision C) addresses the measures that will be in place with respect to private water supplies and irrigation pipes. A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The Drainage Strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled. As per commitment W14 in 7.2 Outline Code of Construction Practice (Revision C), replacement drainage schemes will be installed where appropriate once the Project has been constructed. Appendix C: Outline Soil Resource Plan of the 7.2 Outline Code of Construction Practice (Revision C) details soil handling during construction in line with good practice measures, to ensure the protection of soil resources.
Water Environment	Overall, N2T construction could weaken Ardleigh's irrigation capacity, reduce reliable water supply to farms, and increase sediment and pollutant run-off into Ardleigh Reservoir. This combination threatens both agricultural productivity and the	Ardleigh Reservoir is one of the receptors included in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]. The Project has secured a suite of measures to safeguard the reservoir during construction, and these are described in 7.2 Outline Code of Construction Practice (Revision C). With these measures in place, there would be no significant effects on the reservoir. These measures include construction practices and preventive measures to reduce the risk of sediment runoff and pollution to waterbodies such as Ardleigh Reservoir.

Topic	Comment	National Grid's response
	quality of a key local water source.	As per commitment W04 in 7.2 Outline Code of Construction Practice (Revision C) , "Irrigation pipes will be avoided where practicable or alternative supplies will be provided where temporary interactions are unavoidable".
Landscape and Visual	7. Severe and Unacceptable Cumulative Impacts National Grid assumes that the following will be co-located around the EACN: • EACN substation (c. 42ha) • Five Estuaries substation (c. 20ha) • North Falls substation (c. 20ha) • Tarchon converter station (dimensions currently not known) • 19 × 50m pylons, 2 x 60m pylons with Haul roads • 4.5 Km of Underground cabling swathes and access roads up to 220m wide The affected area exceeds 275 hectares, representing more than 15% of Ardleigh's unprotected land and fundamentally altering the parish's identity. This cumulative industrialisation of a rural landscape is unprecedented and unacceptable.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with the 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. Inter-project cumulative effects with Five Estuaries and North Falls are considered in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and no traffic information is yet available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application. The Landscape and Visual Impact Assessment (LVIA) included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] considers the effects of all aspects of the Project, as set out in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].

Topic	Comment	National Grid's response
Land Use	8. Harm to Agriculture and Rural Economy Ardreigh is a largely agricultural parish characterised by Best and Most Versatile (BMV) Grade 1 land, enabling high-value food production that supports both local businesses and the wider UK supply chain. The National Grid's proposed Norwich–Tilbury (N2T) route poses significant risks to this landscape, its farmers, and its established rural economy. • Ardreigh's BMV Grade 1 land is among the most productive in the UK, yielding essential crops and supporting long-standing family farms. • Typical local production includes soft fruits (raspberries, strawberries, blueberries and asparagus), cereal crops, hay, and livestock grazing on mixed farming units. • The N2T proposals—50m pylons, haul roads, trenching, and substations—would remove or degrade large areas of high-quality farmland.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys the extent of each land grade within Ardreigh Parish (predominantly Grade 2 and Grade 3a, with a small extent of Grade 1 land within the Order limits in Ardreigh Parish). 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] includes a commitment to return land affected temporarily to the pre-construction condition, including Agricultural Land Classification grade. This would be achieved through the implementation of good practice soil management measures, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven, and this would include any financial impacts on existing environmental stewardship schemes should they occur. Particular agricultural matters can also be addressed through voluntary land agreements. Food security in the UK is a multi-faceted issue, shaped by domestic production capabilities, import dependencies, land use patterns (including landowner/manager decisions and preferences), and environmental challenges. The extent of Utilised

Topic	Comment	National Grid's response
	- Dust contamination threatens sensitive crops such as soft fruit, which cannot be washed before sale. - Soil compaction, erosion, and long-term damage to drainage systems would reduce crop yields, with evidence of 20% sustained loss where undergrounding has occurred historically. - Divided fields and construction routes would hinder the use of modern machinery, reduce efficiency, and make some land uneconomic to farm. - Removal of hedgerows and windbreaks would increase erosion and reduce productivity, especially on Ardleigh's open, flat landscape. - Conservation and environmental stewardship work—including newly planted hedgerows and	Agricultural Area (UAA) in England in 2023 was approximately 17 million hectares¹. The extent of permanent agricultural land take required by the entire project is approximately 203 ha (as set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]), which would equate to 0.001% of the UAA. The Land Use Framework for England² states that “<i>we enough land to build the homes needed to address the housing crisis, maintain domestic food production, restore nature at scale, and build clean, homegrown power to provide energy security</i>” and that there “<i>are not competing demands</i>”. The Framework has a stated aim “<i>by 2050 improved electricity transmission networks can be delivered alongside productive agriculture</i>”. The construction dust assessment has been undertaken in accordance with the IAQM construction dust guidance. The guidance assumes that beyond 250m of dust sources there should be no significant effect from dust. This distance is considered representative of the zone within which construction dust impacts are most likely to be significant and where mitigation measures are most effective. The assessment concludes that with appropriate mitigation applied there would be no significant effect on sensitive receptors within 250m of the Order Limits. Mitigation is included in the 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]. As noted above, the Applicant would continue to work with all landowners affected and compensation claims would be considered on a case-by-case basis, should negative impacts on fruit or other sensitive crops does occur despite the mitigation in place.

¹ Defra (2024) United Kingdom Food Security Report 2024: Theme 2: UK Food Supply Sources. Available at: United Kingdom Food Security Report 2024: Theme 2: UK Food Supply Sources - GOV.UK

² HM Government (2026). The Land Use Framework for England.

Topic	Comment	National Grid's response
	species recovery efforts like Operation Turtle Dove—would be destroyed. • Key local enterprises such as Peake Fruit, Prettyfields Vineyard, and Benson Stud Farm face serious operational and economic risks. • Livestock farms could be forced to relocate animals due to fencing removal, noise, dust, and disrupted grazing. • Increased security risks would arise from hedge removal, more unauthorised access, and greater exposure to theft.	
Land Use	The N2T project would cause substantial and lasting harm to Ardleigh's BMV Grade 1 farmland, its crops, livestock systems, biodiversity, and rural businesses. At a time when UK food production is increasingly fragile, the loss of such high-value agricultural land would weaken both local livelihoods and national food security.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys the extent of each land grade within Ardleigh Parish (predominantly Grade 2 and Grade 3a, with a small extent of Grade 1 land within the Order limits in Ardleigh Parish). This includes a commitment to return land affected temporarily to the pre-construction condition, including Agricultural Land Classification grade. This would be achieved through the implementation of good practice soil management measures, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance).

Topic	Comment	National Grid's response
		Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. The Applicant is and will continue to work with all landowners including farmers and equestrian facilities who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project progresses. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be written into voluntary land agreements. There will also be mitigation put in place where animal grazing maybe affected. As well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No detectable effects of EMFs have been found on, for example, health, milk production, fertility, and behaviour. This is confirmed in NPS EN-5(2024) which states: <i>'There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.'</i> Food security in the UK is a multi-faceted issue, shaped by domestic production capabilities, import dependencies, land use patterns (including landowner/manager decisions and preferences), and environmental challenges. The extent of Utilised Agricultural Area (UAA) in England in 2023 was approximately 17 million hectares³. The extent of permanent agricultural land take required by the entire Project is approximately 203 ha (as set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]), which would equate to 0.001% of the UAA. The Land Use Framework for England⁴ states that <i>"we enough land to build the homes needed to address the housing crisis, maintain domestic food production, restore nature at scale, and build clean, homegrown power to provide energy security"</i> and that there <i>"are not competing demands"</i>. The Framework has a stated aim <i>"by 2050 improved electricity transmission networks can be delivered alongside productive agriculture"</i>.

³ Defra (2024) United Kingdom Food Security Report 2024: Theme 2: UK Food Supply Sources. Available at: United Kingdom Food Security Report 2024: Theme 2: UK Food Supply Sources - GOV.UK

⁴ HM Government (2026). The Land Use Framework for England.

Topic	Comment	National Grid's response
Alternatives	9. Viable Alternatives Were Not Properly Assessed APC continues to call for full assessment of: • a strategic integrated offshore grid • offshore pooling of windfarm power • subsea HVDC transmission • brownfield coastal substations • relocation of the EACN outside Ardleigh • HVDC onshore alternatives where necessary These alternatives offer substantially reduced environmental, social and landscape impact and are more consistent with emerging national policy and the public interest.	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.
N/A	10. Requests of the Examining Authority APC considers that in respect of Ardleigh, the Examining Authority should set time aside for: A specific session of the examination dealing with the impacts on Ardleigh, given the	The Applicant acknowledges these points which are directed at the ExA and therefore not commented upon.

Topic	Comment	National Grid's response
	cumulative, detrimental effects of what is proposed (and the siting of the EACN in Ardleigh). b) Undertake a specific site visit at Ardleigh to view the routes of the proposed pylons and underground cabling in real life (rather than just on a plan) and to experience the village and surrounding landscape as it currently exists. APC may be able to facilitate a view from the tower of the Grade II* St Mary the Virgin Church, located at the medieval heart of the village, which provides clear views of the surrounding landscape and the impact that the proposal will have upon it. c) APC has prepared a short video in support of its objection. It would be grateful for directions as to how best to provide that video for your information. d) Can the Examiners please ask National Grid to explain how we can access information on what some of the codes on maps mean? APC considers that the Examining Authority should give full weight to:	

Topic	Comment	National Grid's response
	- the flawed site-selection process • non-compliant consultations - breaches of established siting rules - conflict with statutory planning policy - demonstrable environmental and heritage harm - unacceptable cumulative impacts - availability of viable, lower-harm alternatives	
N/A	For the reasons set out above and in APC's detailed submissions, APC strongly objects to the Norwich–Tilbury proposals affecting Ardleigh and urges the Examining Authority to either: 1. Recommend a refusal of the DCO, given the clear detrimental impacts posed by the proposed siting of the EACN and associated infrastructure in Ardleigh; or 2. Recommend modifications to the DCO, removing the infrastructure that adversely impacts Ardleigh. Such a course of action will	The Applicant notes the objection to the Project but also notes that it disagrees with the conclusions drawn and the interpretations of information. .

Topic	Comment	National Grid's response
	presumably require National Grid to advance alternative routes, sites and/or methods for expanding the grid.	
Consultation	[Ardleigh Parish Council document titled <i>Ardleigh Parish Council Response to National Grid Targeted Consultation</i> Location references: Essex 2 and Essex 4 March 2025]	It is recognised that as stated by APC in their full Relevant Representation, this report which has previously been provided to the Applicant through pre-application feedback exercises, is appended to the APC Relevant Representation for the benefit of the ExA. The Applicant has provided a response to feedback received during pre-application consultation exercises in the 5.1 Consultation Report [APP-066] .
Historic Environment	[Ardleigh Parish Council document titled 'Ardleigh Parish Council Response to National Grid Norwich to Tilbury Statutory Consultation July 2024 Historic Environment']	It is recognised that as stated by APC in their full Relevant Representation, this report which has previously been provided to the Applicant through pre-application feedback exercises, is appended to the APC Relevant Representation for the benefit of the ExA. The Applicant has provided a response to feedback received during pre-application consultation exercises in the 5.1 Consultation Report [APP-066]. The Applicant notes Ardleigh Parish Council's document titled "Ardleigh Parish Council Response to National Grid Norwich to Tilbury Statutory Consultation July 2024 Historic Environment." The information and points raised during the statutory consultation have been reviewed and considered in the context of the updated 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The Applicant has taken these inputs into account in refining the baseline assessment and informing ongoing mitigation discussions.
Historic Environment	[Ardleigh Parish Council document titled <i>Ardleigh History & Heritage Survey</i> Produced by Ardleigh residents in response to National Grid Norwich to Tilbury proposals. Date: 17-04-2024]	It is recognised that as stated by APC in their full Relevant Representation, this report which has previously been provided to the Applicant through pre-application feedback exercises, is appended to the APC Relevant Representation for the benefit of the ExA. The Applicant has provided a response to feedback received during pre-application consultation exercises in the 5.1 Consultation Report [APP-066]. The Applicant notes Ardleigh Parish Council's document titled "Ardleigh Parish Council Response to National Grid Norwich to Tilbury Statutory Consultation July 2024 Historic Environment." The information and points raised during the statutory consultation have been reviewed and considered in the context of the updated 6.11.A1 Environmental

Topic	Comment	National Grid's response
		Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]. The Applicant has taken these inputs into account in refining the baseline assessment and informing ongoing mitigation discussions.

2.4 Battisford Parish Council

- 2.4.1 Table 2.4 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Battisford Parish Council **[RR-0336]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.4 Comments and National Grid's response

Topic	Comment	National Grid's response
Noise and Vibration	The National Grid Map shows Pylon RG175 to the south of Hascot Hill in Battisford. This (and with a lesser impact, RG174) will be erected within the parish of Battisford. The Parish council is therefore concerned as to the level of Noise and Vibration that will occur during the construction and erection of the pylon.	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in Battisford in relation to noise and vibration from pylon construction with appropriate mitigation measures in place. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Transport and Traffic	There is likely to be significant disruption as this is a rural area and the only access is via a narrow road. Traffic congestion and disruption is highly likely as there are no easy or short diversion routes available. Highway safety is also a concern. To mitigate some of	The construction routeing strategy is set out in 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes (PARs) to the site access points. Hascot Hill has not been identified as a PAR. 6.16 F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020] page 13 displays that there are no PARs proposed in the Battisford area. The closest PARs are proposed to the north of Battisford on the A1120 and B1113.

Topic	Comment	National Grid's response
	this it will be important to ensure that construction traffic is limited in number and only operates between the hours of 8am – 5 pm weekday and 8 am and 1 pm on Saturday there should be no Sunday working.	Haul roads cross the public highway network at various locations. Crossover points will be used by construction traffic to cross the public highway. A crossover point is proposed on Hascot Hill. No HGV construction traffic is proposed to use these crossover points to access the haul road from the public highway under typical operation, and vice versa. Construction traffic using the crossover points is expected to give way to vehicles on the public highway. Short term temporary closures of Hascot Hill between points SM B-044 and SM-B-045 are required to facilitate overhead line netting activities and construction of the crossover points, as identified on Plan H of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section B [APP-034]. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. A temporary diversion route via Battisford Road, The Tye, B1078 Ringshall Road, Stowmarket Road and Valley Road has been identified. The Applicant proposes to use the Permit Schemes in place and operated by the Local Highway Authorities to best coordinate the street works required. Within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] it was concluded that full short-term temporary road closures are expected to be for no more than four weeks. Given the measures detailed within Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) the residual construction effects on driver/public passenger delay were therefore deemed minor and not significant. The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for traffic impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The detailed CTMP will be submitted to, and approved by, the relevant planning authority. The proposed construction core working hours, activities which can take place outside of the core working hours and the provision for start-up and close-down activities are available in full in Schedule 3 of 3.1 Draft Development Consent Order (Revision C).

Topic	Comment	National Grid's response
		The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C). 3.1 Draft Development Consent Order (Revision C) permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time-critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts. Trenchless crossings, underground cable jointing, oil processing of transformers, and certain commissioning activities may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Works affecting highways, railways and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors.
Landscape and Visual	A pylon of this height will affect a valued panorama viewed on entering the Parish.	The Applicant notes the concern relating to views. Effects on visual receptors within Battisford Parish are set out under Visual Receptor Areas (VRAs) B10 and B11 in paragraphs 13.5.109 to 13.5.132 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] with major and moderate adverse significant visual effects reported within approximately 1.5 km of the Project. Visual effects are assessed as being moderate significant (adverse) in Viewpoint 2.45 Church Road, Battisford in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] page 61.

2.5 Ben Goldsborough MP

2.5.1 Table 2.5 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Ben Goldsborough MP [RR-0348]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application. The Applicant notes that this RR is dated July 2024.

Table 2.5 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Needs case	As an MP I want to let you know how these proposals will affect my constituents	Noted
Biodiversity, ecology and nature conservation	South Norfolk constituency is by its very nature a rural area with prime agricultural land, ancient woodlands, and nationally important waterways. Our villages and towns are of historical significance and the community spirit which resides there is second to none. The area is notable for the number of Sites of Special Scientific Interest (SSSI) which not only protect and preserve rare flora and fauna they allow residents of our towns and villages to connect with our pristine wildlife: improving both their mental and physical health. The most notable feature of these SSSI’s is their variety. From the Caistor St Edmund Chalk Pit to Shotesham Common, Forncett	Through routeing, siting and design development, the Applicant has sought to avoid or if unavoidable reduce, as far as practicable, impacts on biodiversity and in particular features of high ecological value. Within South Norfolk this had included routeing the Project to avoid all Sites of Special Scientific Interest (SSSI); including Caistor St Edmund Chalk Pit SSSI, Shotesham Common SSSI, Forncett Meadows SSSI, Lower Wood, Ashwellthorpe and Duncan’s Marsh, Claxton SSSI. Potential direct and indirect impacts on nationally designated ecological designated sites within the 2 km Study Area have been considered within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No direct or indirect significant residual effects have been identified on any SSSI’s within South Norfolk or across the rest of the Project. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice mitigation measures to avoid or reduce impacts on designated sites and include specific mitigation measures as appropriate to ensure no significant residual effects.

Topic	Comment	National Grid's response
	Meadows, Ashwellthorpe Lower Wood and Duncan's Marsh, Claxton. When combined these parcels of land deliver the character South Norfolk is world renowned for. Any damage to these sites would harm our local ecosystem.	
Climate change	It is my, and residents who live along the proposed routes concern, that the proposal failed to adequately evidence the overall impact on carbon neutrality, protecting the natural and historic environment, and preserving residents' quality of life.	The Applicant has provided an Environmental Statement with the application for development consent which assesses the environmental effects of the Project. ES Chapter 18 Summary [APP-287] and the Non-Technical Summary [APP-298] provide a summary of the assessment and its conclusions. The Environmental Statement submitted with the application for development consent provides an assessment of the Project on the environment including in relation to greenhouse gases and carbon, biodiversity, the historic environment and health.
Consultation	National Grid has been slow to react and report back on concerns. This has driven a feeling of distrust between those living along the proposed route and those involved in its hypothetical construction.	5.1 Consultation Report [APP-066] details how the Applicant carefully considered the feedback received during the 2022 and 2023 non-statutory consultations, the statutory consultation, targeted consultations, and landowner consultation.
Transport and Traffic	National Grid have not adequately considered Public Rights of Way and the impact which will occur with the current route's proposal. Throughout our villages public foot paths and bridleways are well used.	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoW), including footpaths and bridleways. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329] , is to maintain access along PRoW at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected

Topic	Comment	National Grid's response
		PRoW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329] and will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan and will be supported by Road Safety Audits where required. The final PRoW Management Plan will be submitted to, and approved by, the relevant planning authority. All PRoW temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.
Transport and Traffic	Pylons will particularly affect routes in Hapton where undergrounding of the cables would be an excellent way of mitigating damage	The Applicant notes the concern regarding Public Rights of Way in the Hapton area. As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], all affected PRoW will remain accessible throughout construction either through managed access on their existing alignment or through appropriate temporary diversions. No PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to PRoWs within the vicinity of Hapton, those affected by The Project comprise Tharston Bridleway 1, Ashwellthorpe Footpath 5, Flordon Footpath 6 and Tharston Footpath 33. Ashwellthorpe Footpath 5 will require a temporary diversion for an indicative period of 15 weeks, associated with a pylon working area, during which users will be diverted around the perimeter of the working area. For the remainder of the period during which Ashwellthorpe Footpath 5 is affected by the Project, the PRoW will remain open on its existing alignment, with access managed as necessary in accordance with the 7.6 Outline PRoW Management Plan [APP-329]. Tharston Bridleway 1, Flordon Footpath 6 and Tharston Footpath 33 will all remain open on their existing alignments throughout construction, with access managed as required at points where they interact with construction activities, in accordance with the 7.6 Outline PRoW Management Plan [APP-329].

Topic	Comment	National Grid's response
		Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRow temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction surveys. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
Transport and Traffic	During construction phase I would be seriously concerned that Public Rights of Way will be closed. This would undermine our local tourism economy and the wellbeing of residents who use said routes for recreation and commuting via active travel.	As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], all affected PRow will remain accessible and usable throughout construction, either through managed access on their existing alignment or through appropriate temporary diversions. No PRow would be closed without a diversion in place, and no severance of the overall network is anticipated, ensuring continued access for recreational and active-travel users. The impacts of construction on Public Rights of Way (PRow) including temporary closures and diversions has been assessed and is presented within 6.16

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		Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. It was concluded that where PRowS remain accessible there would be minimal adverse effects on user delay. Nine PRowS would be subject to a temporary closure with a diversion route proposed in Norfolk with a duration of greater than four weeks. An assessment on the likely impact on delay to pedestrians, cyclists and horse-riders on these PRowS has been undertaken and is presented within Table 16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that the significance of effects on PRow user delay would be minor and deemed not significant when taking account of the proposed mitigation and controls detailed within 7.6 Outline Public Rights of Way Management Plan [APP-329]. Impacts on tourism economy and access to recreational routes have been assessed within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] (see paragraphs 15.7.2 to 15.7.19) and in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. No significant adverse effects have been identified on the tourism economy during construction, or access to recreational routes within South Norfolk during construction and operation (and maintenance). As set out in Commitment GG30 in 7.2 Outline Code of Construction Practice (Revision C), the Applicant will keep members of the community, local businesses and local stakeholders informed regularly of the works through active community liaison – this will include where relevant information about PRow. A free contact number, project email and freepost address will be provided which members of the public can use to raise any concerns or complaints about the Project.
Needs Case	Fundamental flaws exist in the design and there is a clear need for those involved to reevaluate their design to ensure more communities are confident that the project would benefit themselves as individuals and the wider community I acknowledge that the revised proposal incorporates the	The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, also introducing system resilience to provide crucial energy security for the East of England as a whole including local communities. Enabling the connection of new sources of renewable energy and by contributing to our energy security in the future, helps the country to achieve the government's Net Zero target and ensures that the National Grid meets future power demands. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 -

Topic	Comment	National Grid's response
	underground of 2km of route to the West of Diss and other small alignment changes in South Norfolk. However, for most of the route through the South Norfolk constituency there remains no change. This has frustrated residents who believe their suggestions have been ignored.	Alternatives [APP-127] and 5.15 Design Development Report [APP-122]. More localised design variants have also been considered. 5.1 Consultation Report [APP-066] sets out how the pre-application consultation exercises have informed the Project, including responses to specific requests and comments relating to the design.
Consultation	The current public consultation has also raised many questions from residents with a feeling that the decision was already made by National Grid. Tharston and Hapton Parish Council have echoed these feelings as they believe the consultation has been inadequate with valid alternatives not being present to the public for consideration.	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.
Alternatives	There are several alternatives which needed to be explored for residents to believe that their views are being properly considered. They include: • A fully integrated offshore grid; and • HVDC from Norwich to Tilbury, either underground or subsea. The subsea option	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC)

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	includes a platform for Five Estuaries and North Falls, which I would welcome	overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). HVDC cable requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection.
Needs case	Herein lies another issue with the consultation, given that the current public consultation was launched on 10 April 2024, I do not believe that National Grid have fully considered the ESO East Anglia Network Study of the East Anglia Onshore & Offshore Cable Routing Environmental and Community Appraisal, published on the 12 March 2024. Yet again National Grid reject options laid before them without fully explaining the decision-making process and this needs to be reconsidered.	The needs case in Section 3 'Needs Case' Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP-355] clearly states the existing system capabilities and the amount of energy that is expected to transfer across system boundaries. There are limitations as to what a circuit can carry, and these are defined by the International Electrotechnical Commission, who set ratings for 420 kV transmission, of 5,000 amperes being the highest available equipment. This equates to: • A capacity on a single circuit of 3,465 MVA (megavolt-ampere) • A double circuit of 6,930 MVA • And where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA. The current post-fault capacities are: • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW. Option 8, page 42, within the Electricity System Operator (ESO) East Anglia Network Study, (ESO – Now is the National Energy System Operator (NESO)), Evaluates an option with 2 x 2GW HVDC Links starting in Norwich and a 2GW Link starting from Friston. As shown above EC5 which is the boundary which is the boundary between Norwich in Bramford requires ability to manage capacities greater the 6GW in the near term.

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		Therefore, an option where all HVDC connections do not start at Norwich would not meet this need. Therefore Option 8 does not meet the need. The applicant has undertaken an appraisal of an option set out, Section 14 'Offshore 1 – Norwich to Tilbury' pages 101-108 of 7.17 Strategic Options Backcheck and Review [APP-355]. This option looked at a 3 sets of 2GW (6GW) links from Norwich to Tilbury substation as a less optimal solution that does not connect Bramford or generation at a capital cost of £4,096.50m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 of 7.19 2023 - Strategic Options Backcheck and Review (Final Issue A) [APP-357] states: "Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m). Therefore, the equivalent to the applicant proposal would be Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m (£5.3bn). Compared to the (ESO) NESO option 8 which does not meet the needs case on EC5N boundary of £4.9bn. The applicant has also undertaken recent work to show that the cost of HVDC cabling has lower cost in marine environments where a cable laying vessel can carry up to 100kms of HVDC cable in one operation. Compared to onshore HVDC undergrounding where circa 1km of cable can be delivered via road transport at a time. This leads to costs being 1.6 times higher for HVDC land installation than the offshore alternatives set out by the Applicant and not considered in the NESO report. Therefore, Applicant has shown the lowest cost alternative that meets the needs case set out Section 3 'Needs Case' Table 3.3, page 31 of 7.17 Strategic Options Backcheck and Review [APP-355]. That is the option most equivalent to NESO option 8, but meets the need
Community Benefit	Another issue with the proposal is a lack of transparency from	The government has published guidance on community funds for transmission infrastructure. In line with this guidance, the Applicant is committed to working with

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	National Grid of the local benefits of hosting such nationally important infrastructure. Residents are concerned that if the project continues in its current guise that compensation will be minimal and short-term. It's clear that community wealth must be derived from such high-impact infrastructure. This should not be the top-down imposition of bricks and mortar payback. Instead, this must be a commitment of repayments to Norfolk for its residents to decide how best to use the funding. National Grid's underlying operating profit for 2022/23 was £4,582 million. This was up 10% the previous financial year. National Grid must address this issue and provide residents with concrete promises to repay them for these potential pylons to exist within South Norfolk. A future Community Wealth Compensation must consider the disruption caused both during and after construction	industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure guidance.
Needs Case	Residents understand the need for the UK to reach its ambitious clean power by 2030 targets. We know that our grid infrastructure	The increased capacity being provided by the Project is critical to delivering a network which supports the clean power pathways as set out in the Clean Power Action Plan 2030, which is in turn explicitly referenced in the revised National Policy Statement EN-1 (2026). The Project responds to previously established policies and by coming forward

Topic	Comment	National Grid's response
	will need to be significantly expanded if we are to meet this target, and that Norfolk is well placed to deliver our climate change targets with our offshore power. My fear is the conduct of National Grid has undermined this noble aspiration which we must achieve to protect our natural and lived environments.	as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements. The National Energy System Operator's (NESO's) Clean Power 2030 report (Annex 2) identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks.
Consultation	It's clear from conversations with South Norfolk residents that National Grid's conduct in this process has been woeful. Information sharing has been poor and the inability to provide residents with a consultation that includes all options has removed a great deal of goodwill towards the scheme. I urge residents to keep engaging in the consultation process and sharing with National Grid their views on the project	The Applicant notes the concern raised. The Applicant recognises that trust and goodwill are important in any consultation process, and acknowledges that, where individuals feel they have not had access to the information they expected, this can understandably influence confidence in the wider project. The Applicant wishes to clarify that it is required to develop and consult on proposals in accordance with relevant national policy and guidance. Alternatives were considered and information on these alternatives has been provided at each stage of consultation, as well as reasons why these have not been taken forward. Throughout the consultation process, the Applicant sought to provide a broad range of information in multiple formats and to engage directly with communities to support understanding of the proposals. The Applicant remains committed to ongoing dialogue with communities along the route.

2.6 Billericay Parish Council

- 2.6.1 Table 2.6 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Billericay Parish Council **[RR-0368]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.6 Comments and National Grid's response

Topic	Comment	National Grid's response
Alternatives	Despite fundamental objections to the use of pylons rather than undersea or underground cabling, these options have not been seriously addressed. The project is however, proposing undersea cabling from Norwich to Kent.	The Project is not proposing undersea cabling from Norwich to Kent. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Land and Property	There appears to be no acknowledgement or compensation to the communities impacted by the project.	Compensation applies where land or rights are acquired under a Development Consent Order (DCO) and the retained property suffers a direct reduction in value because of the Project; this is called injurious affection. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code. Where a property owner is not directly affected by the Project, UK law does not provide compensation for generalised blight (e.g., perceived fall in property value due to proximity or visual impact).
Cumulative Effects	No joined-up planning appears to be taking place which considers the impact on widespread construction being planned for housing developments in and around Billericay.	The Applicant notes this comment. We have taken into consideration the location of planning applications and housing allocations in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts on housing development sites, where possible, including those within/close to Billericay. 5.15 Design Development Report [APP-122] , 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describes the iterative development of the Project from the strategic proposal, draft

Topic	Comment	National Grid's response
		alignment and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. At all stages in the development of the Project, the Applicant has taken into consideration local plan allocations (both adopted and emerging) as well as planning applications along the route. Section 2.6 also refers to third party development. 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085] outline where the Project has the potential to impact proposed or consented developments. Billericay Parish is within Basildon District and is located within Section G of the Project. An assessment of Cumulative Effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination (as appropriate). The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] concludes that in Basildon, overall, negligible and not significant effects would be expected in relation to socio-economics, recreation and tourism, ecology and biodiversity, contaminated land, geology and hydrogeology, hydrology, flood risk and land drainage, health and wellbeing, historic environment, noise and vibration, and air quality. Moderate adverse and significant effects could not be ruled out in relation to construction effects for landscape and visual, and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.
Consultation	The following statement was made to National Grid in response to their recent consultation on the planned 'Norwich to Tilbury' power	Noted. The Applicant has provided a response to pre-application consultation feedback in 5.1 Consultation Report [APP-066] .

Topic	Comment	National Grid's response
	transmission project. As you will read the Council has raised significant concerns as to the ongoing detrimental impact to Billericay. 'Norwich to Tilbury Consultation Feedback from Billericay Town Council	
Landscape and Visual	Section G: Basildon and Brentwood Visual Impact This power line will be visible from most of the west of the town because Billericay is higher than the route. The route goes through a special area of Greenbelt which is the first unspoilt Greenbelt as you leave London without housing, or any industrial buildings.	The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Effects on visual receptors within the town of Billericay are set out under Visual Receptor Areas (VRAs) G2 Billericay West in Section 13.10 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant effects are identified on receptors within 1.5 km, including the western edge of Billericay at Gooseberry Green and Queens Park. Further within Billericay effects would reduce to not significant due to layers of vegetation and buildings screening views. The tops of pylons would be visible on the skyline in places, as represented by Viewpoint 7.04 Tye Common Road, Tye Common which is assessed as not significant, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Part 4 of 4 [APP-232].
Historic Environment	This historic landscape is unchanged for centuries.	The Applicant acknowledges this comment. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project would not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements

Topic	Comment	National Grid's response
		(NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. Also, 7.4 Outline Landscape and Ecological Management Plan (Revision D) includes measures to retain and reinstate historic landscape features, in addition to the commitment H06 set out in 7.2 Outline Code of Construction Practice (Revision C).
Historic Environment	The pylons will be visible from the station in the centre of town and from Sun Corner at the end of the High Street. Billericay town centre is a Conservation Area, and this pylon route will have a detrimental effect upon that status.	The Applicant has reviewed the assessment of the Billericay conservation area (CA61) in light of the respondent's comments. The Applicant acknowledges that the line of pylons in the distance may potentially be seen from some parts of the town centre. However, 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] states that assets located outside the Order Limits, and where settings do not extend to the Order Limits, are not included in the baseline or assessment in this chapter, as there would be no potential for effects resulting from the Project. These assets are described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The Applicant has concluded that the setting of the Billericay conservation area (CA61) does not extend to the Order Limits, and that intervisibility alone is not sufficient to establish such an extent. The setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development. In line with established heritage guidance, the Applicant has considered all relevant factors and has therefore concluded that there would be no potential for effects resulting from the Project on this conservation area as the setting does not extend to the Order Limits despite some visual connection.

Topic	Comment	National Grid's response
Landscape and Visual	The area to the west of Billericay provides open vistas from the town which enhance the amenity of residents and need to be preserved. This area is of great visual importance and as residents of Billericay we will be deprived of the aesthetic beauty in this part of the Town by these pylons. The area to the west of Billericay provides open vistas from the town which enhance the amenity of residents and need to be preserved. This area is of great visual importance and as residents of Billericay we will be deprived of the aesthetic beauty in this part of the Town by these pylons.	As noted previously, the LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). The visual assessment references the conservation area as part of the visual baseline and sensitivity (paragraphs 13.10.13 and 13.10.15 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]). Significant effects are identified on receptors within 1.5 km of the Project, including the western edge of Billericay at Gooseberry Green and Queens Park. Further within Billericay effects would reduce to not significant due to layers of vegetation and buildings screening views, including from Billericay station and from the High Street. The Applicant notes the concerns about views and visual amenity. Detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences. The Applicant starts from the policy position set out in National Policy Statement (NPS) EN-5 (2024). This is clear on the strong starting presumption that overhead lines in general are appropriate. The area identified by the Council is not within a nationally designated landscape and not within the setting of a nationally designated landscape. Therefore NPS EN-1 (2024) paragraph 5.10.34 and the reversed assumption to use underground cables as per NPS EN-5 paragraph 2.9.20 are not engaged. The Applicant also does not consider that the tests in NPS EN-5 paragraph 2.9.23 are engaged.
Landscape and Visual	There are many fine viewpoints within the town that give views over open countryside to the west that will be despoiled by this power line.	As noted previously, the LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). The Applicant notes that the closest representative viewpoint to Billericay town is Viewpoint 7.04 Tye Common Road, Tye Common which is assessed as not significant, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Part 4 of 4 [APP-232]. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all

Topic	Comment	National Grid's response
		viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in 7.12 Visualisations – Part 1 to Part 7 [APP-343 to APP-349]. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in 7.12 Visualisations - Part 8 and Part 9 [APP-350 and APP-351]. It is important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone.
Transport and traffic	Disruption to the Community There will be major traffic disruption in the Town especially over the 4-5 years estimated construction phase caused by the delivery of materials and construction traffic.	As noted in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing to use Primary Access Routes (PARs) to route construction traffic from the Strategic and Major Road Networks to the site access points. As shown on Page 28 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020], the Applicant is proposing PARs within Billericay along A176 Noak Hill Road / A176 Laindon Road / A129 Southend Road and A129 Sun Street / A129 London Road / A129 Rayleigh Road (PAR 58 and PAR 59). 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] details that PAR 58 and PAR 59 have a proposed temporary vehicle net increase of 15 HGV movements per hour, and 7 HGV movements per hour when considering the one-way system in both the AM and PM peak hours. This equates to a percentage increase of just 1%. This peak worst-case construction activity would be over a duration of 7 weeks. 7.11 Transport Assessment [APP-333] provides detail of the assessment undertaken on key junctions along the PARs. For Site 82, the junction of Mountnessing Road and A129 London Road, the modelling indicates that there may be a slight increased delay for vehicles turning from and into Mountnessing Road, due to the reduction in gaps in traffic from the construction traffic travelling along the A129. The Applicant is proposing to monitor the junction during the construction phase and will continue to engage with Essex County Council throughout the construction period. Images E.58 and E.59 in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] provide an

Topic	Comment	National Grid's response
		indicative graph of construction vehicle peak movements for PARs 58 and 59 respectively (for the worst-case peak hour). The Applicant has developed 7.3 Outline Construction Traffic Management Plan (Revision B), the purpose of which is to monitor, mitigate and manage the impacts around construction traffic. The Main Works Contractor(s) will develop the final Construction Traffic Management Plan(s), to be submitted to, and approved by, the relevant planning authority. Furthermore, within 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], workers will be encouraged to car share or undertake flexible working practices, to further reduce the number of construction vehicles through each junction.
Transport and traffic	The extended construction phase will involve creating access roads for construction traffic utilising existing roads as well as creating new access routes across existing agricultural and open land.	The Applicant notes the respondent's feedback. The Applicant sets out the proposed construction routing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction vehicles are proposed to be routed along Primary Access Routes (PARs) to a site access point. The construction vehicles will then travel down the Project alignment on the temporary internal haul road. The strategy for haul roads is in line with EN-1 policy of re-routing traffic away from congested areas and reduces the number of construction vehicles on the public highway. 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. Measures to protect land, soils and drainage systems are addressed in Outline CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction to the pre-construction condition, including Agricultural Land Classification grade.
Transport and traffic	Most of these existing roads such as Old Church Lane and Buttsbury Wash are very narrow and unsuitable for construction vehicles or heavy	The construction routing strategy proposed details that construction traffic is routed along Primary Access Routes (PARs) to the site access points, before joining the temporary internal haul road. Construction Heavy Goods Vehicles not adhering to the construction routes has been identified as a matter of non-compliance and the Main

Topic	Comment	National Grid's response
	plant but are nonetheless heavily used by local traffic which will be disrupted and delayed.	Works Contractor will follow the enforcement procedure detailed in Section 6.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is not proposing to use Old Church Lane or Buttsbury Wash as a PAR. The Applicant is committed to minimising disruption on local highway networks. 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] have been developed to provide the management principles which will help mitigate the impacts of construction traffic. In accordance with commitment GG30 in 7.2 Outline Code of Construction Practice (Revision C), members of the community and local businesses will be kept regularly informed of the works through active communication. This is anticipated to include notification of heavy traffic periods.
Transport and traffic	There are major concerns around vehicle capacity and the vast increase in traffic alongside much larger construction vehicles on already congested roads. London Road (A129) will become a pinch point for construction traffic and there has been no consideration of the impact of additional future planned developments/construction sites (as listed below) near the A129 and the pylon route.	The A129 has been captured as Link PAR 59 in the Traffic and Transport Assessment undertaken by the Applicant. Link PAR 59 consists of A129 Sun Street/A129 London Road/A129 Rayleigh Road. The link is classified in the assessment as sensitive, with a large percentage increase in Heavy Goods Vehicle (HGV) numbers compared to low future baseline HGV numbers (162% increase), and a total increase in traffic of 2%. Further details can be found in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Based on the 7.11 Transport Assessment [APP-333], during the peak hours, 15 construction vehicles are expected on the A129 London Road (seven in each direction) during peak construction, which equates to one additional vehicle every 4 minutes. Therefore, no significant effects are expected as a result of the Project construction activity. The 7.11 Transport Assessment [APP-333] identified five initial junctions on the A129: • A176 / A129 Southend Road (Site 78) • A129 Southend Road / A129 Sun Street (Site 79) • A129 Sun Street / A176 Laindon Road (Site 80) • A129 London Road / Western Road (Site 81) • A129 London Road / Mountnessing Road (Site 82).

Topic	Comment	National Grid's response
		Sites 78 and 80 were not subject to junction modelling as they were excluded based on the findings of the initial sifting process found within 7.11 Transport Assessment - Appendix F - Junction Capacity Assessment [APP-339]. The sifting process identified there was no existing congestion at the junction and no potential capacity issues due to the increase in construction traffic. The junction modelling indicated that Site 79 operated within capacity with the inclusion of construction traffic, without the need for mitigation. The junction modelling for Site 81 indicated a slight decrease in the available capacity with the addition of Norwich to Tilbury construction traffic. The Applicant is proposing signal time optimisation at this junction as a mitigation measure. For Site 82, the Applicant is proposing to monitor the junction during construction, particularly in relation to stacking capacity for right-turning traffic from A129 London Road into Mountnessing Road.
Transport and Traffic	Planned development sites around the A129 London Road • 19/01725/OUT - Land north of London Road - 480 new homes • 24/00004/OUT – Land south of London Road -130 new homes • 24/00479/FULL – Land west of Heath Close - 65 retirement apartments • 24/00762/OUT – Land west of Laindon Road – 700 new homes -25/01214/OUT - Land west of Tye Common Road - 175 new homes Regarding Section G Sheet 3/6 in the Land Plans Maps. This shows cabling and pylon insulation in the same location A Plan Solar Farm.	7.11 Transport Assessment - Appendix D - Committed Developments [APP-337] provides detail of the developments included within the assessment. • Land North of London Road – This development application (19/01725/OUT) has been identified since the Development Consent Order (DCO) submission (pre-1 April 2025 list) and will be considered. If there are changes to the conclusions reported in 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333], then these will be reported during Examination. • Land South of London Road was excluded as no details were provided on construction programme or anticipated flows. • Land West of Heath Close – This development application (24/00479/FULL) was withdrawn in February 2025 and therefore excluded from the assessment. • Land West of Laindon Road was excluded as no information on construction and traffic flows were included within the application. • Land West of Tye Common Road – This development application (25/01214/OUT) was submitted after DCO submission and therefore not included within the assessment. The Applicant will consider this new planning application and update the conclusions of 6.16 Environmental Statement Chapter 16 – Traffic and Transport

Topic	Comment	National Grid's response
		[APP-271] and 7.11 Transport Assessment [APP-333] during Examination where significant effects are identified.
Biodiversity, ecology and nature conservation	Environmental Impact • The pylon route runs down the western side of Billericay and through Billericay Marshes which is an undeveloped and undisturbed green area full of wildlife.	The Applicant has sought to minimise impacts on priority habitats and statutory and non-statutory designated sites through careful route selection and siting of the Project. Billericay Marshes is not recognised by the Applicant as a formal statutory or non-statutory designated wildlife site. The area to the west of Billericay is predominantly arable land, of lower ecological value, with hedgerow field boundaries. However the River Wid and Havingsgrove Brook do lie within the area and, along with the associated wetter habitats either side, provide valuable ecological habitat and act as wildlife corridors. Where ecological impacts are anticipated, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. 7.4 Outline Landscape and Ecological Management Plan (Revision D) clearly sets out all ecological mitigation measures to be implemented, including embedded, standard and additional mitigation. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on priority habitats or designated wildlife sites.
Water environment	This area is also on the existing flood plain of the River Wid which already has serious existing issues with flooding on a regular basis and is the main reason the area has remained undeveloped.	It is acknowledged that areas such as these are susceptible to flooding in 7.9 Flood Risk Assessment [APP-331] . Works in these areas would be programmed to avoid periods of flooding. Appendix B of 7.9 Flood Risk Assessment [APP-331] describes the review that has been undertaken to identify pylons located within the fluvial floodplains of watercourses and summarises the compensatory storage calculations. As shown in this appendix, there are two pylons in the River Wid floodplain that compensatory storage would be provided for. Section 4.8 of 7.9 Flood Risk Assessment [APP-331] provides detail on the measures that would be in place with respect to fluvial flooding during construction and operation. The measures have been agreed with the Environment Agency and, with these measures in place, there would be no significant effects.
Alternatives	It is noted that pylons TB198, TB199 and TB200 are to be positioned in this area which	The Applicant has considered alternative routes in this area including the suggestion to move the alignment between the marshes and St Giles Church. There are multiple constraints to routeing in this area including, environmental features and residential properties that are present including the sewage treatment works, listed buildings

Topic	Comment	National Grid's response
	would seem unwise given the instability of the location?	including Grade I listed heritage assets at Ingatestone Hall and St Giles Church Mountnessing and ancient woodland. The rationale for the alignment was set out in the 7.21 2024 - Design Development Report for the Project [APP-359] and in the absence of new information or new factors being identified, those conclusions remain valid and the general alignment unchanged subject to small modifications to individual pylon positioning. Proposed infrastructure has either been positioned outside Flood Zones or can be designed in a way that would be resilient to risk of damage from flooding and designed so as not to exacerbate flood risk nor cause damage to the river and its ecosystem. 7.9 Flood Risk Assessment [APP-331] has been prepared for the Project which has informed the Environmental Impact Assessment (EIA) that has identified the mitigation measures necessary to prevent the Project from increasing fluvial flood risk. The pylon foundation type and design is based on ground investigation and risk assessments undertaken, to inform the detailed design of the Project, which includes what type of concrete that would be used. In addition, a Foundation Works Risk Assessment will be undertaken, in accordance with commitment GH02 of 7.2 Outline Code of Construction Practice (Revision C) where piled foundations are required, such as at pylon bases, which would assess (amongst other scenarios) the potential for contamination of groundwater and subsequently surface waters by turbidity, drilling support fluids, concrete, cement paste or grout. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] details soil handling during construction in line with good practice measures, to ensure the protection of soil resources associated with the marshes.
Water environment	Damage caused through the construction phase risks causing irreparable damage to the river and its eco systems.	Through routeing, siting and detailed design the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including river ecology. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity such as river corridor habitats, through avoidance or mitigation. The same approach has been taken to account for rivers and their floodplains, seeking to avoid or reduce the footprint of the Project within floodplains. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken, including along river corridors including the River Wid and its tributaries. The data have informed the assessment of effects on biodiversity, hydromorphology, water quality and flood risk presented in 6.8 Environmental Statement Chapter 8 - Ecology

Topic	Comment	National Grid's response
		and Biodiversity [AS-026], 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and 7.10 Water Framework Directive Assessment [APP-332]. Further, the Project has engaged with Natural England, the Environment Agency and Local Planning Authorities on aspects relating to river ecology, water quality and flood risk and appropriate mitigation measures and techniques have been secured, as detailed in 7.2 Outline Code of Construction Practice (Revision C). The temporary access crossings of the River Wid are proposed to be single span bridges. Use of bridges for these crossings reduces the risk of channel bed/bank modifications (which could disrupt flow regimes and have effects on hydromorphology) compared to alternative crossing types. Paragraphs 4.2.6 to 4.2.17 of 7.10 Water Framework Directive Assessment [APP-332] describe the measures that would be in place with respect to watercourse crossings while paragraphs 4.2.18 to 4.2.21 address the measures with respect to general construction works. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects including for river ecology. The BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. As well as seeking to avoid and minimise our impacts on nature, the Project includes enhancement of watercourse habitats as part of BNG mitigation. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Biodiversity, ecology and nature conservation	Billericay Marshes is an area full of wildlife with 46 distinct species of birds recorded along with a variety of insects, bats, other mammals and reptiles. The construction of pylons here would cause considerable habitat damage to the marshes. Overall, the construction phase will result in considerable	The Applicant has sought to minimise impacts on priority habitats and statutory and non-statutory designated sites through careful route selection and siting of the Project. Billericay Marshes is not recognised by the Applicant as a formal statutory or non-statutory designated wildlife site. The area to the west of Billericay is predominantly arable land, of lower ecological value, with hedgerow field boundaries. However the River Wid and Havingsgrove Brook do lie within the area and, along with the associated wetter habitats either side, provide valuable ecological habitat and act as wildlife corridors. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact

Topic	Comment	National Grid's response
	damage to the environment and bio-diversity with the destruction of trees and hedgerows which will take many years to recover.	Assessment (EIA) process for the Project, a suite of ecological surveys, including invertebrate, bats and reptile surveys, has been undertaken between 2022–2025. Where ecological impacts are anticipated, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out all ecological mitigation measures to be implemented, including embedded, standard and additional mitigation. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on any ecological receptors. The Applicant has also committed to deliver 10% BNG with environmental and societal benefits on all their construction projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is presented in 7.1 Biodiversity Net Gain Report [APP-299].
Alternatives	Alternative Option to Pylons It is the view of the Town Council that the power cabling should be routed under water from the wind farm along the Thames Estuary to the Tilbury site. Alternatively, underground cabling should be deployed. Both these alternatives should be formally and thoroughly assessed prior to final decisions being made. Both have the considerable advantage of causing minimal damage to the environment or disruption to the lives of our Residents.' It is the view of the Town Council that a fully costed options appraisal for all 3 options has never been carried out with the full	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

Topic	Comment	National Grid's response
	anticipated costs of the proposed project never having been clearly stated.	

2.7 Boxted Parish Council

2.7.1 Table 2.7 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Boxted Parish Council [RR-0378]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.7 Comments and National Grid's response

Topic	Comment	National Grid's response
Landscape and Visual	Executive Summary of objection: Boxted Parish Council (BPC) objects to the proposed Norwich to Tilbury powerline, on three key principles: 1) Unacceptable damage to environment, with particular note to the extensive damage of undergrounding through the Dedham Vale National Landscape,	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies (SEBs) and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental Statement) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce risks to habitats and species. In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10 % greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and

Topic	Comment	National Grid's response
		aligned with our corporate sustainability commitment. Boxted Parish Council's position is noted. The Environmental Statement is based on an assumed worse case tree and hedgerow removal, including that within Dedham Vale National Landscape, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 162 to 177 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on Dedham Vale National Landscape (DVNL). The assessment was undertaken taking into consideration the Special Qualities, which describe which aspects of natural beauty are important in the DVNL. The Applicant considers that there will be significant adverse effects on the special qualities of the DVNL at construction, and that these will reduce to not significant at operation (and maintenance). Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries. Effects on landscape receptors within Boxted parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment

Topic	Comment	National Grid's response
		[APP-228] under Great Horkesley Farmland Plateau Landscape Character Area (LCA) in paragraphs 13.3.528 to 13.3.542, Stour River Valley Slopes LCA in paragraphs 13.3.458 to 13.3.471 and Stour River Valley Floor LCA in paragraphs 13.3.444 to 13.3.457. The assessment includes consideration of the construction effects of undergrounding within and adjacent to the DVNL as well as the proposed 400 kV overhead lines. The Applicant notes there would be no direct impacts of undergrounding within Boxted parish itself but there would be construction within DVNL adjacent to the parish boundary. The LVIA reports significant adverse effects on the landscape character of the Great Horkesley Farmland Plateau within approximately 1.5km of the Project during construction and significant adverse effects (outside DVNL) within 0.5 km during operation. There would be significant effects on the Stour River Valley Slopes and Stour River Valley Floors LCA (within DVNL) within approximately 0.5km of the Project during construction, which would reduce to not significant at operation (and maintenance).
Biodiversity, ecology and nature conservation	[...].resultant threats to biodiversity and ecology and the continued risk of harm to wildlife most notably all airborne species.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on important ecological features; including designated sites, priority habitats and protected species. These important ecological features have been identified following a suite of ecological surveys between 2022-2025, including airborne species such as bats and birds. All ecological impacts have been assessed in full within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Where fragmentation impacts during construction have been identified, mitigation measures, such as bat flyways, have been proposed as detailed within 7.4 Outline Landscape and Ecological Management Plan (Revision D). The Project comprises underground cabling through the Dedham Vale National Landscape and as such, collision risk to birds would not occur through this area. An overhead line is however proposed between Ardleigh and Great Horkesley within this parish. Collision risk has been assessed within 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP 167 to APP 170]. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the

Topic	Comment	National Grid's response
Landscape and Visual	2) Unacceptable impact on landscape character, particularly the wide open fields and skies of Boxted and the proximity to the Dedham Vale National Landscape, but also dereliction of the entire 180km line of East Anglian countryside.	earth wire are proposed at Ardleigh Reservoir as detailed in 7.4 Outline Landscape and Ecological Management Plan [AS-046]. The Applicant acknowledges the concerns relating to effects on landscape character around Boxted and proximity to the National Landscape. It is noted that the Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km. Effects on landscape receptors within Boxted Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Great Horkesley Farmland Plateau Landscape Character Area (LCA) in paragraphs 13.3.528 to 13.3.542, Stour River Valley Slopes LCA in paragraphs 13.3.458 to 13.3.471 and Stour River Valley Floor LCA in paragraphs 13.3.444 to 13.3.457. During operation (and maintenance) there would be non-significant adverse effects on the Stour River Valley Slopes LCA and Stour River Valley Floor LCA, this is due to the restoration of the landscape following the installation of underground cables in DVNL. There would also be significant adverse effects on Great Horkesley Farmland Plateau LCA within 0.5 km of the proposed 400 kV overhead line which would reduce to not significant adverse beyond that distance. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant effects on landscape character will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Refer to the response above in response to effects on Dedham Vale National Landscape.
Health and Wellbeing	3) Unacceptable harm to the inhabitants, visitors and businesses of Boxted parish from the construction, life-time effects, maintenance and decommissioning of this proposed transmission line.	The Applicant is a responsible developer who has sought to engage with local communities such as Boxted, to understand potential issues and concerns as they relate to the construction and operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The approach that has been taken to consultation is set out in 5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071].

Topic	Comment	National Grid's response
	BPC opposes the scheme as proposed.	The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact community facilities, businesses, the local economy, recreational and tourism activity and land-uses and identifies potential mitigation measures where appropriate to reduce negative impacts. Businesses, community, tourism and recreation facilities within 500 m of the Project are identified on 6.15.F2 Environmental Statement Figure 15.2 - Community Facilities, Businesses, Recreation and Tourism Assets [APP-269], with recreational land and routes identified on 6.15.F3 Environmental Statement Figure 15.3 - Recreational Land and Recreational Routes [APP-270]. No significant effects have been identified on facilities in the Boxted area during construction or operation (and maintenance) phases. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about the construction process, or living close to an overhead line. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives Development Consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n-t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance. The Applicant is committed to working with Ofgem, industry

Topic	Comment	National Grid's response
		partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Alternatives	BPC considers there to be viable alternatives that have not been fully considered and these have not been adequately presented for consideration or consultation. The alternatives included but are not limited to offshore grids, more suitable cable landing sites for windfarms and interconnectors, and not least less destructive and more efficient methods of power transmission.	The Applicant has fully considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant is required to present its proposals for consideration, which it has done, and to describe the reasonable alternatives considered, which again it has done. The Applicant is not

Topic	Comment	National Grid's response
		required to and it would be disingenuous to present options (such as HVDC cable) that will not pass the Regulatory approval process that it must follow.
Biodiversity, ecology and nature conservation	National Grid have not suitably demonstrated that they have considered all options to mitigate for environmental damage.	The Environmental Statement (ES) (Volume 6: Environmental Statement) includes an impact assessment (including the Boxted area) of 11 environmental topic chapters, and each topic chapter outlines mitigation measures to avoid, reduce and offset (if possible) adverse effects as a result of construction and operation (and maintenance) of the Project. Mitigation measures have also been designed in accordance with industry guidelines, good practice and in consultation with relevant stakeholders and consultees. Identified mitigation is secured through Environmental Control Plans including 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D) which would be developed into final plans (in consultation with relevant stakeholders such as the Local Planning Authorities and Statutory Environmental Bodies) and discharged prior to construction commencing.
Good design	Boxted is at threat from this proposal primarily because of the route choice, which has been predicated on the siting of the East Anglian Connector Node (EACN). BPC considers the justification for the existence of the EACN to be lacking and opposes its location and necessity	The Applicant disagrees and its position is that it has thoroughly tested alternative locations and has a clear and compelling basis for its selection of the site to the east of Ardreigh. The Applicant considered alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardreigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN1 (2024) and NPS EN5 there were alternatives considered that would avoid routeing through the National Landscape.

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Consultation	BPC considers the lack of consultation on other matters relating to the EACN to be a gross injustice, and the justification for its existence should not be made purely on pre-conceived and pre-assumed decisions. As the EACN is the sole reason for bringing this powerline through the Dedham Vale National Landscape, and specifically through Boxted, then we consider that the entire existence of the EACN and all of it's connections, should be open for consultation at this stage too.	The EACN is an integral part of the Project Need case with the Project providing the optimum means of addressing boundary transfer deficiencies and the need to connect two offshore windfarms and an interconnector. The siting of the EACN has been comprehensively considered as set out in the response above. The Applicant does not agree there has been a lack of consultation. Government and Planning Inspectorate guidance on NSIPs makes clear that consultation should be undertaken on proposals that the Applicant is actively developing and reasonably considers to be deliverable, rather than on an open-ended range of hypothetical alternatives. That guidance was developed with explicit regard to the Gunning Principles, which require consultation to be undertaken at a formative stage, with sufficient information to allow intelligent consideration and response, and with an open mind to the feedback received. In developing the Project, the Applicant has followed this statutory guidance and carried out consultation on the proposed overhead line connection, including its route through the Dedham Vale National Landscape and the area around Boxted. The purpose of that consultation was to seek views on the Project as proposed, including its need, design, routing, and likely effects, and to use that feedback to inform further development of the proposals. The Applicant considers that consultation has therefore been undertaken at an appropriate stage and on appropriate matters, in accordance with the Planning Act 2008, relevant guidance, and the Gunning Principles. The adequacy of that consultation was considered by the Planning Inspectorate when it accepted the application for examination. Further detail on the Applicant's approach to consultation and its application of the Gunning Principles is set out in the Consultation Report, including Appendix N: Legal Opinions [REP1-007].
Land use	Regarding the specific proposal as presented, BPC outrightly opposes any form of power transmission of this scale across our parish or neighbouring parishes, indeed across the entire region. It is a monumental shortsightedness that utility corridors were not laid out when trunk roads and motorways were laid out,	The Applicant notes the reference to utility corridors, but as the respondent notes they were not established so are not available to the Project. On the matter of land take during construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on

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	however continuing to sacrifice countryside and prime agricultural land for this purpose is barbaric and beyond farcical.	farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the project, including across Boxted Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Socio-economics, recreation and tourism	Parish wide objection to any transmission scheme can broadly be divided into two key concerns: 1 – permanent impacts and harms 2 – temporary/construction phase impacts and harms. Different methods of transmission and their differing installation methods vary the amount of impact between these. In this response we have documented these harms and demonstrated these differences. We consider the scheme as proposed to be sufficiently harmful with permanent effects that lead us to outrightly object to it.	The Applicant is a responsible developer who has sought to engage with local communities such as Boxted, to understand potential issues and concerns as they relate to the construction, operation and maintenance phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The Environmental Statement chapter considers how the Project might potentially impact the local economy, local employment, tourism economy, community facilities, businesses, recreational and tourism activity during both construction and operation (and maintenance) phases and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation, and Tourism receptors within Boxted Parish Council in the assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. The assessment acknowledges that during both construction and operation (and maintenance) phases, impacts are likely to be experienced differentially by members of local communities according to factors

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		such as where they live, or their outlook. However, no significant impacts relating to physical or mental health and wellbeing have been identified. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives Development Consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n-t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required).
Alternatives	We offer the suggested mitigation of undergrounding through Boxted as a means to reduce some permanent harms but are acutely aware that it introduces different permanent harms and even greater temporary, construction phase harms.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Arleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Extending the underground cable

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		further eastwards meets a further pinchpoint where there may be insufficient space between buildings near the crossing on the A12 from the EACN side Cable Sealing End compound is not justified as there is no justification to move it in light of effects on the National Landscape and the requirements of 2.9.23 are not engaged. In conclusion, whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant's view is this is not justified.
Consultation	BPC also considers NG's consultation to have been deficient. Information regarding the consultation was not sufficiently distributed, with NG instead relying on Parish councils and campaign groups to spread information on their behalf, when it is their statutory responsibility to do so. Not having learnt from previous consultations, NG continued to plan consultation events at inconvenient times and in inconvenient places, whilst overlooking obvious locations in places most directly affected by their proposals (e.g. never visiting Ardleigh). Information delivered to Parish councils was no more detailed than what was sent to the few most proximal residents to the proposed route. BPC requested large scaled printed maps of the proposals through Boxted. These were forgotten about on	The Applicant does not agree that consultation on the Project has been deficient. The Project comprises a proposed overhead line connection over 2 km in length and is therefore classified as a Nationally Significant Infrastructure Project (NSIP), requiring development consent under the Planning Act 2008. The Act, together with statutory guidance published by government and the Planning Inspectorate, establishes clear expectations for how consultation should be undertaken. That guidance was developed with specific regard to the Gunning Principles, and the Applicant has developed its proposals and carried out consultation in accordance with both the statutory framework and those principles. The Applicant developed a Statement of Community Consultation (SoCC) which was consulted on with local authorities. The SoCC set out how consultation would be advertised and promoted and the Applicant undertook this through a range of methods, including direct mail to residents and landowners, statutory notices, public information events, webinars, and the publication of information on the project website. Parish councils and community groups were engaged as statutory and non-statutory consultees in their own right, not relied upon to discharge the Applicant's consultation responsibilities. Engagement with parish councils was intended to supplement wider consultation activity and to provide additional routes for information sharing, rather than to replace direct engagement with affected communities. In arranging consultation events, the Applicant sought to provide opportunities for engagement across the wider study area, taking account of venue availability, accessibility and geographic spread. Events were held at different times and on different days, and were supported by online materials and written consultation documents to ensure that those unable to attend in person could still participate. While not every settlement could host an event, residents of all areas, including those most directly affected by the proposals, were able to engage through multiple channels. The Applicant

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	the first request, delayed on the second request after which time the wrong plans were sent. On the third request no plans have been forthcoming from the engagement team. On a fourth request they took three weeks to arrive and were too late to be of use. Many respondents to previous consultations, BPC included, were ignored and their responses were not addressed or not considered	does not accept that the absence of an event in a particular location demonstrates a failure to consult or an intention to inconvenience consultees. Information provided to parish councils was consistent with that made available to other consultees at the same stage of the preapplication process. This reflects the purpose of consultation at that stage, which is to seek views on developing proposals rather than to present finalised designs or examination level detail. As the Project progressed, further information was published and made available, and consultees were notified of updates accordingly. The Applicant does not accept that parish councils were overlooked or provided with insufficient information as a matter of approach. The Applicant acknowledges that there were issues with the provision of printed mapping requested by BPC and regrets the delays and errors that occurred. These administrative matters were not intentional and do not reflect the Applicant's overall commitment to engagement. Throughout consultation, detailed plans were made available online and at events, and consultees were able to comment on the proposals using those materials. While the Applicant recognises that the difficulties experienced were frustrating, they do not amount to a failure of consultation as a whole. All consultation responses received, including those from BPC and from respondents to previous stages of consultation, were recorded, reviewed and considered by the Project team. Feedback informed the development of the Project and the identification of mitigation, as set out in the Consultation Report. The fact that consultees may disagree with the Applicant's conclusions or with the final proposals does not mean that their views were ignored or not taken into account. The Planning Inspectorate considered the adequacy of the Applicant's preapplication consultation when deciding to accept the application for examination. Further detail on the Applicant's application of the Gunning Principles is provided in the Consultation Report, including 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Alternatives	In conclusion this response documents how Boxted Parish Council unanimously objects to the proposed Norwich to Tilbury transmission line. We support other parish, town, city, borough and county councillors	The Applicant notes the respondent's feedback. Cost is one of many factors that was considered in making decisions on the Project as guided by our duties under the Electricity Act 1989. The NPS EN-5 (2024) makes it clear that the Government considers overhead lines to be appropriate and acceptable in most instances. However, the Government is aware that overhead lines may not be appropriate in particularly sensitive areas. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting¹⁸). Its aim is to ensure that decisions regarding

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	as well as MPs in calling for a complete halt to National Grid's proposal whilst better alternative are sought that benefit the whole region and ultimately the whole country. The cheapest and quickest route is not the best one, and we have demonstrated in this response exactly why that is the case for Boxted	the project's design (route, location, or technology option) are based on a full understanding and balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. The consideration of cost within the decision-making process is therefore one of our statutory duties and is not something that we could make representation to the Office of Gas and Electricity Markets (Ofgem) to waive.
Landscape and Visual	Boxted Parish – Impact of proposal In the proximity of Boxted, the proposed pylon line crosses swathes of farmland with wide open views on the aptly named "Great Horkesley Farmland Plateau". As such the pylons will be visible for miles around.	The Applicant acknowledges the concerns relating to effects of the Project on views within and around Boxted. It is noted that the Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226] identifies significant adverse residual visual effects. The assessment in relation to Boxted parish is set out under Visual Receptor Areas (VRAs) VRA C8 Higham (paragraphs 13.6.83 to 13.6.94), VRA C11 Langham (paragraphs 13.6.122 to 13.6.137), D1 Tye Green and Boxted (paragraphs 13.7.1 to 13.7.12) and D3 Great Horkesley and Horkesley Heath (paragraphs 13.7.25 to 13.7.40) in Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. During operation (and maintenance) significant adverse effects are identified on receptors within 1.5 km of the overhead line in VRA D1, VRA D3 and VRA C11. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant effects on landscape character will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
Landscape and Visual	Undergrounding has been proposed in the vicinity of Greak Horkesley, bordering our parish, where it was suggested	The Project has been designed to minimise effects on Dedham Vale National Landscape (DVNL); including consideration of the Project within the National Landscape and its setting. In respect of this section the 2025 Design Development Report [APP-122] sets out the factors that lead to this progressing as overhead line

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	in the first and second consultations that the pylons would be visible from within the Dedham Vale National Landscape (DVNL). We argue that the entirety of the Pylon line from Great Horkesley to Ardleigh is visible from within the DVNL, and therefore has a direct impact on the landscape character and natural beauty of the DVNL, for which it is still designated an Area of Outstanding Natural Beauty, albeit not by name. The proposed pylon line through Boxted follows a ridge of high ground, between the Colne valley to the south and Stour Valley to the north. The proposed pylons will be as tall as the Stour Valley is deep and dominate the entire landscape.	The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The fact that parts of the proposed 400 kV overhead line will be distantly visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant. The landscape the Project passes through within Boxted parish is classified as Great Horkesley Plateau Farmland. Topography is relatively flat at around 50 m AOD and the proposed 400 kV overhead line within Boxted parish is over 1.5 km from the southern edge of DVNL. Figures A13.5.6 to A13.5.12 contained within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility related to the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. For example, Viewpoint 4.36, Green Lane / Essex Way, Horkesley Green, is approximately 1.58 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 4.36 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3

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		of 4 [APP-231], pdf page 109. At this distance, effects are judged to be negligible and not significant (adverse) during construction, at year 1 and also year 15 of operation. The assessment of effects on a number of viewpoints within the National Landscape conclude that the visual effects of the overhead line outside the National Landscape would at most be minor adverse and not significant. This includes consideration of effects on Viewpoint 3.27, B1066 Park Road, near Thorington Street, which can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 151. Viewpoint 3.27 is approximately 4.80 km from the nearest above ground structure of the Project.
Planning Policy	Boxted has a Neighbourhood Plan (Redacted), within which Objective 2, seeks to protect and enhance the green spaces within the Parish, and Policy LC1 specifically deals with "Coalescence with Colchester Urban Area". In order to preserve the landscape character and avoid coalescence the policy states "... do not materially reduce the green gap between Boxted and urban Colchester...". The proposed Pylon line runs directly through this exact green gap that is intended to be preserved. With the development of the Colchester Northern Gateway Sports park, the green gap between Boxted and Colchester has already been reduced (albeit it's a sports park, but the	Pursuant to Section 104(3) of the Planning Act 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024). Paragraph 5 of the NPPF makes it clear that the Framework does not contain specific policies for developments requiring development consent and that applications for development consent are to be determined in accordance with the decision-making framework set out in the Planning Act 2008: <i>'The Framework does not contain specific policies for NSIPs. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).'</i> Policy LC1 of the Boxted Neighbourhood Plan states that <i>'Developments in Boxted parish which can be demonstrated to be sustainable and which do not materially reduce the green gap between Boxted and urban Colchester will be supported. This must reflect the requirements of Policy SB1 in respect of development outside of settlement boundaries'</i> The Project is routed through the Green Gap identified in Figure 5.2 of the Boxted Neighbourhood Plan. The Applicant notes that the objective of the policy is to ensure that the growth of Colchester urban area does not serve to reduce the gap between Colchester and Boxted, thereby eroding Boxted's function as a rural settlement. The proposed pylons constitute permanent vertical structures, they do not amount to settlement growth nor alter the defined edge of settlements. Accordingly, the scheme does not undermine the core objective of preventing coalescence.

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	development and the light pollution produced therein do encroach on the parish). The green gap that remains therefore is all those fields that lie on either side of Langham Road, Langham Lane and Straight Road, exactly all that land which the Pylons are proposed to cover. If this were a planning application at local level this would be a direct contravention of Boxted Neighbourhood Plan, policy LC1. If normal and fair planning law were to be applied to this proposal it would instantly be rejected.	While the NPSs remain the primary decision-making documents, regard has been had to any other matters of importance and relevance, which include relevant policies in the NPPF.
Landscape and Visual	Furthermore, this line of pylons where it crosses the Boxted Straight road, follows Langham Road and crosses Langham Lane will create a 'wirescape' and fails to comply with Holford Rule 6. It will be the only thing visible whenever entering or exiting Boxted, and many journeys to and from Boxted will involve crossing the pylon line more than once due to the sinuous nature of the road structure in this area. Although the proposed line crosses the	The Applicant notes Boxted Parish Council's concerns about the Project creating a 'wirescape'. Holford Rule 6 notes that <i>'in country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'</i>. A section of existing wood pole lines along Langham Lane would be removed as part of the Project. There are no other high voltage lines that would combine with the project to create a 'wirescape' in this location. The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define

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	DVNL is outside of the parish boundary of Boxted, Boxted considers itself a part of the entire DVNL. We are fortunate to have a small part of the DVNL within our parish, and therefore feel it is within our duty to protect and preserve the entirety of the DVNL as well as the surrounding countryside that serves as the backdrop to the Dedham Vale itself. The parish has received great support and funding from the DV National Landscape, particularly for the Boxted Wildlife Group that has endeavoured to raise awareness of our native flora and fauna and promote wildlife friendly initiatives. We are therefore horrified to learn of the proposed 120m wide swathes of destruction that will be wrought on the DVNL by the undergrounding of the cables.	our proposals that we take forward, and which are also informed by feedback. As mentioned above Holford Rule 6 relates to wirescape but it is not clear which other smaller lines the respondent considers to be contributing to a wirescape in terms envisaged in Rule 6. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226] identifies significant adverse residual visual effects. The assessment in relation to Boxted parish, including consideration of people traveling along local roads, is set out under Visual Receptor Areas (VRAs) VRA C8 Higham (paragraphs 13.6.83 to 13.6.94), VRA C11 Langham (paragraphs 13.6.122 to 13.6.137), D1 Tye Green and Boxted (paragraphs 13.7.1 to 13.7.12) and D3 Great Horkesley and Horkesley Heath (paragraphs 13.7.25 to 13.7.40) in Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. During operation (and maintenance) significant adverse effects are identified on receptors within 1.5 km of the overhead line in VRA D1, VRA D3 and VRA C11. The Applicant has addressed Boxted Parish Council concerns relating to effects on Dedham Vale National Landscape in previous responses in this document. 400 kV underground cable connections would require 6 trenches (each with 3 cables) over a width of around 55 m within a 120 m wide construction working area. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries.

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Landscape and Visual	In the vain attempt to reduce the visual impact to the human eye, the alternative has been deemed more favourable to physically destroy and disturb the very environment that we seek to preserve and hold in such high regard, being of "outstanding beauty". The two simply are not compatible, indeed neither option should even be considered. The powerline should simply not go anywhere near a National Landscape/AONB.	The Applicant notes the concerns raised by Boxted Parish Council. The Project has been designed to minimise effects on Dedham Vale National Landscape (DVNL); including consideration of the Project within the National Landscape and its setting. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant.
Biodiversity, Ecology and nature conservation and Biodiversity	The Boxted Wildlife Group surveyed several sections of hedgerow that fall within the DCO outline of the present proposal within Boxted. One section of hedgerow which is 70.4m long, and perpendicular to the pylon line falls entirely within the DCO and consists of 13 Oak trees ranging from 0.8m to 2m in diameter, therefore estimated at between 53 and 133 years old. There were also at least 4 other species of native hedging shrubbery in this hedge. Where the transmission line crosses	Full habitat surveys have been undertaken by competent ecologists across the Project over 2023-2025, including detailed hedgerow and tree surveys. The results of which are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. An assessment of impacts provided within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] are based on a reasonable worst-case scenario of tree and hedgerow loss, based on a standard overhead line and underground cable design. Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. 7.2 Outline Code of Construction Practice (Revision C) contains commitment GG14, which states '<i>Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural</i>

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	hedgerows at more acute angles, i.e. the hedgerows are almost parallel to the alignment, then the number of trees at risk in that row grows exponentially.	<i>features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.'</i> 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.
Consultation	Anecdotal evidence from residents either on-line (/within the DCO) or adjacent to it paints a story of even greater negligence of community engagement from NG. Residents report being confused and bewildered by a bombardment of impersonal and sometimes contradictory information regarding their land. Poorly drafted maps, maps with incorrectly labelled houses, shapes that don't make any sense and weirdly scaled maps are some of the communications they have received. All of which causes them confusion and concern about their property and a complete lack of a personal touch in discussing their land and property which has often been in the same family for	National Grid always aims to provide clear and concise mapping of the relevant landholding when in discussion with landowners and legends were provided on maps to assist navigation. All affected landowners were offered a meeting with Fisher German as part of the statutory consultation for the Project. At these meetings information / plans were shown to landowners, and the opportunity was given to provide feedback / change requests to be assessed by the Project team. Landowners were offered the opportunity to meet with Fisher German ahead of the general public consultation which allowed landowners the further opportunity to attend a consultation event and speak with other Project disciplines i.e. engineering, environmental and consents.

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	many generations, and a complete lack of clear and accessible options for how they should engage with NG.	
Health and Wellbeing	Negative impacts on the physical and mental health of these residents are therefore being caused now even before the construction phase has begun by this poor engagement and uncertainty around the project.	The Applicant recognises that major infrastructure proposals can give rise to concern and uncertainty for nearby residents, particularly during the preconstruction phase. An assessment of the potential impacts of the Project on mental health and wellbeing during the construction phase is outlined in Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The table identifies the importance of control as a protective factor for mental health and wellbeing (e.g. opportunities to influence decisions in the community / consultation processes) and environmental factors (e.g. control over the physical environment) and acknowledges the role that community engagement and communications will continue to play as the Project develops. The Applicant has sought to reduce concerns by sharing information with residents and stakeholders and will continue to engage with people potentially affected as the Project develops as set out in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation that local residents feel anxious about the potential impacts of the Project on quality of life (for example visual impacts on businesses and properties). Paragraph 10.7.130 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, but that the extent of the impact is not considered to be at a significant scale as to disproportionately affect health deprived populations.
Draft DCO	We are only too aware that we are being asked to respond to this consultation when there is no requirement for NG to submit this current plan as	Should the Applicant's application for Development Consent be given approval by the Secretary of State, the Applicant is required to deliver the proposals as consented. Where further approvals are necessary on detailed proposals, such as through DCO requirements, these will be approved by the relevant Local Planning Authority.

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	proposed today. We know that their final submission could be different and may not look anything like what has been consulted on.	
Land and property	To that extent we are aware of residents adjacent to the proposed DCO that are receiving communications suggesting compulsory purchase orders, even where their property doesn't currently sit "on-line", this suggests that NG have different plans than those that we are responding to. This behaviour is not conducive of a fair and rational consultation process and stokes considerable mistrust, anger and resentment in the local population towards this proposal.	Where residents have received communications referring to the compulsory purchase order, yet their property lies outside the Project's order limits, this is generally due to their classification as Category 3 (Cat 3) Persons with an Interest in Land (PIL). Category 3 interest applies to a person or organisation whose land is not directly acquired and over which no permanent rights are taken, but who may nonetheless be entitled to compensation if the authorised development gives rise to qualifying loss. A Cat 3 claim may arise only once the Development Consent Order is made and implemented, and where the claimant can demonstrate a causal link between the authorised development and the loss claimed. Such claims are assessed under the statutory compensation framework, including section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973, and section 152(3) of the Planning Act 2008. Importantly, Category 3 does not confer land rights, does not involve compulsory acquisition of land, and does not guarantee compensation. Any claim must be properly evidenced, relate to losses that are direct, demonstrable and not too remote, and is assessed on a case-by-case basis in accordance with statute.
Alternatives	Mitigations: BPC strongly believes that the best possible outcomes from this consultation are in order of importance: 1 Complete halt of this project and a holistic re-assessment of the entire supply chain of North Sea generated energy. None of this transmission should need to be across land when there are suitably connected	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.

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	brownfield sites, and coastal urban centres that could better receive the North Sea generated energy.	
Alternatives	2 Complete halt of this project and a re-assessment of landing sites for cables – how is the EACN justified. If it is removed from the scheme, then on a local level Bosted and the DV NL could be saved from this scheme, although we stand in solidarity with the rest of the region and demand option 1. 3 Comprehensive re-appraisal of transmission methods. Where transmission is required overland it should be by the least permanently impactful method, i.e. a method that leaves the least permanent impact on the landscape and on residents in proximity to it. This would therefore mean not using Pylons and not using AC undergrounding methods, the implication being therefore that HVDC is the preferred transmission method of those currently and technically available at present.	The Project Need case has two parts, to address boundary reinforcement needs and to connect two offshore windfarms and an interconnector. The policy compliant, economic and efficient solution (set out in the SOBR and 5.15 Design Development Report [APP-122]) has been demonstrated to be the Project being taken forward. Other alternatives, such as those utilising section EAS1 (in place of EAS2) see the SOBR) provide a means of meeting only the boundary reinforcement aspect of the need case at a lower cost. However with an estimated additional cost of £500m for the additional infrastructure to connect these windfarms and the interconnector this is overall less preferred to the Project National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAS 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault.

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Alternatives	4 Local mitigations may be possible if the scheme must proceed on the route that it is currently proposed to however they are very limited and have minimal benefit. Local Mitigations: Boxted is limited in the number of local mitigations that it can offer to National Grid for consideration. The route through Boxted has been chosen to avoid the need to destroy or compulsory purchase any households (that we know of at present). To request the route be moved either north or south of its current alignment would be to push it into more heavily populated areas. Specifically being between the DV NL to the north, and Colchester and the A12 to the south, the route has therefore been threaded through fields where there is only just enough space for it. As noted above this directly impacts the “green gap” between Boxted and Colchester, which is there to	Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant’s position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Extending the underground cable eastwards from the EACN side Cable Sealing End compound is not justified as there is no justification to move it in light of effects on the National Landscape and the requirements of 2.9.23 are not engaged. Whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant’s view is this is not justified.

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	serve a purpose: to be green! Directly to the west of Boxted as the route enters Great Horkesley it is proposed to go underground, having already just emerged from underground at Ardleigh, this leaves an unusually short stretch of pylons across Boxted and Langham. Notably this stretch of pylons is running across some of the highest ground in the area, a considerable breach of the Holford Rules, and would clearly be visible from the DV NL to the north, from much of Colchester to the south and from much of the Tendring peninsular to the east. It is illogical therefore that the undergrounding of the cable has not been extended from Ardleigh, across to the west of Great Horkesley where it is proposed to emerge, thus saving NG the need to build two additional Cable End Sealing Compounds and saving the public the need to see both those and the pylons. We accept that the construction method of the undergrounded route would be more destructive, but we have	

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	weighed up these harms in our response against the public opposition to seeing pylons and the deleterious effects of living next to or near them.	
Alternatives	Smaller scale mitigations such as a movement of individual pylons in one direction or another will do nothing to mitigate the harms we have documented. There are four listed properties within 250m of the DCO outline within Boxted, but as noted above these cannot be afforded any greater distance from the DCO without forcing the scheme onto and over residential properties to the south. Numerous hedgerows and trees within the DCO limits will not be saved by moving a pylon 50m north or south, as the assumption is that all will be cleared within the DCO to provide a "safe and level working site". The only possible, practical mitigation for Boxted were this scheme to proceed would be to underground the route through Boxted (all the way from Ardleigh to Great Horkesley), this would however be at the	Each of the Applicant's projects is evaluated on its own merits responding to the particular needs case and connection circumstances. As such, different technology outcomes should be expected to be present across the range of projects as indeed they are noted to be. In this case however the identified connection points that most economically and efficiently reinforce the network, for the ~6GW capacity required, lead to an onshore AC connection solution using predominantly overhead line. We provide further detail in responses above drawing from the Strategic Options Backcheck and Review [APP-357], which considered all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. The Applicant is progressing the appropriate scheme.

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	detriment of the environment which would suffer greater harms at the hands of the excessively destructive and disruptive AC undergrounding method, which would also cause permanent harm to the 50m wide permanent swathe that would be maintained above the cables, and the potentially greater temporary harms caused to residents and local traffic during the construction phase. Were all AC underground sections to instead be HVDC (or indeed the entire route be HVDC) then this would be greatly preferable due to the far smaller impact of this method. Policy Considerations: National Policy Statement for Electricity Networks Infrastructure EN-5 requires National Grid (NG) to appropriately consider alternative technologies, which would include offshore subsea routing. There is no evidence that NG has given it suitable consideration, only to write it off even before the first consultation. This in stark contrast to other well publicised schemes elsewhere in the	

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	country where NG have openly lauded the use of offshore cables or HVDC lines and documented in detail the benefits of them compared to conventional over-ground AC. Why then should East Anglia be subjected to the worst-case scenario if other regions are to benefit from less destructive and more sustainable methods of transmission?	
Good Design	Additional Considerations: • Holford Rule 7 states that alternative tower designs should be considered where they are visually advantageous. Again, we would have expected this to be implemented where it passes close to listed buildings and crosses or passes near to PRow. This has not been mentioned or offered as part of the consultation instead the simplest, largest and most impactful have been proposed with no optionality. • Holford Rule 5 stipulates that, where possible, pylons are placed in valleys, prominent ridges are avoided, woodland is avoided, and everything possible is done to protect woodland and	A standard lattice pylon is the starting point for any overhead line as guided by National Policy Statement EN5 (2024) and the consideration of the mitigation hierarchy. There are two locations where the Applicant is proposing to change to the low-height lattice design. These are Little Waltham (sheets 3 and 4 of 2.3 Works Plans - Section F [APP-022]) for heritage reasons and keeping heights below and out of the view of some gardens, and the other location is Thurrock due to technical reasons for the airfield (sheets 1 and 2 of 2.3 Works Plans - Section H [APP-024]). This is based on reducing heritage effect at Little Waltham and to support continued flight activity at Thurrock. For the section around Boxted and onwards to the EACN to the east and Gt Horkesley CSE in the west consideration of the level of effects from standard lattice pylons have been undertaken along with technical issues. In all areas the decision was taken to progress as overhead line using the standard lattice pylon. At Ardleigh the test at 2.9.23 may be engaged but various technical factors restrict the ability to adopt underground cable at specific locations and on balance the cable cannot be delivered. At the other location the tests are not engaged. The mitigation hierarchy seeks to respond to effects in a consistent manner in keeping with the policy in NPS EN5 and with duties to be economic and efficient as set out in the Electricity Act 1989. It is notable that the transitional changes in conductor configuration militate against just changing a small number of pylons from standard lattice. T-pylons are considered in locations where the mitigation hierarchy identifies that lattice pylons are unacceptable provided that the route characteristics are appropriate in terms of absence

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	hedgerows and safeguard visual and ecological links. Yet the proposed route through Boxted cuts through multiple field hedgerows and PRowS with ancient hedgerows. We cannot see any effort being made to protect visual and ecological links. Undergrounding as an alternative is even more abhorrent as it not only spoils visual character of the environment and landscape, but physically harms and destroys the landscape, hedges, watercourses, drainages and wooded copses through which it will need to be bulldozed.	of sharp direction changes and of infrastructure such as electrified rail line. The Applicant did not identify any locations that met this on the Project. The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
Biodiversity, Ecology and nature conservation	The 'East Atlantic Flyway' migratory bird route which covers this part of Essex has been recommended by the Department for Culture, Media and Sport as a site to be considered by UNESCO for World Heritage Status. This status, if granted, recognises places that are of "outstanding universal value to humanity" and should be protected. We have huge flocks of geese at	The proposed UNESCO World Heritage East Coast Flyway is largely defined by designated sites of International Importance including Special Protection Areas (SPA) for avian interest, Ramsar Convention Wetlands and Special Areas of Conservation. The effects on such 'European Sites', including an assessment on collision risk, is presented within the 5.3 Habitats Regulations Assessment Report [APP-082]. The Project is outside the Impact Risk Zone for most coastal European Sites, however the Stour and Orwell Estuaries SPA/Ramsar was considered at Stage 1 Screening and Stage 2 Appropriate Assessment within the 5.3 Habitats Regulations Assessment Report [APP-082]. Vantage point surveys did not identify areas of notable concern with regards to collision with overhead line sections within the Impact Risk Zone of the Stour and Orwell Estuaries SPA/Ramsar, however on a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at Ardleigh Reservoir.

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	risk of 'bird strike' if this pylon alignment were to proceed. The migratory birds descend into the AONB to make use of the River Stour. They gather in fields identified as undergrounding locations and compounds where the pylon line transitions to underground. In particular some of the proposed locations for the undergrounded cables to cross the River Stour are presently planned to be directly through large open wetlands adjacent to the Stour, which are not only havens for migratory wildfowl and other migratory birds but are also essential environments for a whole host of freshwater flora and fauna	Functionally linked land for lapwing and golden plover was identified in the vicinity of the River Stour through wintering bird surveys. This area is proposed for underground cabling. It was demonstrated at Stage 2 Appropriate Assessment, that there is extensive alternative habitat for these species within the River Stour catchment and as the works are temporary at this location (with habitats reinstated following installation of underground cables), there would be no adverse effects on the integrity of the Stour and Orwell SPA/Ramsar site. This conclusion was agreed with Natural England. Overall, the evidence indicates the Project does not pose a significant collision risk nor does it compromise established movement corridors for migrating and commuting birds.
Land and property	Compensation for homeowners needs to be considered at this stage, particularly if it has not yet been factored into cost estimates that have been used to rule out the offshore option to-date. The recent increases in the Bank of England base rate will be putting mortgage payers under significant pressure. Coupled with a 30% to 40% decrease in valuation of	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaully-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were

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	properties because of pylons nearby, some homeowners will simply be unable to secure a loan on their property at the point of remortgage. Unless compensation can be provided equal to the loss in valuation, some homeowners will be forced out of their property through no fault of their own	constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: - House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauly-Denny power line. - Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Air quality and emissions	NG has previously promoted this as a 'green project' but do not appear to have calculated impact to the environment or carbon footprint into the options appraisal. In addition to any direct impact on habitats, there will be a significant amount of CO2 released into the atmosphere during the manufacture and installation process – especially from concrete and not least from the very production of the steel pylons.	The fundamental purpose of the Project is to enable the connection of low carbon generation sources. 6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131] provides an assessment of the impact of both construction and operation of the Project on Greenhouse Gases (GHG). In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which would be used to reduce GHG emissions. The Green House Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project.
Consultation	Further comments on the consultation Process: The consultation asks us to rate the information NG has published in terms of how clearly it was	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had

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	presented and how easy it was to understand. It goes on to ask for further comments about the materials used in the consultation process and asks for suggestions as to how the consultation could be improved. Importantly, NG must improve its consultation by following the Gunning Principles for consultation, recognised in law.	specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Consultation	Thus far NG has failed to follow the Gunning Principles: a) The first Gunning Principle stipulates that the consultation must be at a time when proposals are still at a formative stage - yet this consultation has not reconsidered any decision which had previously been made. NG had decided on a route corridor initially; it had been predetermined. The same scheme was presented in the second consultation and has been presented again with only the most minor changes to the alignment in some areas. The fundamental objections to the scheme have been ignored.	See above response regarding the Gunning Principles
Consultation	b) The second Gunning Principle has yet again been	See above response regarding the Gunning Principles

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	breached in this consultation, as it was in the first and the second. We have simply not been given sufficient levels of information to enable us to make an intelligent comparison of the impacts of a scheme which would not involve pylons (offshore). The information provided should relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response. This simply has not been the case in this second non-statutory consultation, nor was it the case in the first.	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.
Consultation	c) "Community Newsletters" were only delivered with a nominal (minimal) distance of the proposed pylon alignment. Ideally, they should be delivered to every inhabitant of every parish through which the line passes or touches. Many may live more than a kilometre from the line but will pass by/under and be affected by it and the construction of it, on a daily basis. They deserve to be informed. Many people simply	Community newsletters were issued to every property within 1 km of the red line boundary, amounting to around 81,000 addresses. This approach was set out within the Statement of Community Consultation (SoCC). This was deemed proportionate, but the Applicant also wrote to all parishes along the route, as well as neighbouring parishes, and deployed a range of tactics – including social and traditional advertising to reach a wider audience. The approach was set out within the SoCC and the record of compliance with the SoCC is provided in 5.1 Consultation Report [APP-066].

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	do not know enough about the consultation.	
Consultation	d) Drop-in events were arranged at short notice, and many found it impossible to attend due to the timings; those commuting from London simply could not get to the venues by 7pm, similarly those attending College did not have an opportunity to attend a physical presentation to consider the hard copy plans at scale in detail. Similarly, there were no weekend drop-in sessions in our region making attendance even more challenging. This is, and remains, unacceptable and demonstrates contempt for those who seek proper engagement in the process, particularly as this was also a failing of last year's consultation.	As much as possible, consultation events were held with at least two weeks' notice after the opening of each consultation. Events were signposted via the community newsletter, the website, letters to stakeholder groups and through media engagement. In terms of timing, the Applicant aimed to hold events at a range of times on different days, including at weekends. To do so, the Applicant needed to balance a range of factors, including accessibility, venue availability and to ensure welfare. The Applicant recognises that not everyone will be able to make events, which is why webinars were held and recorded. We also have a hotline, email address and freepost address should anyone wish to talk to a member of the team. Regarding the point about hard copy materials, individuals could request copies of key materials from the project team.
Consultation	e) The age demographics of our community often make on-line access impossible. The Community Newsletters posted to households provided only a basic map of the whole proposed project with no detail and was difficult to interpret.	As set out in the Statement of Community Consultation (SoCC), individuals could make requests for hard copy information and maps via the community relations team. The community newsletter was designed to provide an overview of the project, but more detailed maps were available on request.

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	Many in our community therefore remain uninformed.	
Consultation	f) BPC requested large scale maps of our parish for use in community engagement. On two separate occasions these were forgotten about. When maps were finally sent, they were the wrong sheets and nothing to do with Boxted. When this was queried for a fourth time, the correct maps were finally sent, but far too late to be of any use to the parish.	The Applicant notes this comment. There were some issues with print and delivery but the Applicant aimed to ensure maps were delivered appropriately and on time.
Consultation	g) Bearing in mind the poor distribution of publicity, and the difficulty for many to attend drop in events and to read, understand and respond to the consultation, as with previous consultations, a low response from the public should not be interpreted as a lack of interest. Non-engagement in the consultation should not be interpreted as support for this project – instead it is evidence of NG's poor efforts at community engagement	The Applicant disagrees consultation was poorly published, information was poorly distributed, or that turnout and community involvement was low. More than 9,000 responses were received at statutory consultation, and more than 20,000 responses across three consultations when non-statutory consultations are taken into account. Furthermore, the Application does not consider non-responses are interpreted in any way.

2.8 Broomfield Parish Council

- 2.8.1 Table 2.8 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Broomfield Parish Council [RR-0416]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.8 Comments and National Grid's response

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Consultation	NORWICH TO TILBURY TARGETED CONSULTATION - MARCH 2025 RESPONSE BY BROOMFIELD PARISH COUNCIL Introduction (Question 1 and contact details) Broomfield Parish Council ('the Council' or 'the Parish Council') is a statutory organization representing approximately 4,500 local residents spread across 2,500 households north of Chelmsford, Essex. The Council is a statutory consultee for planning applications in the Chelmsford City district and takes a keen interest in all planning matters. We welcome the opportunity to comment on NGET's proposals and would be very happy to discuss our comments further with NGET. Our contact details are: Abi Wood (Clerk to the Council)	Noted. A response to the North-West and South-West of Chelmsford Parishes Group is provided in this document.

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	Parish Council Office, Broomfield Village Hall, 158 Main Road, Broomfield, Essex, CM1 7AH. Email: clerk@broomfield-pc.gov.uk Please note that the Council is part of a group of nine Parishes north-west and south-west of Chelmsford which has also made a response to the consultation. The Council has contributed to and entirely supports the response made by the Parishes Group. Therefore, most of this response has been reproduced from the Group response.	
Historic Environment	2. We wish to comment specifically about Essex 8 – the gap between Little and Great Waltham 3. In all its responses to earlier consultations, the Council has commented in detail on the significant harm that the introduction of OHL and pylons would have on this sensitive location. In brief, it is a narrow gap between two conservation areas, close to the Langleys Registered Park and Gardens, many listed buildings (including	The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting in Section F. During both construction and operation (and maintenance) phases, the settings of designated heritage assets such as the Great and Little Waltham Conservation Areas, the Registered Park and Garden at Langleys, the Scheduled Monument at Little Waltham, and associated listed buildings, have been thoroughly assessed. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The Applicant recognises that Section F is particularly sensitive, and that a number of permanent adverse effects (some of which are significant) are predicted for the historic environment in this area. This includes the potential for less than substantial harm to designated heritage assets. However, the assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect

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	Grade 1) and the site of a Scheduled Monument.	the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Landscape and Visual	The Council appreciates NGET's work in considering mitigations. The minor change of alignment to reduce impact on veteran trees and species, and the repositioning of TB 140 to reduce visual effects, is marginally better. However, taken overall, the Council does	As confirmed in the Applicant's Deadline 1 Cover Letter [REP1-141], two pylons extending south of the River Chelmer are now proposed as standard lattice pylons. Through adjustments within the Limits of Deviation these two standard lattice pylons replace three lower height design pylons and move the pylon away from the side of the property. To the north-west of Little Waltham a section of pylons north of the River Chelmer continue to be taken forwards as lower height lattice designs to reduce effects on the adjacent Langleys (Grade I listed building) and the adjacent registered park and garden.

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	not consider the mitigation proposed in this targeted consultation to be sufficient. Indeed, in this particular location, the Council believes it is overall rather worse than the Statutory Consultation proposals. This is because: The increased bulk and width of the lower height pylons offsets the benefit of the reduction in height. As noted in the Environmental Implications of Change, 'the benefit resulting from the reduction in height would be balanced out by the wider, heavier (in terms of steelwork) and more squat appearance of the lower height pylons' in relation to closer views. This is borne out by the photos in the Visualisations.	
Historic Environment	It is important to remember that the whole area of Little and Great Waltham contains high value historic assets. It is not enough to significantly mitigate only the views from behind Langleys House, important though that is. There needs to be significant mitigation across the full range of historic assets affected. Therefore, the Council	The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting. 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] concluded lower less than substantial harm for Great Waltham and Little Waltham Conservation Areas during construction and operation phases of the Project. The Applicant still considers this assessment to be appropriate for the reasons set out in the assessment. The assessment concluded mid less than substantial harm during construction and operation to Langleys Registered Park and Garden. The residual environmental effects fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further

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	cannot agree that the new design achieves 'less than substantial harm' in the context of Policy EN1. It also involves siting pylons even closer to some homes, especially Windmill House.	critical national priority presumption in favour of the Project applies to the planning balance and outweighs such residual effects. Windmill House is located in Great Waltham Conservation Area (CA55). This building is not identified as a non-designated heritage asset in any of the sources on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]; therefore, it has not been considered individually in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] or 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. For more details regarding this please refer to the Local Impact Report response to Chelmsford City Council (paragraphs 8.209 – 8.210 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]). The Applicant has reviewed this building and concludes it would be of low value. Embedded and standard mitigation proposals for designated heritage assets are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed,

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		National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.
Landscape and Visual	A significant adverse effect is the placement of a pylon right next to Chelmsford Road which has an overbearing impact on pedestrians [...]	The Applicant notes the concern raised by Broomfield Parish Council. The Project crosses over Chelmsford Road, just outside of the Broomfield parish boundary, near Minnow End. The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, including those along Chelmsford Road near Minnow End. The effects are explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on visual receptors, which include pedestrians and people travelling in vehicles along the busy Chelmsford Road, are set out under Visual Receptor Area (VRA) F3 Great Waltham and VRA F4 Little Waltham in paragraphs 13.9.25 to 13.9.50 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant visual effects are identified on visual receptors within 1.5 km, including from Chelmsford Road.
Traffic and Transport	and vehicles that use the busy road	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Suffolk County Council for approval post consent.
Landscape and Visual	The new design offers no net benefit in terms of Landscape and Visual. As the Environmental Implications of Change document notes: 'Overall, whilst there are some benefits and disbenefits, there would be no change to the type	The Applicant assumes this comment is related to the targeted consultation. The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the Environmental Impact Assessment (EIA). The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁵.

⁵ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

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	or significance of landscape and visual effects as a result of the proposed change'	The assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under Central Essex Farmland LCA (paragraphs 13.3.654 to 13.3.678), Chelmer Valley LCA (paragraphs 13.3.699 to 13.3.717) and Chelmsford & Environs LCA (paragraphs 13.3.718 to 13.3.735). Significant landscape effects are reported within approximately 1.5 km of the Project in the Central Essex Farmland LCA, Chelmer Valley LCA and within approximately 0.5 km of the Project in Chelmsford & Environs LCA. The assessment of visual effects considers effects on the visual amenity of people or visual receptors. Effects on visual receptors in relation to Broomfield parish are set out within Visual Receptor Area (VRA) F4 Little Waltham (paragraphs 13.9.38 to 13.9.50), VRA F5 Chignall Smealy (paragraphs 13.9.51 to 13.9.62) and VRA F6 Chelmsford North-West (paragraphs 13.9.63 to 13.9.74) in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant adverse effects on visual amenity would be experienced within approximately 1.5 km of the Project; this includes the western edge of Broomfield. Effects on receptors beyond 1.5 km would not be significant due to distance and the filtering and screening of views by vegetation and buildings within settlements. Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.
Alternatives	The Council therefore maintains its existing position that other forms of mitigation are needed. As explained in our responses to earlier consultations, these could include: - Undergrounding the entire Norwich to Tilbury line by HVDC cabling. The Council believes this would be entirely	The Applicant considered high voltage direct current (HVDC) as an alternative in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and HVDC options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base).

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	appropriate – as would HVDC offshore cabling Undergrounding the line by HVAC cabling just in this location, noting that such End Sealing Compounds need to be located in places that minimise impact on the area Re-examining the options for the line around Chelmsford. As explained in our last response, the introduction of undergrounding 132kv lines where needed to make way for Norwich to Tilbury opens new opportunities for routing which it appears were not fully considered in 2022.	The same methodology is used by the Applicant to assess strategic options applying the same set of cost considerations for all projects in England and Wales and as used in Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357]. This also sets out the lifetime cost issues addressed by our methodology, including maintenance costs for each technology. Appendix C: Technology Overview of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] provides detail of each technology. The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out in the economic appraisal in 7.19 2023 - Strategic Options Backcheck and Review [APP-357]. The following costs were set out at Issue Specific Hearing 1 with all data from [APP-357] and all cost information is in Appendix D: Economic Appraisal of [APP-357]: • Wholly Overhead Line — Project Total: £894.50m • Wholly 4-Ended HVDC Option Project Total: £5,854.50m • Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m • Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 11 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] states: <i>'Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'</i> The Applicant has set out the consideration of HVDC. 7.19 2023 - Strategic Options Backcheck and Review [APP-357] sets out why the Applicant's Project was taken forward following the assessment.
Consultation	In connection with this last point, the Council is disappointed that the continued	The meeting held in July 2024 formed part of the Applicant's wider programme of engagement during the development of the Project and provided an opportunity to

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	dialogue with NGET about alternative routes in the Chelmsford area has still not taken place. In July 2024, it was agreed to continue this dialogue in the Autumn but, despite several reminders, no meeting dates were offered.	discuss local issues and considerations relevant to route selection. While no further meetings took place, the Applicant continued to listen to and consider feedback throughout both non-statutory and statutory consultation. Many of the changes presented at statutory consultation were informed directly by feedback received during the 2022 and 2023 non-statutory consultations. Ongoing engagement focused on the evolution of the proposals, including the 2024 preferred draft alignment, pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation, changes to the route since the previous consultation, and matters relating to access and permanent and temporary haul roads.
Historic Environment	The Council are surprised and disappointed that the Broomfield Late Iron Age/Romano-British archaeological site has not been taken into consideration. In its response to the 2024 consultation (Q.12, para. i), the Council made a strong case for a minor change of alignment which would move pylon TB146 (2024 numbering) and three neighbouring pylons slightly further away from this important site. For ease of reference, the Council's suggestions are reproduced below. Please refer to Q.12 para I of our 2024 consultation response for full details. The Council believes this minor alignment change would be entirely appropriate to the scope of the targeted	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including archaeology. The Applicant fully recognises the importance of safeguarding archaeological remains such as the Brookfield Late Iron Age/Romano-British archaeological site, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order (Revision C) already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to archaeology, including methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] and in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground - Overview, 5.9.1-5.9.12 and 5.9.14 [APP-088 to APP-100 and APP-102]). The Applicant is committed to ensuring that all necessary mitigation measures in this area will be appropriate and effective, informed by ongoing assessment and in consultation with Historic England and relevant Local Planning Authorities' heritage advisors. This will ensure the protection and recording of archaeological remains throughout the Project.

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	consultation and requests that this omission is re-considered.	

2.9 Bunwell Parish Council

2.9.1 Table 2.9 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Bunwell Parish Council **[RR-0422]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.9 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	1. Statement of opposition Bunwell residents overwhelmingly oppose National Grid's proposals for its Norwich to Tilbury project. We, the Parish Council, therefore object to this project in its current form. The primary reason for our objection to the project in its present form is the real potential for significant and lasting harms to the village and its parishioners, listed below.	The Applicant notes the objection and the feedback provided. The Applicant responds to the specific points of objection in the rest of this table.
Alternatives	2. Alternatives to the proposals For the transmission of power from offshore wind farms: the most acceptable option to the majority of Bunwell parishioners is an integrated offshore grid. The second most acceptable alternative is undergrounding. We ask for a full assessment of the costings of these three schemes to be	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

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	given thorough scrutiny by the Planning Inspectorate.	
Landscape and Visual	3. Landscape quality The presence of industrial structures in the otherwise unspoilt landscapes of Bunwell Hill and Low Common will be immensely damaging to those who live in the area and those who use it for recreation. At a local level the landscape and views are highly valued. In supporting document 13.4.50, National Grid describes how landscape is particularly important when viewer's attention is focused on the landscape by users such as cyclists, walkers and horseriders. Bunwell Hill and Low Common are extensively used and enjoyed by these groups.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project raised by Bunwell Parish Council in respect to Bunwell Hill and Low Common. The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, including within Bunwell Parish. The effects are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The methodology for considering the sensitivity of people's views is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. People engaged in outdoor recreation (including users of cycle routes, footpaths, public rights of way and Quiet Lanes / Protected Lanes whose interest is likely to be focused on the landscape) are considered to be of high susceptibility, as set out in Table A13.1.8. The value of views is set out in Table A13.1.9. Effects on recreational receptors in Bunwell Parish, including cyclists, walkers and horse riders, are considered as part of the assessment of effects within Visual Receptor Area (VRA) A5 Tacolneston and VA A6 Forncett St Peter in paragraphs 13.4.49 to 13.4.71 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Recreational receptors are identified as being of high susceptibility and local / community value. Significant visual effects are identified for visual receptors within approximately 1.5 km and extending beyond this at Bunwell. Please also see the Description of Effects for Viewpoints 1.07 (PRoW South of Forncett End (Forncett FP28)), 1.18 (PRoW north-east of Bunwell (Bunwell FP2)) and 1.20 (Bunwell Village Hall) in Annex A (Viewpoint Assessment) of [APP-229], which consider views towards Bunwell Hil and Low Common.
Landscape and visual	In supporting document 13.3.125 onwards National Grid describes the impact on the Tas Valley Tributary Farmland	Effects on Landscape Character Area (LCA) B1 Tas Valley Tributary Farmland are set out in paragraphs 13.3.111 to 13.3.125 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] . The Applicant confirms that major and significant (adverse) effects would be experienced within approximately 0.5 km

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	in which the affected part of Bunwell is sited. They state that the effects during the construction period are 'major and significant and of a high magnitude' within 0.5 km of the transmission line proposed. In operation, the effects are said to be 'significant and irreversible'. At up to 0.5 km they are 'major and significant'. At up to 1.5 km they are 'moderate and significant'. (Table A13.2.11). This projection is still to be the case after 15 years of operation of the project.	of the Project, reducing to moderate and significant (adverse) between approximately 0.5 km and 1.5 km. The duration would be long-term, and the effects would be irreversible. Beyond 1.5 km effects are judged not to be significant.
Landscape and Visual	It appears that no screening or landscaping is proposed to counteract landscape harms. We consider both the damage to a prized landscape and the lack of any proposals for landscape mitigation to be unacceptable. N.B. Please note that the Bunwell viewpoints published in National Grid's supporting documentation are wholly inadequate. Fig 7.12.F18_VP1.20b gives a current view from the village hall but does not include a view with the transmission line	Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. As set out in Table A.1 LVIA Viewpoints on page 395 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229], Viewpoint 1.20 has been produced as a baseline photograph only and does not include the Project as a wireline or visualisation. The photographs labelled 1.20b and 1.20c are taken from the same location (Viewpoint 1.20) and show different angles of view. Although Viewpoint 1.20 is taken from the local PRoW network south of Bunwell Village Hall, is it representative of views of people visiting the village hall, using the playing field and local PRoW network in this area.

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	added. Fig 7.12. F18_VP1.20c states it is a view from the village hall when it is not.	
Landscape and Visual	4. Proximity to dwellings 4 x dwellings in Bunwell are to be within 200m of a pylon - 1 and 2 Banyards Hall Cottages and East and West Barns. To be this close to the transmission line is stated by National Grid to be a 'significant negative'. However, National Grid has evaluated the settings of these dwellings and concluded that 'no instances have been found where effects on Residential Visual Amenity would be so great that they would affect living conditions and render these properties unattractive places to live'. (Doc ref 13.6.3). Residents of these properties beg to differ. All the residents of Bunwell Hill and Low Common (approximately 100 households) will live within 1.5 km of a pylon, with the above mentioned 'significant' effects likely to negatively impact their enjoyment of what is otherwise unbroken, unspoilt countryside.	The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. Effects on residents in Bunwell Hill and Low Common are set out under Visual Receptor Area (VRA) A5 Tacolneston and A6 Forncett St Peter in Section 13.4 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant visual effects are identified for visual receptors within approximately 1.5 km and extending beyond this at Bunwell. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact, and it recognises that there will be adverse visual impacts for certain properties within Bunwell. Of the properties mentioned, the assessment concludes that 1 and 2 Banyards Hall Cottages, and East Barn are likely to experience a medium magnitude of visual change as a result of the Project. Views from West Barn are expected to experience a high magnitude of change, with the detailed assessment stating that the Project would be clearly visible from the south-western and north-western elevations of this property. However, judgement as to whether impact on visual amenity would be so great that it may breach the Residential Visual Amenity Threshold (RVAT) has been informed by 'Landscape Institute Technical Guidance Note (LI TGN) 2/19 Residential Visual Amenity Assessment (RVAA)', which considers effects on views from a property 'in the round', and, based on this guidance, no instances of a breach of the RVAT are anticipated in Bunwell.

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Biodiversity, ecology and nature conservation	5. The natural environment a) Removal of trees 46 x trees are to be destroyed by the proposed works in Bunwell. Others are to be potentially affected or affected/managed. Between RG45 and RG46 15 x oak trees, part of an avenue of 60 x oak trees leading to Grade II listed Banyards Hall, are to be removed with a further 8 x oaks to be potentially affected or affected/managed. Also, between RG45 and RG46, off Low Common Road, 16 more trees are to be removed, with a further 4 potentially affected/managed. See Doc Ref 7.4.F1 p26. Between RG49 and RG 50, in an area of particular ecological importance, 3 x veteran trees are to be potentially affected or affected/managed. 2 of these are in an area covered by a tree preservation order. 6 x other trees within the area covered by the preservation order are to be removed and a further 3 are to be affected or affected/managed. See Doc Ref 7.4.F1 p27. In their supporting documentation (at	a.) Commitment GG14 in 7.2 Outline Code of Construction Practice (Revision C)] states '<i>Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.</i>' This will give further consideration to the avenue trees with the possibility of crown management to restrict tree height. Management options for veteran trees are provided in Table 5.1 of 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP2-018]. Options for veteran tree management are to be agreed with landowners and the relevant Local Planning Authority in the final Landscape and Ecological Management Plan with the aim to manage the trees rather than remove them. Management options include crown pruning in order to retain the trees below the overhead lines.

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	13.5.14) National Grid states that the residual arboricultural effects of the project are 'major adverse' and 'significant'.	
Biodiversity, ecology and nature conservation	b) Destruction of wildlife habitat The loss of habitat caused by the removal of trees and hedgerows in a particularly quiet and unspoilt area of our parish will lead to unacceptable habitat loss and damage to species. We note in supporting document 6.8.A10 Bat Activity Report that two peak areas for bats have been identified in our village between RG 49/50. These are red zones for barbastelle bats, requiring further investigation for the presence of roosts. The proposed works at Bunwell Hill are adjacent to a county wildlife site. The area between RG49 and RG50 is subject to multiple special designations and protections and is entirely unsuitable for this project. The project as designed will do untold ecological harm. See map of this area: Doc Ref 7.4.F1 p27.	b.) Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on important ecological features; including designated sites, priority habitats and protected species. These important ecological features have been identified following a suite of ecological surveys between 2022-2025, including airborne species such as bats. All ecological impacts have been assessed in full within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Further bat roosting surveys have been undertaken around RG49-RG50 over 2025, however no confirmed bat roosts were identified within any trees due to be impacted by the Project in this area. Full details of these surveys can be found within 6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034]. Bat activity surveys were also undertaken between RG49-RG50, with the use of static detectors, which did identify this area as valuable for barbastelle bats commuting and foraging. Appropriate mitigation has therefore been put into place, as agreed with Natural England and the Local Planning Authorities, in the form of bat flyways. Bat flyways will ensure a continuous feature is present during construction to allow continued use by bats in the area. Full details on the proposed flyways can be found within 7.4 Outline Landscape and Ecological Management Plan (Revision D) and specifically 7.4 Outline Landscape and Ecological Management Plan Appendix E - Bat Flyway Locations [AS-048]. The two County Wildlife Sites (CWS) in the area have both been avoided by the Project; Carlton Rode Fen CWS and Brick Kiln Lane, Bunwell Hill CWS. Full details on impacts on CWS's are presented within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. No significant residual effects on any ecological features have been identified.

Topic	Comment	National Grid's response
Historic Environment	6. Heritage The settings of 4 x Grade II listed houses - Ebenezer Cottage, Banyards Hall, Wood Farmhouse and Quaker's Farmhouse (locally known as Quaker Farm) are all considered to be impacted by the construction and operational phases of the project. During the statutory consultation period, National Grid reported the long-term effects on the settings of Banyards Hall and Quaker's Farmhouse to be a 'significant negative'. This assessment has now been downrated to 'low adverse', without any changes to the configuration of the project. (Doc Ref 6.11. A2). These two Grade II listed homes are to be within 250 m of the draft order limits. Their setting is to be drastically altered. No mitigation is proposed.	The Applicant has reviewed the assessment of Banyard's Hall and Quakers Farmhouse in light of the parish council's comments. The Applicant acknowledges that the Project will introduce pylons and wires to within 250m of these assets. The setting of both assets is informed by the surrounding agricultural landscape with which they have historical and functional relationships. The rural landscape surrounding the two assets will remain in place beneath and around the proposed overhead line. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (during operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate for both assets. At the Preliminary Environmental Information Report (PEIR) stage of the assessment process it was proposed that Banyard's Hall might experience a significant negative effect during the operation phase of the Project, however, through further consideration and assessment, it is now concluded that the asset will experience a permanent minor adverse significance of effect (not significant) during the operation phase. This is because due to screening by associated farm buildings and the mature tree cover of the asset's grounds and in the intervening landscape, the Project would only be occasionally visible. The Project would, therefore, result in a small change to the setting of the asset.
Noise and Vibration	7. Harms of the construction period a. Noise The working hours of the project are Mon to Fri 7.00 to 19.00 and	The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) are: - Monday – Friday: 07:00 to 19:00 - Saturday, Sunday and Bank Holidays/Public Holidays: 07:00 to 17:00.

Topic	Comment	National Grid's response
	Sat/Sun/Bank Holidays 7.00 to 17.00.	Details relating to the proposed construction working hours and any associated restrictions are presented in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C). The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The construction working hours set out in 3.1 Draft Development Consent Order (Revision C) define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in 7.2 Outline Code of Construction Practice (Revision C). The inclusion of Sundays and Bank Holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer term exposure to construction impacts. A blanket prohibition on Sundays/Bank Holidays would materially harm the deliverability of this critical national priority project. The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters; this includes the core working hours for the construction phase of the Project.

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		6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated.
Noise and Vibration	Some dwellings, especially those in the proximity of RG 44-46, are extremely close to the haul road and working areas. The noise of construction traffic and works - in what is currently a completely tranquil rural setting - will be highly significant, with serious potential for harm to the health and wellbeing of residents.	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in Bunwell in relation to noise and vibration from pylon construction with appropriate mitigation measures. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Transport and Traffic	b. Traffic disruption The network of small roads in Bunwell Low Common is to be significantly affected by the proposed works because the haul road is to cross these roads in two places. Low Common Road and Tabernacle Lane are to be subject to closure during the works. The extent of these closures is not apparent, but to close these	Low Common and Tabernacle Lane are subject to temporary closure for activities including the proposed construction of the crossover bellmouths and netting installation activities to enable overhead line stringing. The temporary closure may end up not being required at all and the interface with the public highway being managed through Temporary Traffic Management. However, for the purpose of the DCO, we have made a worst case assumption that the temporary closures for the crossover bellmouths are for a short term duration of less than four weeks at each location and for the netting activities will be less than 12 hours, or could occur overnight. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.

Topic	Comment	National Grid's response
	two roads in any significant way - especially if both are closed at the same time - will prevent residents of Low Common accessing the B1113, and local amenities such as the school, church, village hall and village store. The diversion routes shown in National Grid's supporting documentation will lead to significantly longer journeys and associated inconvenience. Furthermore, in periods of heavy rainfall these diversions are not suitable as they lead over unbridged river crossings which are often impassable. This is a significant concern.	Temporary road closures where diversions are necessary are expected to be for a duration of up to four weeks. When considered in the context of other major infrastructure projects, this has been considered to have residual effects for driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The diversions for the temporary closure of Low Common and Tabernacle Road are shown on Section A, Plan C of the 2.5 Access, Rights of Way and Public Rights of Navigation plans [APP-033]. The Applicant has proposed the diversion routes as the most suitable and closest routes to minimise the length of re-routing. The Applicant is proposing to use the Permit Schemes (as applied by Article 12 (Application of the Permit Schemes) of the 3.1 Draft Development Consent Order) that are in place and operated by the relevant Local Highway Authority to coordinate the street works required for the Project. The Applicant anticipates that both roads will not be closed simultaneously. As detailed in section 5.10 of 7.3 Outline Construction Traffic Management Plan (Revision B), the police, fire and ambulance services (referred to as 'blue light services') will be given written notice of planned temporary lane or road closures. As set out in section 5.4 of the 7.3 Outline Construction Traffic Management Plan (Revision B), in the event of any incident occurring which impacts on the safe and efficient operation of the road network, additional mitigation measures will be considered, which could include contingency routes. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant Local Highway Authorities and the police. With respect to the concerns about flooding and unbridged river crossings, the Applicant will engage further with the Local Highways Authority on this. .
Transport and Traffic	Highway safety The roads in Low Common allocated for diversion - Hall Road and Low Road - are especially narrow, with steep banks, blind bends and few, small passing places. They are used extensively by walkers, dog walkers, cyclists and horseriders - including	Where diversions are necessary (due to temporary closure of roads), it is anticipated that the Applicant will adopt the principle that the diversions will use the same standard of road or higher where practicable and available. Roads of a higher standard are not available in this location. Based on the assessments undertaken, the Applicant is satisfied that Hall Road and Low Road are of an equivalent standard to those required to be temporarily closed. The use of Hall Road and Low Road as a diversion route is therefore considered acceptable for a managed short duration closures. Any diversion will be carefully managed with temporary diversion route signage provided, warning signage for all road users and community engagement, and will be of limited duration to reduce

Topic	Comment	National Grid's response
	groups of children riding from Hot to Trot Equestrian (Low Road). These roads are currently little used by vehicles. Additional vehicles on them will put the aforementioned groups at risk, especially when footpath closures (see information below) will force recreational walkers and dog walkers onto the road network.	impacts where practicable as outlined within Section 5.8 (Traffic Management) of 7.3 Outline Construction Traffic Management Plan (Revision B). Therefore, the Applicant proposed to use these diversion routes, unless otherwise agreed with the Local Highway Authority. As detailed in Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing to use the Permit Schemes, to minimise disruption and reduce the probability of conflicting road closures taking place concurrently. Section 5.8 of 7.3 Outline Construction Traffic Management Plan (Revision B) includes a commitment that where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Although there may be residual effects for all road users along the planned diversion routes, the impact of these will be minimised by the proposed mitigation and commitments within the 7.3 Outline Construction Traffic Management Plan (Revision B) as outlined above and are therefore not considered significant. The principles of the proposed diversion routes have been shared with the Local Highway Authority and the Applicant will continue to engage with them on this matter.
Socio-economics, Recreation and Tourism	Curtailment of leisure activities 6 x Bunwell footpaths are to be subject to temporary closures - FP8, FP10, FP12, FP14, FP17, FP18. Stated periods are for up to a month, or in the case of the haul road, 'for the duration of the works'. Supporting doc 7.6 Table 8.3 refers. During these temporary closures residents in the hamlets of Low Common and Bunwell Hill will lose access to almost all their available footpaths. Because of the location of haul roads, they will essentially be cut off from accessing the remainder of the	The Applicant notes the concern regarding Bunwell Footpaths 8, 10, 12, 14, 17 and 18. As set out in the 7.6 Outline Public Rights of Way Management Plan [APP 329], all affected PRoW would remain accessible throughout construction either through managed access on their existing alignment or through appropriate temporary diversions. No PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the listed PRoW, the table referenced notes a 'Temporary Closure (Managed)' regime will be used on all of them, meaning they will remain accessible throughout construction on their existing alignment under a managed access regime, rather than being subject to full temporary closure. Where these PRoW intersect with working areas or haul roads, appropriate safety measures will be implemented to allow continued safe passage for PRoW users during construction of The Project. This may include gated access of the PRoW, or haul road, or other appropriate measures, brief holding of users while a specific construction activity is paused to allow safe passage, or directing users safely around a localised working area where necessary.

Topic	Comment	National Grid's response
	village by foot - including the school, church, village hall and playground. This is an unacceptable scenario. Mitigation Should the project be accepted by the Planning Inspectorate, we ask that National Grid and its contractors work with Bunwell Parish Council, our District and County Council, farmers, other local businesses, bus companies (including school bus contractors) and the residents of Bunwell to minimise the disruption of its activities.	Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan to be submitted to, and approved by, the relevant planning authority. All PRoWs temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on community facilities (e.g. schools), sports clubs, recreational land and recreational routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include: traffic management, signage and routing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.2 Outline Code of Construction Practice (Revision C); 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Bunwell Parish Council in the assessment. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. As noted in Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B), members of the community and local businesses will be kept informed regularly of the works through active community liaison. A free contact number will be provided, which members of the public can use to raise any concerns or complaints about the Project. The Community Liaison Officer will engage with key stakeholders and the local community to keep informed of any planned community events, so the Project can avoid these wherever practicable when scheduling any construction activities that may

Topic	Comment	National Grid's response
Landscape and Visual		cause disruption. It is anticipated that periods of high volume traffic will also be communicated by the Community Liaison Officer.
	Additionally, we ask for a comprehensive programme of landscape mitigation.	The Applicant has set out how the mitigation hierarchy has been applied to the Project in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and other application documents including the 5.6 Planning Statement [APP-085]. Whilst compensation is part of the mitigation hierarchy, National Policy Statement (NPS) EN-1 (2024) or NPS EN-5 (2024) do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines <i>‘and the impossibility of full mitigation in these cases does not countermand the need for overhead lines’</i>. It is particularly noteworthy that none of the policies on landscape and visual effects in EN-1 or EN-5 expressly mention compensation. This is in contrast to the other NPS policy sections, e.g. on biodiversity, where the provision of compensation is expressly referred to. The residual landscape and visual effects that remain following the application of the mitigation hierarchy therefore fall to the planning balance in accordance with the EN-1 and EN-5 policy framework, including the further critical national priority presumption in Section 4.2 of EN-1. The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs). There is no requirement under the said Regulations for all residual effects to be compensated. The above aligns with the made Bramford to Twinstead Development Consent Order, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects.

2.10 Chignal Parish Council

- 2.10.1 Table 2.10 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Chignal Parish Council **[RR-0554]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.10 Comments and National Grid's response

Topic	Comment	National Grid's response
Land use	The Pylons should not pass through this beautiful agricultural landscape.	The Applicant has taken into consideration the location of existing land uses in establishing the baseline as part of the routing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement (NPS) EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction across the Project, including across Chignal Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on

Topic	Comment	National Grid's response
		landscape receptors within Chignal Parish are set out in paragraphs 13.3.654 to 13.3.678 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Central Essex Farmlands Landscape Character Area (LCA). Significant adverse landscape effects are reported up to 1.5 km from the Project. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.
Land and Property	Every home owner will lose value of their property.	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
Alternatives	A sea route allows for simple additions as wind power expands.	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
Land use	We will need every bit of land to either grow food or provide housing.	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Chignal Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Health and Wellbeing	Health concerns about the power lines and how bad weather can knock the lines down.	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing Electric and Magnetic Fields (EMFs), which are incorporated into the decision-making process for development consent in National Policy Statement (NPS) EN-5 (2024). These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around EMFs and health. After decades of research into EMFs and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in 7.8 Electric and Magnetic Field Compliance Report [APP-330]. The Applicant's 400 kV overhead lines are designed to remain robust and operational in the worst weather conditions in the UK. Although overhead lines are more susceptible to

Topic	Comment	National Grid's response
		disruption from lightning and high winds, the overhead line structures do include an earthwire at the top of the pylons which is designed to shield the electrical conductors from lightning strikes. In the event that a conductor is struck by lightning, the electrical system has in-built protection that allows millisecond speed returns to service in the event of a strike. They are also comparatively easy and cost-effective to repair and maintain compared to underground cables. The majority of the Applicant's existing transmission network is constructed from overhead lines. These are a demonstrated and reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example, with regard to climate change) would need to be applied to the entire network. At this stage no known changes are required for a new overhead line project. Unforeseen events of sufficient severity to cause damage to infrastructure are very rare in the UK but do occur. Overhead lines could be subject to adverse weather conditions such as high wind speeds and lightning strikes. In the unlikely event an overhead line was to be damaged, a network-wide monitoring system would detect the fault almost immediately and the circuit would be tripped, and the live current stopped. At the point of repairing any damage, overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology. We also undertake regular ground-based inspections of the overhead line using thermal imaging to assess damage to the overhead line and utilise helicopters and drones equipment with high definition and thermal imaging cameras to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.
Alternatives	Sea is safer. quicker and ultimately lower impact on the environment. The impact on the local economy through traffic congestion and pollution is removed by going through the sea route.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons

Topic	Comment	National Grid's response
		are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
N/A	This document is the registration of a representation from Chignal Parish Council concerning the proposed National Grid Electricity Transmission (NG-ET) project for overhead pylons from Norwich to Tilbury, a Nationally Significant Infrastructure Project, to the Planning Inspectorate. It emphasises the council's OBJECTIONS to the project, primarily due to environmental, landscape, community, and heritage impacts, and calls for a more strategic, technologically advanced, and environmentally sensitive approach to transmission infrastructure planning in East Anglia.	The Applicant notes the respondent's feedback.
Socio-economics, recreation and tourism	EFFECTS OF THE N2T PYLONS ON CHIGNAL PARISH The council supports renewable energy but opposes electricity transmission by overhead pylons due to the long-term harm that it will bring to rural communities and unspoilt historic landscapes.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project would potentially impact the local economy, local

Topic	Comment	National Grid's response
		employment, tourism economy, community facilities, businesses, recreational and tourism activity and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Chignal Parish Council in the assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance⁶. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Chignal Parish. The impacts of the Project on Chignal's historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 -

⁶ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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		Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors within Chignal Parish are set out in paragraphs 13.3.654 to 13.3.678 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Central Essex Farmlands Landscape Character Area (LCA). Significant adverse landscape effects are reported up to 1.5 km from the Project. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.
Land use	The project would have a harmful impact on the viability of extensive areas of high-value agricultural land, in the parish, mostly 'Best and Most Versatile' Grade 2 land.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Chignal Parish (predominantly Grade 3a with small extents of Grade 2 and Grade 3b). National Grid has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. Policy recognises that opportunities to fully mitigate impacts on existing land uses may be limited. Even so, impacts on land use and farming operations have been carefully considered and reduced as far as practicable.

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		Construction will result in temporary disruption to some agricultural land, but land take will be strictly limited to what is necessary, and use of farmland will be minimised wherever it is safe and reasonable to do so. Soil management measures to be implemented during construction across the Project, including across Chignal Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. National Grid continues to work closely with affected landowners and farmers to understand and manage impacts on individual holdings. All temporarily used land will be reinstated, with compensation available for loss of income, and disruption during construction will be minimised through established good practice.
Landscape and Visual	The parish sits within the Pleshey Farmland Plateau Chelmsford Character Landscape which has a 'strong sense of tranquillity' as a key characteristic. 'The views within the area vary from open views over the arable farmland on the highest land to the enclosed views in the valleys in the south of the area'. It is noted that 'the erection of new farm buildings on the higher areas, could be conspicuous on the skyline.' Any new development in this character landscape area should be small-scale,	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project raised by Chignal Parish Council. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement (NPS) EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. Effects on landscape receptors within Chignal Parish are set out in paragraphs 13.3.654 to 13.3.678 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Central Essex Farmlands Landscape Character Area (LCA), which incorporates Pleshey Farmland Plateau landscape. One of the key characteristics is the 'mostly tranquil character away from major roads'. As

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	responding to the historic settlement pattern, landscape setting and locally distinctive building styles. The erection of 50m high steel lattice pylons and cables would have a damaging impact on this sensitive rural landscape and would breach these development guidelines.	explained above significant adverse landscape effects are reported up to 1.5 km from the Project. As reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that '<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>' and paragraph 5.10.13, that '<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. For CNP infrastructure, '<i>the need case will outweigh the residual effects in all but the most exceptional cases</i>' (paragraph 4.1.7 of NPS EN-1 (2024)).
Historic Environment	The overhead route would cause unacceptable damage and harm to the setting of at least 4 listed buildings in Chignal St James and Chignal Smealey. Pylons TB152 and TB151 would damage the setting of three listed buildings, Chobbings Farmhouse Grade II*; Granary Chobbings Grade II; and Chopyns Barn Grade II. The setting of the neighbouring eight converted historic barns, comprising Kilnfield Barns would also be adversely affected by these pylons. Pylons TB155 and TB 154 would be highly visible from the Grade II* St James Church and The Green, public open space and from bridleway 33,	The Applicant has reviewed the assessment of Chobbing's Farmhouse, Barn at Chobbings Farm and Granary at Chobbings Farm, in light of the respondent's comments. The Applicant agrees that views of the proposed pylons are present from the surrounding area, as illustrated in Viewpoint HE39 (7.12 Visualisations - Part 9 of 9 [APP-351]), but disagrees that the setting of these assets extends to the Order Limits based solely on intervisibility. The Applicant is confident in its assessment, which considers the historical and functional relationship of the assets with the agricultural landscape, alongside the significant loss of this relationship due to 20th-century expansion, partial screening by development, and mature tree-lined hedgerows. Therefore, the Applicant is satisfied with the assessment undertaken within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and that the shared setting of these assets does not extend to the Order Limits. The Applicant has reviewed the assessment of Former Parish Church of St James, Chignal St James in light of the respondent's comments. The Applicant acknowledges that the Project would introduce pylons and wires into the setting of the church with the closest pylon located c. 390 m to the south-east. The church is located within a large graveyard defined by high evergreen hedges and containing mature cover. This creates a very secluded environment for the asset and very much limits its interaction with the local landscape. The Applicant is therefore satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of low adverse significance of effect, and in 6.11.A7 Environmental

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	damaging their unspoiled countryside setting.	Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], of lower less than substantial harm, are proportionate and appropriate. The Kilnfield Barns development is not identified as a historic environment asset by any of the agreed sources as listed in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas within Chignal Parish. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including Essex County Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.

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Biodiversity, ecology and nature conservation	Siting power lines near or crossing important areas or flyways used by birds may increase collision risk. There are also barrier effects as birds are deterred from using their normal routes to feeding or roosting grounds. Chignal is an important hunting and breeding ground for a wide range of raptors. Red Kites; Honey Buzzards; Marsh Harriers; Kestrels; Barn Owls; Tawny Owls and Little Owls are sighted regularly along the route of the proposed pylons, particularly around the restored landfill site which is now a Nature Park. Pylons TB156 and TB155 would cross over the Nature Park's circular footpath route, damaging the views over the surrounding countryside from this artificial hill. Construction works would cause serious disturbance to the hares and ground nesting birds, such as lapwings and skylarks which live and breed there.	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on wildlife / biodiversity / ecology. Bird survey results are reported in 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [AS-030] and 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170], with the overall evaluation presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The assessment draws on an extensive desk study comprising over 26,000 records from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, including red-listed and protected species. This includes raptors and owls such as red kite, honey buzzard, marsh harrier, kestrel, barn owl, tawny owl and little owl, as well as ground-nesting birds including Lapwing and Skylark. The desk study and field surveys did not identify Chignal as a notable raptor flyway or an area of elevated collision risk. Potential disturbance during construction will be temporary and is addressed through measures secured within 7.4 Outline Landscape and Ecological Management Plan (Revision D), including avoidance of the breeding season where practicable, pre-construction surveys for sensitive species (including Schedule 1 birds), protection of retained habitats during works, and reinstatement of temporarily affected habitats following construction, except where required for permanent infrastructure. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on views. National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This

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		identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Although the permissive circular footpath route within the Nature Park (restored landfill site) in this location is not specifically referred to in the assessments, effects on visual receptors using PROWs in this area are set out in Visual Receptor Area (VRA) F5 Chignall Smealy (paragraphs 13.9.51 to 13.9.62) and VRA F6 Chelmsford North-West (paragraphs 13.9.63 to 13.9.74) in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects in the location of the Nature Park are assessed as significant at construction and operation.
Transport and Traffic	HIGHWAY SAFETY DURING CONSTRUCTION The construction phase is expected to last at least 4 years, working from the north to south. Initially the work would involve the installation of haul roads up to 8m in width, parallel to the transmission line. The concrete and stone for the haul roads will need to be transported by HGVs which will have to cross both Chignall Road and Mashbury Road. Bellmouths will have to be created at these crossing points to improve visibility. This will entail the removal of hedgerows and trees and damage to grass verges. These hedgerows are important wildlife corridors, and the verges are subject to a half-cut to encourage wildflowers in	Crossover points are proposed on Chignall Road and Mashbury Road to allow construction vehicles to continue to travel along the off-line haul road. The roads are subject to a short-term temporary closure for the installation of the crossover points and other construction activities. The diversion routes proposed are detailed on Section F, Plan C and D of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-038]. Where a diversion is proposed, it will adopt the principle that they will use the same standard of road, or higher where practicable and available. Preliminary designs for the crossover bellmouth have been developed, and subject to the Road Safety Audit (RSA) process set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. The RSA process considers safety risks including turning conflicts and potential congestion at each of the proposed locations. For these two sites, the Applicant has engaged with Essex County Council as the Overseeing Authority in the development of these RSAs. 2.16 Trees and Hedgerows to be Removed and/or Managed - Section F [APP-053] provides details from assessments of affected trees and hedgerows which are to be removed, managed, are potentially affected or unaffected. 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in Outline CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is

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	line with Plantlife recommendations.	addressed by commitment GG33, with ecological constraints covered by commitment B02. Measures to protect land, soils and drainage systems are addressed in Outline CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in Outline CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through Outline CoCP Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).
Landscape and Visual	VISUAL IMPACT OF THE PYLONS Chignal parish has an extensive network of public rights of way, including a section of the Chelmsford Centenary Circle route, (Footpath 26) from which the proposed pylons TB152 and	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project raised by Chignal Parish Council. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km.

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	TB151 would be highly visible. These paths are used regularly for walking and horse riding by local people and increasingly by residents of Chelmsford seeking an escape from urban life in the unspoilt rural landscape of Chignal. The impact of overhead power lines would introduce an unwelcome urban element to the landscape and would negate the mental health and well-being benefits of taking a walk or riding in our easily accessible countryside.	Effects on visual receptors using the Centenary Circle are set out in paragraphs 13.12.173 to 13.12.189 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The effects on views in relation to people using the Centenary Circle and the Public Right of Way (PRoW) network within Chignal parish are also set out in Visual Receptor Area (VRA) F5 Chignall Smealy (paragraphs 13.9.51 to 13.9.62) and VRA F6 Chelmsford North-West (paragraphs 13.9.63 to 13.9.74) in the above document. Viewpoint assessment findings also identify significant and adverse visual effects including Viewpoint 6.05 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232] pdf page 64 and Viewpoint 6.20 on pdf page 107. Viewpoints 6.05 and 6.20 are approximately 0.91 km and 0.34 km away from the nearest above ground structure of the Project. Minor and not significant effects are identified for Viewpoint 6.24 which is further away at approximately 2.1 km. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement (NPS) EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. As reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that <i>'virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape'</i> and paragraph 5.10.13, that <i>'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'</i>. For CNP infrastructure, <i>'the need case will outweigh the residual effects in all but the most exceptional cases'</i> (paragraph 4.1.7 of NPS EN-1 (2024)). An assessment of the impacts of the Project on physical activity as a result of changes to PRoW and areas of open space during construction has been undertaken, with conclusions set out in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The chapter notes that physical activity is important for both physical and mental health and wellbeing, with recreational routes providing opportunities for relaxation, stress reduction, and mental restoration, all of which are relevant to overall wellbeing. Whilst a relatively small minority of the population would be affected in each

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		ward through which the Project route passes, alternative routes are generally available for use for the period over which effects are predicted to last. Whilst physical activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of PRoWs) are generally short-term, with rapid reversal / diversions in place and no significant effects on health and wellbeing have been identified.
Transport and Traffic	Nine footpaths, (FP) in Chignal parish, (representing 28% of the paths) would be adversely affected by the N2T pylons, such as FP 28 and the ancient woodland of Bushy Wood which would be dominated by the presence of TB147, TB148, TB149 and TB150. Pylons TB151, TB152, TB 153 and TB154 would be highly visible and an unwelcome distraction for walkers using FPs 21, 27 and 36. TB150 is situated very close to Chignal Road where the lines would cross the road to pylon TB151. This country lane is popular with cyclists and was used by the Tour de France and Ride London, attracting thousands of cyclists. The looming presence of these pylons will damage the	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on views from local lanes and the Public Right of Way (PRoW) network in Chignal Parish. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on views. EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. It is noted that footpaths 21, 27 and 36 are inter-connected and run from the south of proposed pylon TB153 to the north of TB156, passing under the span between TB154 and TB154. As a point of clarification the Applicant notes that pylons TB150 and TB151 are set well back from Chignal Road. It is assumed the comment is related to pylon TB152 which is adjacent to the road and connects to pylon TB153 to the west of the road. The visual effects on users of PRoWs and lanes within Chignal parish are set out under Visual Receptor Areas (VRAs) F5 and F6 in paragraphs 13.9.51 to 13.9.74 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors within 0.5 km are reported to be major and significant adverse, including people walking along footpaths 21, 27 and 36. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline PRoW Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs

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	countryside experience and feeling of escape which cyclists and walkers come to enjoy in Chignal.	would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRow are contained in 7.6 Outline PRow Management Plan [APP-329] and will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRow Officers at the relevant Local Highway Authorities during preparation of the final PRow Management Plan and will be supported by Road Safety Audits where required. The final PRow Management Plan will be submitted to, and approved by, the relevant planning authority. Where PRows interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented in line with 7.6 Outline PRow Management Plan [APP-329]. Advance signage and communication will be provided to ensure users are fully informed, and temporary PRow closures and diversions will be coordinated with other local works to avoid concurrent impacts. All PRows will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRow management arrangements are developed.
Land and property	EFFECTS OF THE PYLONS ON PARISHIONER'S ENJOYMENT OF THEIR PROPERTY The construction phase and eventual presence of 8 x 50m high pylons would affect several homes in the villages of Chignal Smealey and Chignal St James, impacting property values and	The Applicant is a responsible developer who has sought to engage with local communities such as Chignal Smealey and Chignal St James, to understand potential issues and concerns as they relate to the construction, operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors, such as residential properties, as far as reasonably practicable. While we understand that our proposals may cause concerns about visual impact and property value, UK law does not include compensation in cases of a loss of view or

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	reducing the enjoyment and mental health benefits that residents gain from being in their gardens with views across Chignal's tranquil and unspoilt countryside.	changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria. The impact of the Project on the mental health and wellbeing of local residents during the construction and operation (and maintenance) phases is assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This includes an assessment of mental health and wellbeing impacts associated with loss of visual amenity which draws on findings set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), which contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. A number of properties in the vicinity of Chignal St James meet the thresholds for inclusion in the RVAA. Table A13.4.3 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233] summarises the outcome of the assessment for these properties (of which there are nine in total). The magnitude of effect for all assessed properties in this location is low, low to medium or medium and as such the need for further assessment has not been triggered. The assessment notes where views from gardens would be screened or filtered by existing vegetation or buildings and that, whilst change would be discernible, it would have a small influence on the overall visual amenity from gardens. Overall, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties unattractive places to live. It is noted that some properties / property groups along the Project route do come close to this threshold and that mitigation measures have been recommended to reduce effects. Paragraph 10.7.130 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, but that the extent of the impact is not considered to be significant.

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		The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required).
Air quality and emissions	IMPACTS OF THE PYLONS ON THE DAILY LIFE OF CHIGNAL RESIDENTS. Householders are concerned about the noise and health effects of living close to transmission lines. The construction works would generate noise, dust and mud, destroy hedges and disrupt traffic using the rural roads and local utilities.	An Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution / dust / mud, noise pollution, effects on hedgerows, construction traffic and on utilities have been defined within each environmental topic chapter (where relevant) and in relevant environmental control documents submitted with the Development Consent Order (DCO) application, including 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. With regard to dust generation from construction, Section 7.2 of 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] discusses the results of the construction dust assessment. The assessment was undertaken in line with IAQM Construction Dust Assessment Guidance⁷. The assessment considers receptors up to 250 m from the Order Limits. 6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area [APP-154] shows a 250 m boundary around the Order Limits. The assessment concludes that with appropriate implementation of the mitigation measures specified in 7.2 Outline Code of Construction Practice (Revision C) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] there would be no

⁷ Institute of Air Quality Management (IAQM) (2024) *Guidance on the assessment of dust from demolition and construction*

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		likely significant effect to human health for householders from dust within 250 m of the Order Limits. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes the results of the hedgerow surveys undertaken over 2022-2025 and an assessment of impact as a result of the Project. This hedgerow impact assessment is based on a reasonable worst-case scenario of hedgerow loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of hedgerow loss would be reduced and impacts to hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in Chignal in relation to noise and vibration. Additionally, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).

Topic	Comment	National Grid's response
		The construction routing strategy is set out in 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes (PARs) to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. There are no roads within Chignal that have been identified as a PAR and therefore is not intended for use by construction HGVs. 6.16 F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020] Page 25 displays that there are no PARs proposed in the Chignal area. The closest PARs are proposed to the south on the A1060 (PAR 51) and to the north on Chelmsford Road (PAR 48). Therefore, significant effects as a result of construction are not expected in the rural roads in Chignal as there will not be an increase in the future baseline traffic volumes on these roads. Haul roads cross the public highway network at various locations. Crossover points will be used by construction traffic to cross the public highway. A crossover point is proposed on Chignal Road and Mashbury Road. No HGV construction traffic is proposed to use these crossover points to access the haul road from the public highway under typical operation, and vice versa. Construction traffic using the crossover points is expected to give way to vehicles on the public highway. These measures, identified within the 7.3 Outline Construction Traffic Management Plan (Revision B), will be provided to avoid delays at crossover points.

2.11 Coggeshall Parish Council

- 2.11.1 Table 2.11 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Coggeshall Parish Council [RR-0675]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.11 Comments and National Grid's response

Topic	Comment	National Grid's response
Alternatives	Coggeshall Parish Council responded to all non-statutory and statutory consultations on these proposals, and concurs with the consultation submissions from the similarly affected local Parish Councils, and that of the Essex Suffolk Norfolk Pylons Action Group. Their response to the first consultation was to ask that consideration is given to other forms of providing the infrastructure required, including routing the majority of the required line offshore, or undergrounding sections which cross more open and sensitive countryside, outside of the areas of SSSI or AONB.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Cumulative Effects	A route which avoids the major settlements of Coggeshall, Kelvedon and Witham and routed where it is less densely populated, needs to be	Coggeshall Parish is within Braintree District and is located within Section E of the Project. 7.20 2023 - Design Development Report [APP-358] considered routes to the north of Coggeshall, as shown in Figure 5.12 and discussed from paragraph 5.5.110, with the following conclusion drawn:

Topic	Comment	National Grid's response
	explored. The section crossing Coggeshall Hamlet will have a big impact on an area which is seeing housing growth, and the possibility of the new route for the A120 passing in almost the same area, along with the burdens of a minerals quarry and new waste incinerator blighting the countryside, all within a small area, putting strain on residents and business who are dealing with one big development pressure after another.	<i>'Routeing to the north of Coggeshall to reconnect with the consultation corridor to the east or west of Silver End, or east or west of White Notley has been considered. An alternative to the north would be less direct (between approximately 1.5 km – 5 km longer) would require an increased number of pylons (with the associated additional costs and environmental effects) and would involve more and sharper changes of direction than would be achievable within the consultation corridor (less compliant with Holford Rule 3). A northern route would also transfer effects to a greater number of potential receptors. This option has therefore not been taken forward and the consultation corridor remains preferred.'</i> This report also explained other local factors that influenced the routeing in this area from paragraph 6.4.113. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. The inter-project cumulative assessment presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination (as appropriate). The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] concludes that in Braintree, overall, negligible and not significant effects would be expected in relation to socio-economics, recreation and tourism, ecology and biodiversity, contaminated land, geology and hydrogeology, hydrology, flood risk and land drainage, health and wellbeing, historic environment, noise and vibration, and air quality. Moderate adverse and significant effects could not be ruled out in relation to construction effects for landscape and visual, and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.

Topic	Comment	National Grid's response
Historic Environment	There are many heritage assets and conservation areas along the proposed route, in and around Coggeshall, Kelvedon, Feering Parishes, which will be impacted by this proposal [...]	The Applicant acknowledges that the settings of some designated assets within Coggeshall, Kelvedon and Feering Parishes fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets within Coggeshall, Kelvedon and Feering Parishes. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.

Topic	Comment	National Grid's response
Biodiversity, ecology and nature conservation	[...] and environmental concerns such as where the preferred route would cross the River Blackwater.	As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of environmental surveys has been undertaken, including along the River Blackwater. This river survey data has informed the assessment of effects on biodiversity, hydromorphology, water quality and flood risk presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and 7.10 Water Framework Directive Assessment [APP-332]. The Project has engaged with Natural England, the Environment Agency and Braintree District Council on aspects relating to river ecology, water quality and flood risk, as detailed in Statements of Common Ground (5.9 Draft Statements of Common Ground [REP1-034, REP1-038, REP1-026]), and appropriate mitigation measures and techniques have been secured, as detailed in 7.2 Outline Code of Construction Practice (Revision C). Mitigation measures will be in place to safeguard the River Blackwater with respect to the crossing of the river for access and also to general construction works in proximity to the river. The temporary access crossing of the River Blackwater is proposed to be a single span bridge. Use of a bridge for this crossing reduces the risk of negative impacts on the river, compared to alternative crossing types, as it reduces the risk of channel bed/bank modifications which could disrupt flow regimes and have effects on hydromorphology (and subsequently on the habitats and protected species the river supports). During construction, measures will be in place to control sources of potential pollution and prevent the creation of impact pathways to the River Blackwater. The measures that will be in place are described in 7.2 Outline Code of Construction Practice (Revision C). The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects including for river ecology. The BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. As well as seeking to avoid and minimise our impacts on nature, the Project includes enhancement of watercourse habitats as part of BNG mitigation. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].

Topic	Comment	National Grid's response
		The Applicant therefore considers the environmental considerations where the proposed route would cross the River Blackwater have been appropriately assessed and mitigation measures proposed through engagement with the relevant statutory environmental bodies and local authorities, in this case Braintree District Council.
Landscape and Visual	Within the graduated swathe of the preferred route, siting the pylons as far from important views as possible is vital. Between Coggeshall Hamlet and Kelvedon, the network would be most visible from the B1024 and the houses in this area. A section along this road, south of White Barn, on the border with Feering Parish has fewer houses and the Parish Council would like this option to be considered, which has already been represented by other groups within the parishes. With the Council's objection to the need for this pylon route over alternative options, such as undergrounding or offshore already on record, we also wish to focus on the more local impact for both Coggeshall, and the neighbouring parishes of Feering and Kelvedon. This mainly encompasses the section from pylon numbered T69 to T83.	The Applicant notes the concern of Coggeshall Parish Council regarding the Project, specifically between pylon TB69 and TB83 which runs to the south-east of the Parish. The alternative route combines elements of previously considered corridors and routes. It transfers effects from one group of homes and listed buildings but moves the effects to other homes and listed buildings. The alternative is estimated to be around 500 m longer and likely to require additional pylons. On this basis the alternative is less preferred. Whilst not considered in the decision making the alternative would interact more with areas proposed for minerals and housing albeit neither within the relevant local plan. The Applicant notes that there are a number of protected views in and around Coggeshall as identified in the Coggeshall Neighbourhood Plan. Policy 15 of the Neighbourhood Plan states that '<i>Where development proposals have the potential to have a significant adverse impact upon one or more Protected Views they should be supported by a visual impact assessment.</i>' The Applicant confirms that a Landscape and Visual Impact Assessment (LVIA) was undertaken and is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on visual receptors within Coggeshall Parish Council are set out under Visual Receptor Area (VRA) E1 Coggeshall in paragraphs 13.8.1 to 13.8.12 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant effects are identified within approximately 1.5 km of the Project, reducing to not significant within the village of Coggeshall. Residents of Surrex and Coggeshall Hamlet and users of the B1024, within Coggeshall Parish, are considered within this assessment and are assessed as experiencing significant effects. Views from the edge of Coggeshall are represented by Viewpoint 5.14: Essex Way south of Coggeshall. The effect at this viewpoint was judged to be minor and not significant (adverse) as set out on pages 24 and 25 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232].

Topic	Comment	National Grid's response
	Specifically, the Coggeshall Neighbourhood Plan does not support development which will impact on identified Protected Views, which are outlined in Policy 15 of the Plan. Pylons TB73 to 80 will cross this view, having a negative impact. Specific impacts will be felt along the line of proposed pylons numbered T73 – T75, for properties in Surrex, where the pylons will be in close proximity. The negative visual intrusion of repeated large metallic structures, up to 50m high, will result in the loss of residential amenity for those most affected, and a general visual blight across valued and relatively undisturbed farmland.	Viewpoint 5.06: Cuthedge Lane, west of Coggeshall Hamlet is representative of Viewpoint 19 in the Coggeshall Neighbourhood Plan. The effect was judged to be minor and not significant (adverse) from this viewpoint as set out on pages 135 to 137 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties within 200 m of the Project centreline, to determine whether there are likely to be any breaches of the Residential Visual Amenity Threshold (RVAT), as described in Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment⁸. No residential properties within the Coggeshall Parish Boundary fall within this Study Area. Whilst it is recognised that properties beyond 200 m of the Project centreline may experience changes to visual amenity, the effects are not expected to be so great that they would breach the RVAT, and they have therefore not been included in this assessment.
Health and wellbeing	Residents are indeed concerned by risks to their health, and an almost certain impact on property values, estimated at between a 20-30% drop. One of the properties here has livestock – sheep and horses, who will be living under the cables. There are known	The Applicant does not currently have a discretionary purchase scheme available to the public. There is also currently no legislation in place that requires the Applicant to have a scheme in place. While we understand that our proposals may cause concerns about visual impact and about property value, UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria. Health considerations regarding Electric and Magnetic Fields (EMFs) are addressed in 7.8 Electric and Magnetic Field Compliance Report [APP-330]. No effects of EMFs on farming, flora and fauna are expected and Paragraph 2.9.58 of NPS EN-5 states: '<i>There</i>

⁸ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

Topic	Comment	National Grid's response
	negative health effects, both mental and physical, from the cable crackling on animals such as horses, whose environment will be permanently altered.	<i>is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.'</i> Although horses are not directly mentioned, there is no evidence to suggest they are any different to other farm animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project has been designed in accordance with the principles of the government's Code of Practice 'Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields'⁹ to ensure these are mitigated, which include equestrian facilities. The Applicant understands from feedback received during statutory and non-statutory consultation, that local communities may feel ongoing anxieties about the perceived effects of EMFs. Perceived impacts of pylons and power lines, while not linked to adverse health effects by scientific consensus, can nevertheless impact mental wellbeing and quality of life. This has been assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which notes that such effects are not likely to be experienced equally by communities along the Project route. Paragraph 10.7.145 of the chapter outlines a range of measures that are aimed at providing information on EMFs, helping to reduce anxiety around the subject prior to construction and operation (and maintenance) of the asset. Provision of support and information in this way will continue during the operation (and maintenance) phase of the Project. With the introduction of communication and public education measures relating to EMFs, no significant effects have been identified.
Biodiversity, ecology and nature conservation	Environmental concerns are paramount, with the disruption and devastation which will inevitably occur with the lines being installed, which will result in the loss of mature trees, vegetation and potentially entire habitats for the wildlife	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on wildlife / biodiversity / ecology. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for

⁹ Department of Energy and Climate Change (2013) *Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields*

Topic	Comment	National Grid's response
	who currently live along the route. This area has a population of swans who fly along the river, and the cables and pylons will cause problems with this flight path.	the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period. Collision risk has been assessed within 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. Vantage point surveys were carried out along the River Blackwater near Coggeshall over the migratory and wintering season of 2022/23, in line with best practice guidance NatureScot (2016)¹⁰. These surveys were designed to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. No swan species were recorded at collision risk height at the location of the proposed overhead line during this survey effort. Therefore, the assessment did not identify locations which pose notable collision concern to swans in this area. General mitigation recommendations with regard to birds are provided in 7.4 Outline Landscape and Ecological Management Plan (Revision D).
Land use	The loss of areas of agricultural land are also not insignificant at a time when the UK is in need of establishing its own food security. Loss of farmland is occurring already with housing developments and the building of roads. The further loss due to siting pylons will add to this tally.	The Applicant has taken into consideration the location of existing and proposed land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural

¹⁰ NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

Topic	Comment	National Grid's response
		Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Coggeshall Parish (Grade 3a). Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes Agricultural Land Classification grade, or as agreed with the landowner.
Historic Environment	The Council has also not seen any acknowledgement of concerns highlighted with regard to heritage assets from the first consultation. The proposed route crosses the A120 near Surrex, which follows – or is close to – the ancient Roman road of Stane Street. Coggeshall has almost 300 listed building and the remains of a Cistercian Abbey, all of which need to be avoided, and at the very least, a full Environmental Impact Assessment should be undertaken and published.	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. The vast majority of the listed buildings in Coggeshall flank Bridge Street, West Street, East Street, Stoneham Street, and Church Street and are located between 1.5 and 2 km away from the nearest pylon (TB76). These assets are largely residential properties with a few small commercial premises. The settings of the assets that flank the noted throughfares are focused on their roadside settlement locations and the interrelationships between the listed buildings and other non-designated buildings that add to the character of the settlement. Due to the settlement focus of these listed building and overall distance from the Order Limits they were scoped out for further assessment in accordance with the methodology set out in 6.19 Scoping Report [APP-288 to APP-296]. The setting of Coggeshall conservation area was assessed and its setting was judged not to extend to the Order Limits (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]). With regard to the scheduled monument Coggeshall Abbey and the associated listed building Coggeshall Abbey (Residence) Cartlodge/Shelter Shed 60 m south of Coggeshall Abbey, Barn, and Barn 45 m south of Coggeshall Abbey [Residence]; the assets were also fully assessed in the document noted above and no significant impacts identified.

Topic	Comment	National Grid's response
		The Roman road Stane Street follows the route of West Street/East Street/Chelmsford Road/A120 and it is likely that physical remains of the asset survive in this location. Furthermore, the Project oversails the route of the asset c. 1 km to the east of Coggeshall and so no below ground impacts will take place. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including Essex County Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Consultation	It is noted that a change has been made north-west of Fairstead in the Braintree Section E, with some undergrounding. This option may be a potential solution for the section encompassing pylons T73 – 75, to alleviate the direct impacts to those properties in Surrex, or it may not, however, it would assist the consultation to have this modelled and put to the community for discussion.	The use of a short section of underground cable, to the northwest of Fairstead, is for technical reasons to cross an existing 400 kV overhead line. More generally the Applicant is guided by policy set out in National Policy Statement (NPS) EN-5 (2024) regarding technology selection. NPS EN-5 sets out the relevant context for onshore schemes which starts from the government's strong starting presumption (paragraph 2.9.20) for the use of overhead lines which form the basis of the Project. The presumption is reversed (to use underground cable) within nationally designated landscapes and potentially within the setting of such areas though this is not relevant to the Surrex area, which is neither designated nor within the setting. Neither are landscape and visual effects widespread at a level that engages consideration in line with paragraph 2.9.23. The Applicant considers its proposals for an overhead line in this area to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Environmental Statement sets out the assessment of residual effects in the context that NPS EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure.
Alternatives	Fundamentally, the Council questions the need for this overground cable route, and would like to see alternatives being put forward for debate, such as an integrated offshore	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to

Topic	Comment	National Grid's response
	grid. These options should be put to the affected communities so that a fair comparison and conclusion can be made, having had all information available.	2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Alternatives	Much is made of the cost savings achievable with the overground route but this does not take into account the costs, from financial, health and other to those persons and businesses impacted along the entire route. Once they are taken into account, the Parish Council believes things would look entirely different.	In terms of the consideration of alternatives as part of the examination of the substantive case, National Policy Statement (NPS) EN-1 (2024) indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and, second, that only alternatives that can meet the objectives of the proposed development need to be considered. NPS EN-1 paragraph 4.3.22 explains that the Secretary of State will be guided by whether there is a realistic prospect of the suggested alternative delivering the same infrastructure capacity, the same energy security, the same climate change, and the same environmental benefits as the proposal in the same timescale as the proposed development. NPS EN-5 (2024) says that overhead line is the strong starting presumption for electricity network developments in general, having regard to that duty. That strong starting position is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the presumption and the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
Consultation	The consultations stated that, 'Knowing what matters to you matters to us. Your feedback is important to help us as we develop our proposals in more detail'. We have told National Grid	Firstly the Applicant acknowledges that the proposals introduce a change to landscape and visual amenity. However there is no minimum distance to be met in terms of property proximity and indeed National Policy Statement (NPS) EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The Essex 5 change established a position more equidistant between properties and responded to feedback.

Topic	Comment	National Grid's response
	what matters to us, and have given our feedback. Nothing, however, in their proposals has changed in the light of this. In addition, National Grid then came out to a more 'targeted' consultation for each area, for which the Parish Council responded to the Essex 5 area. A summary of that response is as below: This response refers to the revised proposal for location reference Essex 5. The revisions contained in this proposal indicate minor amendments to the proposed route, including: • Repositioned overhead line further to the east - approximately 150m further from properties of Surrex and 125m closer to properties of Sky Green • An increase in the quantum (sqm) of ground/vegetation clearance, haul-road and access route provision • An additional pylon (TB74 in the revised proposal), increasing the number of	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122].

Topic	Comment	National Grid's response
	pylons in the area from five to six Any attempt to reduce impact on properties, horse paddocks, and agricultural land is welcomed. However, we note that the proposed alterations do not take into account the significant concerns previously raised by CPC regarding the negative effects to local amenity; moreover, the alternative proposal sets up a false choice between two inappropriate routes. The proposed changes continue to significantly impact local residents due to the proximity to existing development. All properties within Sky Green, along Old Road, and the majority of those on Prentice Place will continue to fall within 400m of the proposed route.	
Transport and Traffic	The proposed development will result in significant loss of local amenity for residents, including: Construction disruption - we note National Grid's previous advice that works will not be on a rolling basis from Norwich to Tilbury, but across the whole	The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.

Topic	Comment	National Grid's response
	length of the proposal over the 4-year period. As such Surrex and Sky Green will be impacted by significant construction, nuisance and devastation during the whole 4-year construction period proposed	
Land use	Environmental impact - the proposed route will result in significant loss of biodiversity and increased risk of soil erosion and water contamination.	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits for the Project. The BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299]. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources (which includes minimising risk of erosion and loss of soil resources) during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. The potential for impacts on the water quality of surface water bodies has been addressed in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]. Mitigation measures will be implemented to reduce the risk of contamination and negative effects on surface water quality. These measures are documented within 7.2 Outline Code of Construction Practice (Revision C). The groundwater risk assessment included as 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184] provides an assessment of the potential for impacts related to the construction of the Project, on the groundwater and groundwater receptors identified within the Study Area.

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Air quality and emissions	The carbon footprint of construction, including steel and concrete production, further undermines the project's environmental credentials.	The fundamental purpose of the Project is to enable the connection of low carbon generation sources. 6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131] provides an assessment of the impact of both construction and operation (and maintenance) of the Project on greenhouse gases (GHG). In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The Greenhouse Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project, which includes the construction and operation (and maintenance) phases.
Biodiversity, ecology and nature conservation	The proposal will continue to devastate wildlife and habitat, including the local population of red-kite, roe deer, badger, and owls.	A full suite of ecological surveys has been undertaken across the Project over 2022–2025; the results of these surveys and an assessment of impact are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to important ecological receptors such as trees, hedgerows, badger and birds would be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to key ecological receptors where practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.
Noise and Vibration	Noise – the crackling produced by the overhead powerlines' corona discharge will affect day-to-day life of residents and visitors to the area. In addition, livestock are housed within	The proposed overhead line would use triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons), currently the quietest conductor system deployed by National Grid. This conductor type is already in operation on multiple 400 kV overhead lines and operational experience to date indicates that noise has not been a significant issue.

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	100m of the proposed route and have proven to be highly nervous of the noise produce by overhead pylons.	National Grid applies established policies and noise limits to manage overhead line noise, taking account of potential effects on nearby receptors and incorporating worst-case wet weather conditions, when noise levels can increase. Although scoped out of the Environmental Statement (ES) on the basis that significant effects from operational noise from overhead lines are not expected, information, including a noise assessment, is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261]. Assessment results indicate that noise from the proposed overhead line would remain well within these limits. Even directly beneath the overhead line under typical worst-case conditions, predicted noise levels would be below the lowest observed adverse effect level (LOAEL), and lower still in dry conditions. Consequently, no adverse noise effects are anticipated, including for noise-sensitive receptors that may fall within a World Health Organization-defined vulnerable subgroup, even at close proximity to the overhead line.
Land use	Agricultural and food production impact – the proposed alterations do not prevent the loss of areas of agricultural land caused by the route. Loss of farmland is already occurring in the immediate area due to housing developments, road building, and the potential large expansion of the nearby minerals quarry. This is a serious concern at a time when the UK is seeking to establish its own food security and lessen the environmental impact caused by food ‘air miles’.	Normal agricultural cropping can occur above underground cables, but it would not be possible to construct buildings and plant trees above them. Paragraph 4.8.70 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] refers to this aspect. In summary, we would expect normal agricultural cropping (grass, cereal, root and vegetables) to be resumed above underground cables. Uses involving support structures installed at depths presenting risk to the cables may also be able to continue by careful positioning of the structure/stake and it may also be possible to locally increase burial depth of cables. Replanting of hedgerows and establishment of scrub habitats would be acceptable, but it is not acceptable to replant trees nor establish buildings above the cable swathe. With regard to above ground infrastructure, there would be a permanent loss of areas of agricultural land required for permanent infrastructure. 6.6 Environmental Statement Chapter 6 – Agriculture and Soils [APP-138] details the total extent of land at each grade required for the permanent footprint of the foundations of the pylons, substations, Cable Sealing End compounds and any permanent access routes. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Coggeshall Parish (Grade 3a).

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		Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes Agricultural Land Classification grade, or as agreed with the landowner.
Socio-economics Recreation and Tourism	Economic impact – by materially adversely affecting the character, appearance and amenity of the surrounding area, the overhead pylons are at odds with the local economic strategy and tourism policy as set out in the statutory development plan (Policy LPP 8, Braintree District Council's Local Plan) and EN-1 Section 5.13. The proposed development will adversely affect the viability of local businesses such as the Houchins Wedding Venue and is already affecting the saleability of local residential properties with values along the proposed route already down c.30%	The Socio-economics, Recreation and Tourism Environmental Statement (ES) assessment has taken Braintree District Council Local Plan 2033 Policy LPP 8 and National Policy Statement EN-1 Section 5.13 into account. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] assessed the potential impacts and effects on the local economy, local employment, tourism economy, businesses and visitor bedspace. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Coggeshall Parish Council in the ES assessment, including Houchins Wedding Venue. The Applicant does not currently have a discretionary purchase scheme available to the public. There is also currently no legislation in place that requires the Applicant to have a scheme in place. While we understand that our proposals may cause concerns about visual impact and about property value, UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
Health and Wellbeing	Health and well-being – residents continue to be concerned about potential	An assessment of the physical and mental wellbeing impacts arising from the construction phase of the Project is contained in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]. This includes assessments relating to

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	impact on their physical health stemming from increased traffic, dust, odour, noise, exposure to radiation and increases in pests; the prospect of the significant harms detailed above are already causing significant stress and anxiety	air quality, noise and community safety (including traffic impacts). No significant effects have been identified, with the assessment highlighting construction phase mitigation included in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The Applicant recognises that residents may feel stress and anxiety in relation to environmental impacts arising during the construction phase of the Project, including impacts from traffic, dust and noise. An assessment of potential effects on mental health and wellbeing of residents during the construction phase is also provided in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]. The assessment references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. 7.3 Outline Construction Traffic Management Plan (Revision B) details the Applicant's proposals for reducing disruption from construction activities to existing users on the public highway network and properties adjacent to it. The construction routeing strategy is set out in Section 5.4, which details how construction traffic will use the Strategic and Major Road Networks to access the region. From the Strategic and Major Road Networks, construction traffic will be routed along prescribed Primary Access Routes to the site access points. There are no Primary Access Routes identified within the village of Coggeshall. The Applicant is proposing a number of crossover points within Coggeshall, to allow construction vehicles to continue travelling on the haul road. Construction traffic is not permitted to join/leave the public highway in these locations, unless stated in the 7.3 Outline Construction Traffic Management Plan (Revision B). These scenarios can include emergency access or contingency routes. 7.2 Outline Code of Construction Practice (Revision C) contains housekeeping measures for preventing pests and vermin control (GG18).
Alternatives	The position of CPC regarding the impacts of the proposed development across the whole Parish remains unchanged.	The Applicant acknowledges the position of Coggeshall Parish Council but also notes that the rationale for not progressing an offshore solution has been reported in material published in support of consultations held in 2022, 2023 and 2024. This has included in the 7.18 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-356],

Topic	Comment	National Grid's response
	The Council is also concerned that the National Grid undertook an expedited consultation programme, without providing sufficient evidence that a predominantly onshore solution is required. Throughout the consultation process, no meaningful alternatives have been presented for consideration, despite the feasibility of options such as a fully-integrated offshore grid, underground or subsea transmission, or a platform solution for the Five Estuaries and North Falls projects. The failure to adequately explore alternatives contradicts the principles of thorough and fair infrastructure planning. The Parish Council asks the Inspectorate to fully explore the alternatives to these huge pylons being forced on residents and areas who are already under immense developmental pressure from housebuilding, roadbuilding, quarries and incinerators. They also remain of the opinion that other options, such as offshore, should be independently	three Design Development Reports [APP-358 – APP-360] and three Strategic Options Backcheck and Review (SOBR) [APP-355 – APP-357] reports. A response to the detailed points raised in the RR is provided above. The request to the ExA on matters for examination is acknowledged.

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	verified as not being viable, rather than National Grid telling us themselves, through what must be a biased viewpoint. Therefore, Coggeshall Parish Council remains in objection to the route being proposed through theirs and surrounding parishes as presented and asks that this is not approved.	

2.12 Cotton Parish Council

2.12.1 Table 2.12 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Cotton Parish Council [RR-0700]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.12 Comments and National Grid's response

Topic	Comment	National Grid's response
Landscape and Visual	Cotton is a small rural village in Mid-Suffolk with a population of just over 500. It is set among valuable arable land, with a Grade 1 listed Church, plus many other listed, mostly medieval properties, and two significant historic houses (past both of which the 50m pylons will run close). More modern development is of a ribbon or standalone kind. There are 15 of the 50m plus high pylons planned within the Parish, running north-south down the eastern side, the cumulative effect of which will be devastating while they are being constructed and for decades to come once built .	The Applicant notes the concern of Cotton Parish Council regarding the Project. The Applicant assumes the reference to cumulative effects is related to the impacts of multiple pylons within the Project, and not cumulative effects as assessed in accordance with Planning Inspectorate guidance. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Cotton Parish Council are set out under Visual Receptor Area (VRA) B4 Finningham and Gislingham in paragraphs 13.5.37 to 13.5.48 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Cotton Parish Council are set out in paragraphs 13.3.242 to 13.3.256 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under the Plateau Claylands Landscape Character Type (LCT). The following viewpoints represent views from Cotton Parish: Viewpoint 2.09: PRoW Dandy Corner (Cotton 18) where effects are judged to be moderate and significant (adverse) – see pdf page 512 to 514 in 6.13.A3

Topic	Comment	National Grid's response
		Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Viewpoint 2.11: Middy Railway Footpath near Stonham Road where effects are judged to be major and significant – see pdf pages 518 to 520 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].
Good Design	Cotton is situated on high plateau clay-land, with extensive open views, rich in wildlife, dotted with well-used footpaths. It's history is rooted in farming and it attracts residents who seek a quiet countryside life and pursuits. No mitigation is possible given the topography of the land in question and it seems to the Council that both the Holford Rules and Schedule 9 of the Electricity Act 1989 have been disregarded in the National Grid's proposals.	The Applicant disagrees that the Holford Rules and our duties under Schedule 9 of the Electricity Act 1989 have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Whilst in accordance with the Electricity Act 1989, the Applicant is required to develop and maintain an efficient, coordinated and economical system of electricity transmission, we also under Schedule 9 must '<i>have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest...</i>'. So, whilst cost is a consideration so are other factors. The submitted alignment has been reached following careful consideration and balancing of environmental and socio-economic constraints and opportunities, engineering feasibility, planning policy and cost.
Draft DCO	The Parish Council understands the nature of this stage of the Norwich to Tilbury project and the fact that the	Noted.

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	Planning Inspectorate (P.I.) has accepted the National Grid's Development Consent Order (DCO) application for examination. The Council will therefore aim to focus its comments on aspects relevant to the P.I. However, we would not be serving the interests of Cotton residents if we fail to state some major concerns about the way the National Grid (NG) has approached this significant Nationally Significant Infrastructure Project (NSIP). And how it bodes ill for the future implementation of the scheme.	
Consultation	The Council and a large number of its residents have consistently engaged in writing and in person with the NG from the outset. We support the need for renewable energy but at no stage, along with many thousands of others, have we felt we have been seriously listened to by the NG. Alternative, viable proposals which are less damaging in the long-term to the countryside, environment, nature, farming etc., were not consulted on. Despite constant requests,	The Applicant disagrees with the views expressed as we have presented information about other alternatives and the reasons for our preference. We understand others may prefer different alternatives but it would be disingenuous to present these when we know that they would not receive regulatory approval. We have developed the Project in response to our duties and regulatory environment and listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed

Topic	Comment	National Grid's response
	proper comparative cost/benefit analyses of the construction and maintenance of HVDC and Off-Shore cabling versus the pylons have never been presented. We all believe, despite the elaborate machinery of NG consultations, that we have been presented with a fait accompli and basically told this is what you're getting.	how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122]. 7.17 Strategic Options Backcheck and Review [APP-355] Section 3 'Need Case' page 20-38 sets out the need for the Project. The Project requires a circuit greater than 6 GW to meet the need. This is one of the highest capacity of circuits.. The higher the power, the larger the circuits need to be. The Applicant uses the same methodology nationally to assess strategic options, applying the same set of cost considerations as explained in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], Appendix D: Economic Appraisal. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology, including maintenance costs for each technology. Appendix C: Technology Overview of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] provides detail of each technology. The cost differential between the proposed Project and all high voltage direct current (HVDC) alternatives is stark, and is set out from the transparent economic appraisal in 7.19 2023 - Strategic Options Backcheck and Review [APP-357]. The costs were set out at Issue Specific Hearing 1 with all data from [APP-357] and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D: Economic Appraisal. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] page 111 states: <i>'Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'</i>

Topic	Comment	National Grid's response
		Therefore, the evaluation considered alternative technologies and offshore alternatives. The evaluation was based upon the same methodology used nationally. It took into account maintenance costs of each alternative along with the capacity required to meet need.
Alternatives	Why are we being fobbed off with technology that may have suited the mid/late 20th century, when many of our European and Scandinavian neighbours have shown far greater enlightenment and care for their environment in delivering renewable energy via HVDC (underground network solution) or off-shore cabling and energy hubs.	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Needs Case	Why is so much of the East Anglian countryside being sacrificed with a route that brings energy in from the North Sea on a route starting in Norwich, and running 180km when the vast majority of it is	The integrated nature of the transmission system means that the Project would benefit the UK as a whole, including the East of England. The connection points represent the most appropriate means to respond to the Project need case rather than being indicative of actual demand. The Project introduces transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new

Topic	Comment	National Grid's response
	headed to London and the South-East	sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands.
Needs case	How is it that a private company – there to make a profit - plans to bring renewable energy 4000km under the sea from Morocco into the UK? But an off-shore solution is dismissed out of hand.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Project has reviewed whether the use of HVDC cables (on or offshore) is appropriate but, as set out in the 5.15 Design Development Report [APP-122] drawing from the SOBR, such an approach cannot be justified given our duties and the planning policy. The Applicant does utilise HVDC where it is justified by the specific project circumstances and need case.
Alternatives	Why has the NG come up with undergrounding and off-shore solutions in other parts of the UK but is only prepared to underground a minor proportion of the Norwich to Tilbury route (i.e., Dedham Vale)?	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and

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		5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
Historic Environment	Valued and historic buildings and property in Cotton referred to earlier, will have their settings and views blighted by the sheer size and number of pylons in this small village. The impact is exemplified by Hempnalls Hall, a Grade II listed house and bridge over its moat, whose long-time owners – or current custodians as they see it – are battling hard to protect its historic setting. They have supplied detail to the Grid and the P.I. of its important history, as among other things, the former home of Anne of Cleves	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets, including those located in Cotton. The Project will not result in any substantial harm to designated heritage assets. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's impact on the Grade II listed Hempnalls Hall (1180451). The assessment has considered how change in the setting of the asset would affect its value, in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], which aligns with relevant heritage guidance. The assessment, presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], concluded a minor adverse significance of effect during construction and a negligible adverse significance of effect during operation (and maintenance). The impact is also assessed in terms of harm and this concluded lower less than substantial harm during construction and operation (and maintenance) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting.

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		However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Transport and Traffic	Additionally, though, it is an asset to the village by virtue of the two very popular footpaths running through its grounds. These will be permanently impacted by 3 pylons and closed during the construction phase, with much wildlife disturbed in the process.	The Applicant notes the concern regarding Public Rights of Way (PRoWs) in the vicinity of Hempnalls Hall. As set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], all affected PRoWs will remain accessible throughout construction either through managed access on their existing alignment or through appropriate temporary diversions. No PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the two PRoWs running through the grounds of Hempnalls Hall, the Applicant would note that they are not directly impacted by the Project. However, two PRoWs to the east of Hempnalls Hall (W-563/046/0 and W-203/028/0) are affected and the Applicant confirms that both routes will remain open on their existing alignments under a managed access regime, with any required safety measures implemented, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan. All PRoWs temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction surveys. The assessment of ecological impacts from the construction of pylons and other construction elements, including potential disturbance impacts on a range of ecological receptors, has been captured within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Mitigation measures have been secured through 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of

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		Construction Practice (Revision C) to ensure there are no significant residual effects on any ecological receptors.
Land and Property	One of the many unfairnesses of this whole project is that the value of a property such as Hempnalls Hall can be dramatically reduced (30-50%), but because the pylons causing that are not their land there is NO compensation.	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
Historic Environment	The PC wishes to know why Hempnalls Hall and Cotton Lodge, an equally historic house in the village have not been given sufficient weight in terms of being important Heritage Assets;	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. All heritage assets were assessed to determine their value in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], as agreed through consultation with historic environment advisors to Local Planning Authorities and Historic England. Hempnalls Hall (1180451) and Cotton Lodge (1285476) are both grade II listed buildings and have been assessed as medium value. As set out above, the assessment presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] for Hempnalls Hall (1180451), concluded a minor adverse significance of effect during construction and a negligible adverse significance of effect during operation (and maintenance). The impact is also assessed in terms of harm and this concluded lower less than substantial harm during construction and operation (and maintenance) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). Regarding Cotton Lodge (1285476), 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] considers the setting of the asset and concluded that <i>'due to the Project being located in the neighbouring parish, the intervening landscape in that parish being occupied by the buildings and infrastructure of</i>

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		<i>Wick's and Cotton Farms, and screening afforded by the asset's heavily wooded grounds, the setting does not extend to the Order Limits'.</i> The Applicant considers that these heritage assets have been appropriately assessed.
Alternatives	we urge the P.I. to challenge the NG as to why not only pylons RG128,129 and 130 can't be moved further east, but much of the run of pylons north – south down to Lamberts Lane. (See sections below on agriculture and The Wimble)	The potential to divert the alignment to more closely parallel the existing overhead line infrastructure, particularly in this location where the existing and proposed lines come into close proximity, has been considered and reported in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356], 7.20 2023 - Design Development Report for the Project [APP-358] and 7.21 2024 - Design Development Report for the Project [APP-359]. It has been further reviewed in respect of the section identified in the feedback in 5.15 Design Development Report [APP-122]. In the absence of new information or the identification of other factors, the conclusions drawn previously remain valid that it is less preferred. There are greater effects where lines converge and diverge with sharp direction changes to the north-west of Mendlesham and southeast of Mendlesham Green to connect with the remainder of the alignment. Other identified effects in the feedback are not removed but transferred to other receptors, and overall adopting the change would provide an alignment with more angle pylons and be less direct and less consistent with Holford Rule 3. The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents. Individual responses are set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360).
Historic Environment	The Wimble, Stonham Road IP14 4RU This medieval property lies isolated at the southern edge of the village, amidst the high Suffolk uplands, open farmland and with an abundance of	On the basis of the location information provided in this comment the Applicant understands that this building is not designated and has been identified and assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] on the basis of historic map evidence as non-designated assets 2797 and 2798. The building was not identified as a heritage asset in any of the other sources used to inform the historic environment baseline as set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The non-designated building

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	largely undisturbed wildlife. It is probably the single most impacted and endangered property on the pylon line through Cotton. The pylons, at 10 times higher than the old house, come very close, RG138 being around 100m away. In effect the wires then pass almost over the property to an angle pylon RG139, and encircle the property on three sides. Their position means that pylons in double figures will cut across their visible countryside and around their property.	is located outside the Order Limits, approximately 150 m from pylon RG138 and would not be oversailed by the conductors. The alignment would pass to the west of the asset, although in proximity. The non-designated building was assessed as low value in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment: '<i>The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES</i>'. In several places NPS EN-1 refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that the Project has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.
Biodiversity, ecology and nature conservation	The owners are responding in detail to the P.I., as they have consistently to the NG. While there has been some minor re-alignment by the Grid, the core issues remain the same. The wildlife in this part of the village is at its richest and most diverse, including rare species. The owner has no confidence that the NG has carried out a meaningful assessment of the habitats and bio-diversity, given	The area around Cotton has been subject to a full range of ecological surveys over 2022–2025 by competent professional ecologists. These surveys have included habitats, bats, water vole, otter, reptiles, badgers, invertebrate and birds, and the results and assessment of impacts on ecological receptors are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the associated ecological appendices. Impacts on trees and hedgerows, amongst other ecological features, will be refined further at detailed design stage. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain (BNG) with environmental and societal benefits.

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	the perfunctory visit by NG hired ecologists.	
Historic Environment	This historic property has no foundations but has stood undisturbed for hundreds of years. The owners have had to be vigilant in its maintenance and are now fearful of the pylons' impact on the fabric of their house, especially the volume of construction which will take place all around it and the permanent damage it will cause to their access and the single lane road servicing it, to vegetation and wildlife . They have family health issues which they will relay to you.	Please see response above regarding the historic environment assessment for this building. The Project has also assessed the impact to sensitive receptors from noise and vibration during the construction phase – see 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The construction vibration assessment includes consideration of the effects on people (disturbance) and potential damage to buildings and structures. The assessment has identified a small number of locations where there is a risk of damage from close proximity to compaction activities associated with highways works, but no locations have been identified where there is a risk of damage due to pylon construction works. Additionally, further detailed construction vibration assessments will be undertaken by the contractor, as per commitment NV05 of 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post-condition surveys to be conducted in situations where there is a potential for building and structural damage, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Planning Policy	The Parish Council urges that the P.I. focuses on this section of the route, examines how the Grid's plans can possibly accord with the Holford rules and Schedule 9 of the Electricity Act 1989 in terms of preserving valued landscapes	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would

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	and protecting the natural environment.	note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
Alternatives	As mentioned earlier why can the line not be run further east, avoiding the existing gas pipeline, by crossing Hoggets Road before resuming the route further south?	This suggested preference is considered to be similar to that considered at paragraph 5.3.5 in 5.15 Design Development Report [APP-122] . The change would transfer effects and presents various technical risks and increase effects to some respondents. The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents. Individual responses are set out at the paragraph noted above and more generally in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360).
Land and Property	If there is no movement in relation to this, what rights do The Wimble owners have if their fears of permanent structural damage to their property comes to pass?	Compensation applies where land or rights are acquired under a Development Consent Order (DCO) and the retained property suffers a direct reduction in value because of the Project; this is called injurious affection. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code.
Land use	We have stressed in all our dealings with the NG, the devastating effect of the pylons and their construction on the small farms in our village. The short and longer-term effects on the land, it's productivity and profitability/viability are most worrying. The farmers report the great difficulty in extracting	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on

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	information from the NG and their agents.	farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Cotton Parish (predominantly Grade 3a land). Soil management measures to be implemented during construction across the Project, including across Cotton Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Biodiversity, ecology and nature conservation	It's important to stress that farmers such as ours share the concerns about the wider environmental impacts of this project. They have planted many trees and hedgerows and sought to manage their land in ways that has attracted new breeding wildlife. Much of this effort will be destroyed.	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on wildlife around Cotton. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2023–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures and mitigation to avoid or reduce impacts on valuable habitats and species and mitigation measures as appropriate. The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently

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		voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299]
Biodiversity, ecology and nature conservation	One of our village farming businesses, whose home will be very close to and in direct line of sight of pylons, estimates that 40 of his 130 acres could be lost for three years. He is at the top of Willow Farm Road. The affected land, once the haul roads to the two pylons (RG128 and 129) are removed, would be anaerobic and take years to recover. The compensation per pylon at £8k single payment is regarded as derisory. He has asked how long the haul roads on his land will be in place and what compensation he will get. He knows it will be out of action well beyond the removal and has asked if the time and cost of restoring the land from its compaction, including repair of any collapsed drains will be met. He has not received any satisfactory answers	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. In addition to the per pylon easement payment, the Applicant in line with the compensation code will compensate landowners and occupiers for reasonable, evidenced losses directly caused by the Project, such as temporary loss of use, crop loss, disturbance, and, where applicable, injurious affection or severance. These are assessed individually after construction and reinstatement and are not decided in the Examination.
Biodiversity, ecology and nature conservation	Another farming family at Church Farm and Boundary Farm, will have eight pylons on the land that they farm (RG 132 -139). The proposed pylons	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including

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	currently run through the middle of the fields, rendering continued farming over an extended period difficult if not impossible. Like everyone else, they have pushed for the pylon route to be moved further East and more closely paralleled with the older, smaller pylons. The level of anxiety, given the threat to the viability of the business was already high, but has risen exponentially with the disclosure of the nature and scale of the construction phase. 30% or more of the land could be out of action for several years, and the long-term damage to the soil extensive. Drainage measures are essential and expensive on this type of clay-land and remedial work would be necessary on much of the land.	farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Cotton Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. Drainage measures are described in the Drainage Strategy that has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The Drainage Strategy addresses how soil and ground conditions have been considered and provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled. With respect to remedial work, as per commitment W14 in 7.2 Outline Code of Construction Practice (Revision C), replacement drainage schemes will be installed where appropriate once the Project has been constructed.
Property and Compensation	The sums being offered for this scale of disruption are derisory. They have tried to engage with the plans as presented in the Statutory Consultation, suggesting that certain paths at the edges of fields could be	The Applicant has confirmed in 5.1 Consultation Report [APP-066] (Ref 9-2.950) where more information can be obtained on landowner compensation. Information on how landowners are compensated can be found in the Applicant's land rights strategy¹¹ (LRS), and a copy can be found on the Project website. A copy of the document has also been sent to affected landowners on several occasions, along with an invitation to discuss it with the Project's lands team. The LRS document, and the

¹¹ National Grid (n.d.) *Land Rights Strategy and Payment Schedule for Assets*

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	used to absorb some of the width of the haul roads and for siting the pylons to minimise the percentage of the fields put out of action for several years. No movement has been forthcoming. They also regard the compensation for each pylon as totally inadequate and have no idea if there will be further payment for any permanent damage to the land.	compensation payments within, were reviewed and updated in 2024. If a landowner would like to discuss compensation matters and how the payments in the LRS would apply to them, they can contact the Project's lands team.
Biodiversity, ecology and nature conservation	A third, the smallest family farm in Cotton of 100 acres will have two pylons (R129 & 130) which will split their farm and give very limited access to the far side of the pylons during the three years of construction and massive disruption. A. Cotton PC urges the P.I. to pay particular attention to decisions over the siting of the pylons and the building and access to the haul roads from the perspective of smaller farmers trying to remain viable.	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. The Applicant makes a standard easement payment per tower (and associated oversail where applicable) in accordance with its Land Rights Strategy. Any compensation for loss or damage, including crop loss, disturbance, injurious affection or qualifying business losses, is assessed separately under the statutory Compensation Code and is not included within the standard easement payment. A copy of the Applicants Land Rights Strategy and associated payments has been issued to all affected parties on several occasions through the development of the Project, including the issue of HoTs. On each of these occasions the Applicant has emphasised that if an affected party has any concerns or questions over compensation they would be happy to discuss.

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Land and Property	Will the P.I. get the NG to clarify their policy and plans on compensation for farmers? How can farmers forward plan their businesses and investment against a background of such uncertainty and opaqueness?	The Applicant has confirmed in 5.1 Consultation Report [APP-066] (Ref 9-2.950) where more information can be obtained on landowner compensation. Information on how landowners are compensated can be found in the Applicant's land rights strategy¹² (LRS), and a copy can be found on the Project website. A copy of the document has also been sent to affected landowners on several occasions, along with an invitation to discuss it with the Project's lands team. The LRS document, and the compensation payments within, were reviewed and updated in 2024.
Socio-economics, Recreation and Tourism	The peaceful rural character of Cotton is what residents most value as well as the ability to walk, cycle, ride safely down its lanes and along its footpaths.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. The Applicant has sought to reduce potential effects on communities and residents through routing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact recreational routes and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Cotton Parish Council in the assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. No significant effects relating to health and wellbeing have been identified. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary.

¹² National Grid (n.d.) *Land Rights Strategy and Payment Schedule for Assets*

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		The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance¹³. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Transport and Traffic	There is widespread concern and anger about the scale of construction traffic and machinery to erect 15 pylons in a small village, where many of the roads were built for horse and cart, or cars and tractors not 20ton Lorries loaded with aggregate/stone.	As detailed in the construction routing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing construction traffic to be routed via Primary Access Routes (PARs) from the Strategic and Major Road Networks to the site access points. The PARs near Cotton are routed via Finningham, from the A143 along the B1113 on Wickham Road (PAR 12 and PAR 13). These PARs are shown on page 10 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. Where the Applicant is proposing a PAR, an assessment has been undertaken to understand the potential mitigations required for safe two-way Heavy Goods Vehicle (HGV) movements. The mitigation measures proposed for Wickham Road are detailed in Sheet 5 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section B [APP-314] and include vegetation clearance and small locations of carriageway widening. An assessment of significant effects was undertaken for PAR 12 and PAR 13 on driver / public transport passenger delay, pedestrian, cyclists and horse-rider severance, amenity

¹³ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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		and fear and intimidation as detailed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment was undertaken for the daily (07:00-19:00) worst-case peak construction period on both PARs as presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that there would be no significant effects when taking account of the proposed mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). For the B1113 Finningham Road / B1113 Walsham Road (PAR 12) this mitigation includes providing information within the driver information pack of locations where pedestrians cross the carriageway or could be walking on carriageway, cutting back vegetation and maintenance of verges, improve existing advanced warning signage, notices on Public Right of Way access and surface colouring under 'SLOW' markings. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] details that PAR 12 and PAR 13 have a proposed temporary vehicle net increase of 26 HGV movements in both the AM and PM peak hours. This equates to a percentage increase of 9% and 12% respectively in the AM peak hour, and 9% and 13% respectively in the PM peak hour. This peak worst-case construction activity would be over a duration of two-weeks.
Transport and Traffic	Concerns include damage to roads, more potholes, noise and vibration, road safety with very few pavements in the village and many cyclists dog walkers and horse riders. Given the nature of the rural road network, any closure of the B/C roads and connecting lanes leads to long detours affecting access to schools, convenience stores, doctors etc all of which are based in villages adjacent to Cotton and hampers emergency services.	There are a number of proposed short term temporary road closures in Cotton. Diversion routes are proposed on Cotton Road/Mendlesham Road for the installation of a crossover bellmouth and other construction activities. The temporary diversion routes are shown on Section B, Plans E and F in Access, Rights of Way and Public Rights of Navigation Plans [APP-034]. Where a diversion is proposed, it will adopt the principle of using the same standard of road, or higher where practicable and available. Section 5.8 of 7.3 Outline Construction Traffic Management Plan (Revision B) includes a commitment that where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. It is anticipated that the Traffic Management will be managed through the Permit Schemes hosted by the relevant Local Highway Authority, to reduce disruption where possible. The Applicant is proposing to undertake pre- and post-condition surveys on the Abnormal Indivisible Load (AIL) and Heavy Goods Vehicle (HGV) routes. In accordance with commitment GG06 in 7.2 Outline Code of Construction Practice (Revision C), a

Topic	Comment	National Grid's response
		record of condition will be carried out of the working areas that may be affected by construction activities. The record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the pre-condition survey. Construction drivers will be issued with a driver information pack, which will include location details for areas where pedestrians, cyclists and equestrians are expected to be on the public highway. Information is detailed in 7.3 Outline Construction Traffic Management Plan (Revision B).
Safety and Security	We have little idea how long the active construction phase will span. It is essential that such works are kept to a minimum in terms of disruption and safety.	Details relating to the proposed construction programme, working hours and any associated restrictions are outlined in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The Main Works Contractor(s) would have to adhere to mitigation measures within control documents secured by Requirement 4 in the Draft Development Consent Order [REP2-004] which would limit disruption during construction, including in Cotton Parish. This includes 7.2 Outline Code of Construction Practice (Revision C) which requires the Main Works Contractor to have an agreed construction phase Safety Health and Environment (SHE) Plan agreed by National Grid before works start. The SHE Plan must include details regarding '<i>the protection of the public in the vicinity of the construction site</i>' and defined emergency procedures. The following commitments within the Outline CoCP also relate to security: • GG29 – ensures working areas appropriately fenced; fencing type considers level of security required; fencing inspected/maintained • GG16 – required contact details and emergency numbers to be displayed at compound entrances • GG30 – requires a community liaison and public contact number and for any complaints to be logged and tracked. Additionally, under the Construction (Design and Management) Regulations 2015, the Main Works Contractor is required to ensure construction areas are suitably and sufficiently segregated and that the site is left safe and secure at the end of each working day.
Land use	For the farmers, the construction phase is especially	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part

Topic	Comment	National Grid's response
	brutal. The extent of the haul roads and their impact on the fields during the build and long after the pylons are up, is a major worry. The width of land required for them, including the displaced topsoil, could be 21m – the width of a motorway.	of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Cotton Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Air quality and emissions	The Grid's project was originally called East Anglia Green (no joke intended) but many pointed out that the need to shift tens of thousands of tons of aggregate/stone for the haul roads from distant quarries was the most environmentally unfriendly action, leaving a massive carbon footprint. And this is before transporting the pylon steel, the wires, scaffolding etc to all the sites. In the 21st Century, are there really no viable alternative	The fundamental purpose of the Project is to enable the connection of low carbon generation sources. 6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131] provides an assessment of the impact of both construction and operation of the Project on greenhouse gases (GHG). In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The Greenhouse Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project. The DCO application applies a reasonable worst-case assumption for haul road construction requirements, and applies established industry methodology and materials, including the use of stone aggregate. Options to reduce the volumes of stone, including soil stabilisation, or to provide alternative haul road construction, such as track matting, may be identified in some instances by the Main works Contractor(s) as part of detailed design. The Main Works Contractor(s) would seek to identify opportunities to reduce

Topic	Comment	National Grid's response
	methods to haul road of this kind?	material volumes required where site specific conditions are suitable and practicable to do so and they do not result in materially new or different effects to those assessed in the Environmental Statement.

2.13 Councillor Sara Naylor

- 2.13.1 Table 2.13 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Councillor Sara Naylor **[RR-0702]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.13 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	I am the elected Colchester City Councillor for Lexden and Braiswick ward, which includes the villages of Aldham, Eight Ash Green, Fordham Heath, West Bergholt. I have consulted extensively with residents and captured their feedback and my own observations in a 9pp submission entitled 'Cllr Sara Naylor, Lexden & Braiswick Ward, Colchester City Council: Norwich to Tilbury Statutory Consultation response 25 July 2025' to the last public consultation by National Grid in July 2024. The content of the submission is relevant to this process. I wish the document to be considered along with this text which briefly touches on the main issues. I will email the text from the email that I	The Applicant has carefully considered all feedback received at pre-application consultation exercises and reports on this in the 5.1 Consultation Report [APP-066] .

Topic	Comment	National Grid's response
	register with, please ensure it is included	
Alternatives	I remain opposed to this scheme which fails to consider reasonable alternatives to an inland pylon route from Norwich to Tilbury.	The opposition to the Project is noted. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and Visual	My ward includes the Colne Valley which is contiguous with the Dedham Vale and the Roman River valley. These are ancient landscapes that are untouched in over 1000 years. Colne Valley should have a Valued Landscape Assessment as National Grid has not done this. There is much about the valley that merits this.	The Applicant notes the concern of Councillor Sara Naylor about the landscape value of the Colne Valley. Judgements on landscape value were made as part of the assessment and are detailed in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. These value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations¹⁴. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3). The landscape value of Landscape Character Area (LCA) A5 Colne River Valley Slopes and LCA A4 Colne River Valley Floor is judged to be medium-high. The basis for these judgements is contained within Tables A29 and A30 on pages 311 and 312 in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228].
Socio-economics,	Aldham is a village that will be worst affected in the Colchester City Council area with pylons bisecting the village and	The Applicant is a responsible developer who has sought to engage with local communities such as Aldham, to understand potential issues and concerns as they relate

¹⁴ Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*.

Topic	Comment	National Grid's response
recreation and tourism	dominating it. Aldham has 215 houses. This is wholly unnecessary and unacceptable.	to the construction, operation and maintenance phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors, such as residential properties, as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact community facilities, recreational land and recreational routes and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Aldham Parish Council in the Environmental Statement (ES) assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. No significant adverse effects have been identified. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the

Topic	Comment	National Grid's response
		Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance¹⁵. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant notes the concern of Councillor Sara Naylor about the Project 'bisecting' and 'dominating' the village of Aldham. The Project would not bisect Aldham but would pass in proximity to the east of Aldham as shown on page 40 of 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) potential impacts on people's views. EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. Effects on visual receptors within Aldham are set out under Visual Receptor Area (VRA) D7 Fordstreet and Aldham in paragraphs 13.7.76 to 13.7.87 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects are judged to be significant and adverse within approximately 1.5 km of the Project, including from the settlement of Aldham. The following viewpoints represent views from Aldham: • Viewpoint 4.11: PRoW south of Aldham (Aldham 15) – see page 85 of 7.12 Visualisations - Part 4 of 9 [APP-346] and page 30 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]. Assessed as having a major and significant (adverse) effect. • VP 4.37: Hines Close, Aldham – see page 119 of 7.12 Visualisations - Part 5 of 9 [APP-347] and page 112 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-231]. Assessed as having a moderate-major and significant (adverse) effect.
Health and Wellbeing	Residents in the Colne Valley in my ward have shared how the pylons will overshadow	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing Electric and Magnetic Fields (EMFs), which are incorporated into the decision-

¹⁵ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
	their land and in some cases pose a health risk to occupants. This must be considered.	making process for development consent in National Policy Statement (NPS) EN-5. These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMFs and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in the 7.8 Electric and Magnetic Field Compliance Report [APP-330]. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Overall, the RVAA concludes that there are no instances where effects on residential visual amenity on any individual property within the Colne Valley would be so great that they would render those properties unattractive places to live. It is noted that some properties / property groups along the Project route do come close to this threshold and that mitigation measures have been recommended to reduce effects.

2.14 Dedham Parish Council

2.14.1 Table 2.14 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Dedham Parish Council [RR-0891]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.14 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	Dedham Parish Council wants to register its objection to National Grid’s proposed development of a transmission line from Norwich to Tilbury. Dedham is located at the heart of the Dedham Vale National Landscape. The special qualities of the Dedham Vale are associated with John Constable and the landscape he painted is still recognisable today The traditional character of the Dedham Vale comes from historic villages, such as Dedham, with timber framed housing and prominent churches. There is a sense of history and tranquillity in Dedham that has remained unspoiled and attracts visitors from all over the country and beyond. Unfortunately, the proposed pylons and related	The Project has been designed to minimise effects on Dedham Vale National Landscape (DVNL) including consideration of the Project within the DVNL and its setting. However, the Applicant notes the concerns regarding the potential effects of the Project raised by Dedham Parish Council. Paragraphs 2.9.21 to 2.9.23 of National Policy Statement EN-5 (2024) require consideration of the effects (using the term ‘harm’) on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect effects arising from infrastructure proposed outside the designated area. ‘Harm’ is not reported on in a Landscape and Visual Impact Assessment, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment¹⁶, as part of the Environmental Impact Assessment process, but it is considered in the planning balance, given use of the term in the policy above. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The Project would result in significant adverse effects on some of the special qualities of the DVNL during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant. Annex A of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] includes the DVNL Setting Study. The purpose of the study is to identify areas of the landscape that form part of the setting of the National Landscape, to inform the assessment of effects of the Project on the defined special qualities (natural beauty) of the National Landscape. The identified setting is illustrated on

¹⁶ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
	infrastructure in surrounding villages is entirely incompatible with the setting and will do significant and, most importantly, irreversible harm to this protected landscape.	Figures A13.5.4 and A13.5.5 in Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] . The Applicant has a statutory duty, in accordance with s 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120] .
Land Use	The situation is made more problematic by the proposed concentration of infrastructure by Ardleigh (on Grade 1 agricultural land) just to the south of Dedham (which inexplicably includes pylons re-tracing the route of underground cables) and will lead to unacceptable visual impact on the setting of the Dedham Vale from pylons, sealing end compounds, wirescapes and substations.	The assessment of impacts on best and most versatile land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Dedham Parish (predominantly Grade 2 and 3a). In neighbouring parishes, the extent of Grade 1 land from the detailed surveys is limited. Normal agricultural cropping can occur above underground cables, but it would not be possible to construct buildings and plant trees above them. Paragraph 4.8.70 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] refers to this aspect. In summary, we would expect normal agricultural cropping (grass, cereal, root and vegetables) to be resumed above underground cables. Uses involving support structures installed at depths presenting risk to the cables may also be able to continue by careful positioning of the structure/stake and it may also be possible to locally increase burial depth of cables. Replanting of hedgerows and establishment of scrub habitats would be acceptable, but it is not acceptable to replant trees nor establish buildings above the cable swathe. See also response to above comment. As noted above, the setting of Dedham Vale National Landscape (DVNL) is illustrated on Figures A13.5.4 and A13.5.5 in Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The Project would result in significant adverse effects on some of the special qualities of the

Topic	Comment	National Grid's response
		DVNL during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant.
Biodiversity, ecology and nature conservation	Moreover, the area south of Langham Estate down to the Black Brook, just west of Dedham, will have almost 1,000 trees, some of which are hundreds of years old, felled causing further massive impact to the views from within the protected National Landscape.	The assessment of visual effects is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] . This includes an assessment of construction activity, and the impact of vegetation removal and construction of the proposed underground cable. The visual effects during construction south of Langham Estate are assessed as major and significant (adverse) within approximately 0.5 km for Visual Receptor Areas C9 Stratford St Mary and Dedham, C10 Dedham Heath and C11 Langham as set out in paragraphs 13.6.95 to 13.6.137. The Applicant will seek to minimise effects on the National Landscape during construction through development of the detailed design (e.g. by minimising tree loss). 7.2 Outline Code of Construction Practice (Revision C) contains commitments to reduce impacts to trees; GG14 states ' <i>following detailed design the prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/hedgerow removal is reduced as far as practicable</i> '. The Applicant acknowledges that between chainage 10600 and 10700 there will be impacts to trees and are working with the design team to limit tree removals (currently circa 20 trees and two part removal of two tree groups) including the impacts to veteran trees (T566 and T563).
Landscape and Visual	In addition, the locations selected for construction compounds, construction laydown sites and access roads will be clearly visible from the National Landscape, and many listed buildings, without proper shielding from view.	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in [APP-358 to APP-360]). The Applicant acknowledges that the settings of some designated listed buildings within Dedham Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209] . Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic

Topic	Comment	National Grid's response
		Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets within Dedham Parish. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures. Construction compounds need to be sited adjacent to the cable construction swathes in order to minimise vehicle movements when transporting materials and to support efficient working. Construction compounds, construction laydown sites and access roads close to the cabling works are therefore necessary. An assessment of effects on visual receptors during construction, including effects relating to construction compounds, laydown sites and access roads, is provided in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. During construction there would be significant (adverse) effects on visual receptors in proximity to the construction works, as set out in paragraphs 13.6.59 to 13.6.70 (VRA C6 Raydon), and paragraphs 13.6.83 to 13.6.137 (VRAs C8 Higham, C9 Stratford St Mary and Dedham, C10 Dedham Heath and C11 Langham). Once the Project is operational, effects on visual receptors relating to the underground cable would not be significant, although significant effects relating to the overhead line may remain.

Topic	Comment	National Grid's response
Transport and Traffic	Finally, the disruption and danger to residents that will be caused by the re-routing of significant volumes of traffic during the construction phase onto roads that are neither suitable for HGVs nor always even able to allow two-way traffic (such as Dedham Village centre) does not appear to have been appreciated or mitigated in any way.	The Applicant has developed a construction routing strategy, which is detailed in 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the Site Access Points. There are no proposed PARs within Dedham Village Centre. The closest PAR is located on Ipswich Road, connecting the A12 to the Site Access Point (JC-B039) south of Gun Hill. There are a small number of short-term temporary diversion routes on roads surrounding Dedham Village to enable the erection of scaffold and other minor ancillary works, where background traffic would be temporarily re-routed to for temporary road closures. Roads of an equivalent standard or higher are not available in this location, and through our assessment the use of Coles Oak Lane, Grove Hill and sections of the B1029 as a diversion route have been identified to be required to manage short-term road closures. Section 5.8 of 7.3 Outline Construction Traffic Management Plan [APP-309] includes a commitment that where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Temporary road closures where diversions are necessary are expected to be for a duration of up to four weeks depending on the type of works. When considered in the context of other major infrastructure projects, this has been considered to have a slight magnitude of impact and therefore the residual effects for driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. For roads used as diversion routes resulting from temporary short term road closures, these will be carefully managed with temporary diversion route signage provided, warning signage for all road users and community engagement to ensure the safety of all road users, and will be of limited duration to reduce impacts where practicable as outlined within Section 5.8 (Traffic Management) of 7.3 Outline Construction Traffic Management Plan (Revision B). Although there may be residual effects for residents along the planned diversion routes, the impact of these will be minimised by the proposed mitigation and commitments within the 7.3 Outline Construction Traffic Management Plan [APP-309] as outlined above and are therefore not considered significant.

Topic	Comment	National Grid's response
		The principles of the proposed diversion routes have been shared with the Local Highway Authority.
Consultation	In our opinion, the public consultation had fundamental deficiencies by not adhering to the Gunning Principles	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into Examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Alternatives	our preference remains for an integrated offshore grid or underground HVDC;	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and Visual	however, if this project is to avoid irreparable damage to the Dedham Vale, significant mitigations are needed and Dedham Parish Council fully supports the position of the Dedham Vale National Landscape on this.	An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] . The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to ' <i>conserve and enhance natural beauty</i> ' in

Topic	Comment	National Grid's response
		accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. As reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of National Policy Statement (NPS) EN-1 (2024) acknowledges that '<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>' and paragraph 5.10.13, that '<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. For critical national priority infrastructure, '<i>the need case will outweigh the residual effects in all but the most exceptional cases</i>' (paragraph 4.1.7 of NPS EN-1).

2.15 Earl Stonham Parish Council

- 2.15.1 Table 2.15 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Earl Stonham Parish Council [RR-0971]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.15 Comments and National Grid's response

Topic	Comment	National Grid's response
Landscape and Visual	Earl Stonham Parish Council OBJECTS STRONGLY to the current National Grid proposals for overhead power lines on 50m high pylons cutting through the most open and beautiful parts of our parish. Suffolk is renowned for its big skies, yet these views would be lost forever as a line of pylons would stride across our parish – and as the landscape through which the pylons would cross is relatively level, they would be visible for many miles around.	The position of the Parish Council is noted. The assessment of visual effects is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] . Earl Stonham parish is assessed within Visual Receptor Area (VRA) B7 Forward Green and Creting St Mary in paragraphs 13.5.73 to 13.5.84. The assessment notes that the area provides long distance open views across farmland and that there are some long views from more open and elevated parts of the plateau. In closer views, the Project would most often be seen on the skyline, above intervening trees and hedgerows, including from Forwards Green. The landform of the Jordan Valley and vegetation would limit views south of Earl Stonham. There would be a reduction in visibility of the Project beyond 1.5 km due to intervening landform and/or layers of intervening vegetation filtering and screening views. An existing 400 kV overhead line is also present to the east of Earl Stonham parish. The assessment concludes that there would be major and significant (adverse) effects within 0.5 km of the Project, reducing to moderate and significant (adverse) up to 1.5 km and to minor and not significant (adverse) beyond 1.5 km. Three viewpoints are located within the parish, presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] . The effect on Viewpoint 2.40 A1120, Forward Green (pdf page 46) is assessed as minor and not significant (adverse). Viewpoint 2.43 PRow, Middlewood Green (Earl Stonham 8) (pdf page 55) is assessed as moderate-major and significant (adverse) and Viewpoint 2.44 Fen Lane, near Woolney Hall, north of Creting St Mary (pdf page 58) is assessed as minor-moderate and not significant (adverse).
Health and Wellbeing	The whole route from Norwich to Tilbury cuts through 183km of stunning countryside and	The Applicant is a responsible developer who has sought to engage with local communities to understand potential issues and concerns as they relate to the

Topic	Comment	National Grid's response
	would have an immense impact on the landscape and those who work or live in it or use it for recreation/health reasons.	construction and operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on sensitive receptors through routeing and design, which has meant that the Project has been able to avoid sensitive landscape and community receptors, such as residential properties, as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact local economy, local employment, tourism economy, community facilities, businesses, recreational and tourism activity and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Earl Stonham Parish Council. Effects of the Project on health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which includes an assessment of impacts as they relate to physical activity during the construction phase. The duration of effects that may potentially affect people's ability to be physically active (e.g. closures of Public Rights of Way (PRoWs)) are generally short-term, with rapid reversal / diversions in place. Alternative routes and provision of recreational areas are generally available for use for the period over which effects are predicted to last and as such, no significant effects on health and wellbeing have been identified. The Landscape and Visual Impact Assessment (LVIA) presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] acknowledges that the Project would give rise to significant adverse landscape and visual effects during both construction and operation.
Socio-economics Recreation and Tourism	Many areas of course (e.g. Dedham Vale) are a major attraction for tourists and nature lovers and, within our own parish, there are several certificated locations for	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on the tourism economy (during construction) and tourism assets (during construction and operation (and maintenance)), including visitor accommodation. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on tourism. These include traffic

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	caravans as well as Shepherd Huts for hire.	management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] , 7.2 Outline Code of Construction Practice (Revision C) and 7.3 Outline Construction Traffic Management Plan (Revision B) . No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors, including Beechwood Shepherds Huts, The Granary and Upper Langdales Farmhouse Cottages, located within Earl Stonham Parish Council in the Environmental Statement (ES) assessment.
Needs Case	Whilst we recognise the need to transition to Green Energy, we do not believe that this should be at a cost to our landscape, heritage, environment or those who live, work and visit our parish.	The Applicant notes the respondent's feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review) and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). This sets out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into a new East Anglia Connection Node (EACN) Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future – driven by the government's plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator's (NESO's) Clean Power 2030 report ¹⁷ . The need case is reviewed at each critical stage of the Project's development and without a robust demonstrable need the Project would be revised or fall away. Currently, the contracted generation shows a clear need for the Project.
Cumulative Effects	We already have a second major infrastructure project approved, a solar farm	Earl Stonham Parish is within Mid Suffolk District and is located within Section B of the Project.

¹⁷ National Energy System Operator (2024) *Clean Power 2030*

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	development (Willow Solar Farm) which is to be located on highly productive, drought-resistant agricultural land in the fields immediately adjacent to the proposed pylon route.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent and professional experts. The Willow Solar Farm was a pending application when the cumulative assessment was completed. The Solar Farm has been identified in 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] as 'Land West of Blacksmiths Lane Earl Stonham', IDBMS43. 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] identified major adverse and significant effects during construction and operation (and maintenance) in relation to agriculture and soils, due to the extent of high-quality agricultural land required. Significant cumulative effects were not assessed on any other environmental receptors.
Consultation	We believe that consultation has been and remains inadequate	It is important that we take enough time for all stakeholders to consider and respond to the materials presented at consultation. At both non-statutory consultations held in 2022 and 2023, the Applicant allowed for eight weeks. At statutory consultation we allowed for 15 weeks in which to respond. The Project is aiming to be operational for 2030, which ensures we're able to connect new sources of energy to the wider electricity network and people's homes and businesses. We are always looking at how we can be more efficient and will consider feedback and comments from the public on that point.
Alternatives	valid alternatives with less negative impacts have not been adequately presented and considered.	Alternatives have been fully considered throughout project development. The Project has been designed in line with National Policy Statement (NPS) EN-5, which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. Except in nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts. National Grid has rigorously tested all realistic alternatives to assess those impacts, including onshore alternating current (AC) cable, AC gas-insulated line, high voltage direct current (HVDC) options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socio-economic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore HVDC alternatives were substantially

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		more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity.
Needs Case	The ESO Report suggests that the energy requirements within Norfolk, Suffolk and Essex are very low and this new power line is not required to meet current and future local needs.	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the GB energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on net zero delivery. The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands.
Needs Case	Rather the main purpose of the pylons is to provide additional capacity for London and the South, and we believe these needs can better be met through alternatives which have been presented and assessed in the ESO East Anglia Network Study. Option 8 - Onshore HVDC and Option 1 – Predominantly Offshore; both options have a superior	The Applicant notes the respondent's feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review [APP-355]), and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). This sets out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into a new East Anglia Connection Node (EACN) Substation. The Project would also reinforce

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	environmental ranking to Option 3 (onshore pylons), rank equally in deliverability and operability, and have superior ranking in community sentiment. In fact, all but one of the 9 alternative options studied are superior to National Grid's Option 3.	the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future – driven by the government's plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator's (NESO's) Clean Power 2030 report¹⁸. The need case is reviewed at each critical stage of the Project's development and without a robust demonstrable need the Project would be revised or fall away. Currently, the contracted generation shows a clear need for the Project. Option 8, page 42, within the Electricity System Operator (ESO) East Anglia Network Study¹⁹ (ESO is now known as NESO), evaluates an option with 2 x 2 GW high voltage direct current (HVDC) links starting in Norwich and a 2 GW link starting from Friston. Boundary EC5N, which is the boundary between Norwich and Bramford, requires the ability to manage capacities greater than 6 GW in the near term. Therefore, an option where all HVDC connections do not start at Norwich would not meet this need. Therefore Option 8 does not meet the need. The Applicant has undertaken an appraisal of an option set out as Section 14 'Offshore 1 – Norwich to Tilbury', pages 101–108 of 7.17 Strategic Options Backcheck and Review [APP-355]. This option looked at three sets of 2 GW (6 GW) links from Norwich to Tilbury Substation as a less optimal solution that does not connect Bramford or generation at a capital cost of £4,096.50 million. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 (page 108) of 7.17 Strategic Options Backcheck and Review [APP-357] states: <i>'Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital</i>

¹⁸ National Energy System Operator (2024) *Clean Power 2030*

¹⁹ ESO (2024) *ESO East Anglia Network Study*

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		costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m)'. The Applicant has also undertaken recent work to show that the cost of HVDC cabling has lower cost in marine environments where a cable laying vessel can carry up to 100 km of HVDC cable in one operation, compared to onshore HVDC undergrounding where circa 1 km of cable can be delivered via road transport at a time. This leads to costs being 1.6 times higher for HVDC land installation than the offshore alternatives set out by the Applicant and not considered in the NESO report.
Alternatives	We also point out that National Grid are rolling out a new T-pylon design for the Hinkley Connection Project. These pylons are smaller (35m), sleeker with a single pole and T-shaped cross arms and hold the overhead power lines suspended from two diamond-shaped 'earrings'. Although more steel is used in these pylons, the base of a lattice pylon uses around three times the area and uses 1.5 times the amount of concrete, leaving less land available for farming. The operational life of a T-pylon is around the same as a traditional lattice pylon at about 70-80 years. Section 3 of the TEP report to National Grid (September 2017) in relation to the proposed use of T-pylons to	The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics²⁰ confirms that whilst T-pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low-height lattice pylon design. T-pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used. Whilst there may be some locations (for examples see Appendix C of 7.21 2024 - Design Development Report for the Project Appendices [REP1-069]) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project.

²⁰ Institution of Engineering and Technology (2025) *A Comparison of Electricity Transmission Technologies: Costs and Characteristics*

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	carry the power from Hinkley Point makes abundantly clear that T-pylons are visually much more appropriate and acceptable in a relatively flat landscape where pylons are silhouetted against the sky rather than hills and/or trees; the N2T route is almost entirely in such an open, flat landscape, with sky (East Anglia's famed 'Big Skies') as the principal backdrop.	
Historic Environment	Harm caused by the project Built Heritage Earl Stonham residents are passionate about safeguarding their precious heritage assets. The community views with dismay the harm likely to be caused by these unsightly pylons. The siting of the proposed pylons so close to Earl Stonham is bound to have a huge effect on the setting of these assets.	The Applicant acknowledges that the settings of some designated assets within Earl Stonham Parish fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets.
Historic Environment	There are 45 listed Grade 1 and Grade 2 buildings within Earl Stonham dating back as far as the 14th Century. The Grade 1 listed Church of St. Mary the Virgin is the oldest surviving building in Earl Stonham. The closest listed	The Applicant acknowledges that the settings of some listed buildings within Earl Stonham Parish fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the

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	buildings to the proposed pylon route are Spall's (Sporles) Farmhouse (2), Yewtree Farmhouse (2), The Elms Farmhouse (2), Hicks Farmhouse (2), Roydon Hall (2*), Upper Lonsdales Farmhouse (2), Fen House (2) and Fen Farmhouse (2).	setting of these assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to designated assets. The assessment presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] concluded that Roydon Hall (1033215), grade II* listed, would experience moderate adverse and significant effects during construction and operation phases. It concluded that The Elms Farmhouse (1033217), Hicks Farmhouse (1182484) and Upper Lonsdales Farmhouse (1033189), all grade II listed, would experience moderate adverse and significant effects during construction and minor adverse and not significant effects during operation. Spalls Farmhouse (1033192) and Yewtree Farmhouse (1182522), both grade II listed, would experience minor adverse and not significant effects during construction and negligible adverse and not significant effects during operation. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] concluded that the settings of Fen House and Fen Farmhouse do not extend to the Order Limits.
Historic Environment	Grade 1 and 2 listed buildings were often built with no or limited foundations and may be impacted by construction activity, including pile driving, as well as the volume of construction traffic required to deliver materials to site.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including the listed buildings within Earl Stonham Parish. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. The Project has also assessed the impact to sensitive receptors from noise and vibration during the construction phase – see 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order (Revision C) within the final Code of Construction Practice. The Project would lead to no harm or less than substantial harm to listed buildings.
Historic Environment	Archaeology. We are not aware that National Grid have or will be undertaking site surveys prior to commencing	The Applicant fully recognises the importance of safeguarding archaeological remains within the Earl Stonham area, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within

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	construction although is a normal requirement for building sites. Without such surveys there is clearly a significant risk that sites of local and national interest remain undiscovered or at risk of damage/destruction from construction.	3.1 Draft Development Consent Order (Revision C) already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation. A programme of archaeological evaluation has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground [APP-089 to APP-100 and APP-102]). All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information [AS-068 to AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,440 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.

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Historic Environment	The Suffolk Heritage Explorer provides details of Suffolk's rich archaeological heritage. The followings finds, historic buildings and location, relatively close to the pylon route have been identified within Earl Stonham: • The current route of the A1120 runs along the site of Wicks Green, dating back to Medieval times (1066 to 1539) and shown on a parish map of 1587 and Hodskinson's Map of 1783. • Early Medieval scatter, C13-C14 pottery scatter found in field adjacent to Perfect Perennials Nursey and north of Bell's Lane (A1120) • Cropmarks of possible Bronze Age Barrows east of Sporles Farm. Circular cropmarks were identified on aerial photography. These are of uniform size of c.24m and could potentially represent round barrows of possible Bronze Age date. • Roman Features 43AD to 409 AD and Roman artefact scatter C1 & C2. Features including a ditch and a small pit and finds - pottery (mainly C1 and C2), Samian, amphora, a few tile	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including archaeology). The Applicant fully recognises the importance of safeguarding built heritage assets such as Bay's Farm (2524) and archaeological remains including the ones within Earl Stonham such as Wicks Green (2380), Cropmarks NE of Bell's Lane E of Stowupland, some visible on first edition OS map, but with earlier elements (2747), and our approach is aligned with this principle. The approach for archaeological remains set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order (Revision C) already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation. The impacts of the Project on the historic environment are assessed, and the methodology is explained within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

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	fragments, coins (?Hadrian and ? an Antoninianus?) - identified after topsoil stripped for sewage pipe. Partial sectioning of the features done by contractor. Bay's Farm, Earl Stonham. 19th century farmstead and farmhouse. Regular courtyard multi-yard plan formed by working agricultural buildings. The farmhouse is set away from the yard. Total change to the farmstead layout. Located within a hamlet.	
Biodiversity, ecology and nature conservation	Environment, Habitat and Species. Any loss of well-established trees, hedgerows and field margins during construction would impact on local wildlife, causing significant habitat loss. Even if replaced like for like it would take years to regrow to maturity, and the loss of habitat would be detrimental to all wildlife in the area. There would be loss of Spinney Wood, behind Bay's Farm. There are also Tree Preservation Orders on land belonging to Stowupland Hall between the A1120 (adjacent	This area of land has been subject to a full range of ecological surveys over 2022–2025. These surveys have included habitats, bats, otters, badgers and birds (amongst others), and the results and assessment of impacts on ecological receptors are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the associated ecological appendices. Surveys have not identified the area between RG154-RG157 as being a high collision risk for birds or as an important commuting/foraging route for bats. There would be no impact on Spinney Wood as a result of the Project, with proposals carefully located to avoid the woodland. Impacts on other trees and hedgerows behind Bay's Farm, amongst other ecological features, will be refined further at detailed design stage. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain (BNG) with environmental and societal benefits. The presence of great crested newts (GCN) at various locations across the Project is acknowledged and the Applicant will obtain a District Level Licence from Natural England on consent of the Project. A signed Impact Assessment and Conservation Payment

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	to the proposed pylon construction and set down site) and Creting Lane. A range of wildlife would be potentially impacted. There are several ponds known to have newts (including Great Crested Newts) living in them, and otters have been seen locally. There also badger setts in and around the area. The pylon route is on the flight path of migratory birds and there are established bat colonies in the area which will use the hedgerows as navigation markers to their feeding areas; any hedgerow removal will have an impact on the bats. Deer also roam across the local landscape.	Certificate has been obtained from Natural England providing confirmation of this agreed licensing route for GCN. The Applicant has reviewed the assessment of the Farmstead: Bay's Farm (2524) in light of the respondent's comments. The Applicant has assigned a low value to this asset as it has been greatly altered with the loss of original historical agricultural buildings which have been replaced with modern equivalents. Value has been assigned following the methodology in 6.19 Scoping Report [APP-288 - APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using relevant guidance and professional judgement. As stated in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], the settings of all negligible and low value non-designated assets have not been assessed. This approach has been discussed and agreed with stakeholders in February 2025 as detailed in Table 11.1. Therefore, the Applicant is satisfied with its conclusion that there would be no potential for effects resulting from the Project on this asset. The Tree Preservation Order information provided identifies the trees between the A1120 and Creting Lane and are assessed as not being impacted.
Landscape and Visual	Landscape Heritage. The pylons would have a significant impact on our landscape, classified as 'Ancient Countryside' by the late Professor Oliver Rackham. We have already referred to the loss of Suffolk's famed Big Skies, with the destruction of views across open landscapes	The Applicant acknowledges Earl Stonham Parish Council's concerns relating to landscape heritage and the nature of views across the landscape. Judgements on landscape value were made as part of the assessment of landscape effects in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Landscape value judgements are detailed in Annex A Landscape Value Assessment, which is presented in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. These value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations²¹. This defines landscape value as <i>'the relative value or importance attached to different landscapes by society on</i>

²¹ Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*.

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	and the view across to the Gipping Valley would be lost forever. The pylons would be visible for many miles around.	<i>account of their landscape qualities'</i> (page 3). The value judgements were informed by a range of sources, and criteria that indicate value, including natural heritage, cultural heritage, landscape condition, associations, distinctiveness, recreational, perceptual (scenic), perceptual (tranquillity) and functional, as described in Table 1 of Technical Guidance Note 02/21. This includes consideration of the nature of views from the landscape. The assessment of landscape effects is presented in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The landscape of Earl Stonham parish lies within three Landscape Character Types: • Plateau Claylands – paragraphs 13.3.242 to 13.3.256, assessed as moderate and significant (adverse) up to 1.5 km. • Ancient Plateau Claylands – paragraphs 13.3.227 to 13.3.241, assessed as moderate and significant (adverse) up to 1.5 km. • Rolling Valley Farmlands and Furze – paragraphs 13.3.183 to 13.3.197, assessed as moderate and significant (adverse) up to 1 km. It is considered that beyond 1.5 km effects on the landscape would not be significant. See response above on the visual effects with views towards the Gipping Valley from the parish represented by Viewpoint 2.44. As set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] embedded landscape and visual mitigation measures in the vicinity of the Gipping Valley include careful consideration of the routeing of the proposed 400 kV overhead line and undergrounding of sections of existing 132 kV overhead line south of the Gipping Valley where these interact with the Project.
Land use	Highly productive farming land would be lost to productive use during construction of the pylons with an ongoing impact from pylon sites and ongoing maintenance.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping, from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Earl Stonham Parish (Grade 3a). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including

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		farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Earl Stonham Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Water environment	It is likely that construction would lead to ground compaction and therefore increase the risk of flooding in those areas.	The Applicant acknowledges that construction activities could cause ground compaction and that this could have implications for surface water flood risk. Section 4.10 of 7.9 Flood Risk Assessment [APP-331] contains an assessment of surface water flood risk during the construction of the Project. It addresses construction activities which could temporarily change existing land surface permeabilities, influence the rainfall runoff regime and disrupt existing land drainage regimes. 7.2 Outline Code of Construction Practice (Revision C) includes mitigation measures to reduce the impacts of these activities on land drainage and surface water flood risk. As per commitments AS09 and GG28, appropriate technology/material will be installed in areas where heavy equipment would be used to reduce disturbance to the ground and minimise impacts on the existing land drainage regime. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] also includes measures to help minimise impacts on the existing land drainage regime.
Transport and Traffic	There are many footpaths and public rights of way crisscrossing land along the pylon route. It is inevitable that	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during

Topic	Comment	National Grid's response
	the construction phase would impact on these, perhaps necessitating closure for weeks or months at a time, resulting in reduced access to our open countryside. Many of these footpaths form part of circular routes, which if closed, would limit access as there may be no alternative route.	construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRowWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRowW Management Plan. All PRowWs temporarily affected will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction surveys. The PRowWs in Earl Stonham, including footpaths E-227/063/0 and E-227/062/0 that form part of Earl Stonham Circular Walks Gold Route, will, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], be subject to a 'Temporary Closure (Managed)' regime, meaning they will remain accessible throughout construction on their existing alignment under a managed access regime, rather than being subject to full temporary closure. Where these PRowWs intersect with working areas or haul roads, appropriate safety measures will be implemented to allow continued safe passage for PRowW users during construction of the Project. This may include gated access of the PRowW, or haul road, or other appropriate measures, brief holding of users while a specific construction activity is paused to allow safe passage, or directing users safely around a localised working area where necessary. An assessment of pedestrian, cyclist and horse-rider delay was undertaken as detailed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. It was concluded that there would be no significant impact of delay to PRowW users once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRowW Management Plan. A recreational route assessment has also been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], where no significant adverse effects have been identified on recreational route receptors within Earl Stonham Parish Council in the Environmental Statement (ES) assessment.

Topic	Comment	National Grid's response
Health and Wellbeing	This may also impact on physical and mental health through reduced access for walking and to the countryside.	An assessment of potential impacts on recreational routes is provided in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], which identifies potential mitigation measures where appropriate to reduce negative impacts. Information relating to specific recreational routes is provided in 7.6 Outline Public Rights of Way Management Plan [APP-329]. Effects of the Project on health and wellbeing as a result of reduced access for walking and to the countryside are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which includes an assessment of impacts as they relate to physical activity during the construction phase. The assessment is informed by the findings of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] and information contained in 7.6 Outline Public Rights of Way Management Plan [APP-329]. The assessment notes that the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of Public Rights of Way (PRoWs)) are generally short-term, with rapid reversal / diversions in place. Alternative routes and provision of recreational areas are generally available for use for the period over which effects are predicted to last and as such, no significant effects on health and wellbeing have been identified.
Land and Property	Proximity to Houses and Businesses. The Pylon Route crosses the A1120, near several houses and businesses. Property values would be adversely affected for those houses and businesses close to the pylon route and it is likely to impact more widely on property values across the Parish.	Property values are influenced by many factors. While National Grid recognises that visual impact may lead to perceptions of property value loss, there is no reliable evidence that environmental effects reduce house values due to the Project. Where a property owner is not directly affected by the Project, UK law does not provide compensation for a perceived fall in property value due to proximity or changes to a view. Compensation applies where land or rights are acquired under a DCO and the retained property suffers a direct loss because of the Project. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code.
Land use	Earl Stonham is a rural area with most housing centred in small hamlets. Most of the open countryside is given over	The Applicant has taken into consideration the location of existing and proposed land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum

Topic	Comment	National Grid's response
	to crop cultivation. The impact on farming would be high during the construction phase with a loss of land available for cultivation. While this may be lower once works are completed, inevitably the pylon sites and the need for ongoing access would still reduce the amount of land available for cultivation. Such ongoing, invidious losses are significant given that the UK is not self-sufficient in food production, importing about 40% of the food it requires from outside the UK. A local plant nursery would be significantly impacted as it lies only about 250m from the pylon route.	for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. The Department for Environment, Food and Rural Affairs' UK Food Security Report 2024²² states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. It should be noted that the extent of food imports is not directly related to availability of land but to crop types, seasonality and market/consumer choices and demand. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] confirms the amount of agricultural land to be permanently impacted. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Earl Stonham Parish (Grade 3a).
Socio-economics Recreation and Tourism	There is likely to be some impact on tourism affecting those businesses operating Certificated Locations, shepherds huts or bed and breakfast/Air BnB accommodation.	Socio-economic impacts on the tourism economy and businesses are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The chapter concludes that there would be no significant adverse effects on the tourism economy and businesses within the parish as a result of the Project.

²² Department for Environment, Food and Rural Affairs (2024) *UK Food Security Report 2024*

Topic	Comment	National Grid's response
Transport and Traffic	Road Infrastructure. Residents and businesses are seriously concerned about likely disruption either to their businesses or for residents who live alongside the A1120 and all the other local roads.	The Applicant has set out the proposed construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B), which routes construction vehicles along Primary Access Routes (PARs) from the Strategic and Major Road Networks to the site access points. There is one PAR within Earl Stonham Parish, along the A1120 Church Road / A1120 Bell's Lane (PAR 16) to access RG-B093 and RG-B094. The PAR stops before the junction with Unnamed Road. Construction Heavy Goods Vehicles (HGVs) not adhering to the agreed routes is defined as a matter of non-compliance and will follow the enforcement procedure detailed in Section 6.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). With this mitigation, there should be no construction vehicle movements on other roads within the parish. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] details that the A1120 Church Road / A1120 Bell's Lane (PAR 16) would have a proposed temporary vehicle net increase of 34 vehicle movements in both the AM and PM peak hours (28 HGV movements and 6 LGV movements). This equates to a percentage increase of 2% and 3% respectively in the AM and PM peak hours. An assessment of the A1120 Church Road / B1115 Stowmarket Road Priority Junction (Site 22) was undertaken for the peak hours as presented within Section 7.11 of 7.11 Transport Assessment [APP-333]. It was found that the junction would operate over capacity in the future baseline year and the introduction of construction vehicles would increase the delay at the junction during the peak hours. Therefore, as part of mitigation set out within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B), it is proposed that construction traffic would avoid using the A1120 Church Road / A1120 Bell's Lane (PAR 16) through Stowupland during peak hours and school drop-off and pick-up times. This aims to minimise delay to drivers and improve amenity for pedestrians and cyclists, expected to be higher during these periods. The Applicant has assessed the significance of effects on driver/public transport passenger delay, and on pedestrians, cyclists and horse-riders in relation to severance, amenity and fear and intimidation along the A1120 Church Road / A1120 Bell's Lane (PAR 16). The findings of this assessment are presented within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that the increase in traffic as a result of the Project

Topic	Comment	National Grid's response
		and other committed developments would not result in any significant effects when taking account of the proposed mitigation set out within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). There are two proposed crossover points on the boundaries of Earl Stonham Parish, on Debenham Lane and Road U5219 to U5235. These routes will be subject to a short-term temporary closure for the installation of crossover bellmouths and other construction activities. Where a diversion is required, they will adopt the principle of using the same standard of road of higher, where practicable and available. The proposed diversion routes for these closures are detailed in Sheet 9 and 10 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section B [APP-034]. In accordance with commitment AS03 in the 7.2 Outline Code of Construction Practice (Revision C), where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. Furthermore, Section 5.8 of 7.3 Outline Construction Traffic Management Plan (Revision B), includes a commitment that where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Full road closures where diversions are necessary are expected to be for a duration of up to four weeks. When considered in the context of other major infrastructure projects, this has been considered to have a slight magnitude of impact and therefore the residual effects for driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact community facilities and businesses and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified on Socio-economics, Recreation and Tourism receptors within Earl Stonham Parish Council in the Environmental Statement (ES) assessment.
Transport and Traffic	The A1120 is the main route through the Parish running from the A140 to the A14. It	The Applicant is proposing a Primary Access Route (PAR) on a section of the A1120 from the A14, to Bell's Lane. The Applicant is not proposing to route any traffic from the

Topic	Comment	National Grid's response
	classified as a Zone Distribution Lorry Route (roads or parts of roads within a zone serving as a route to a local access route). It is also a diversion route for the A140 and A14 if they are closed. The A1120 already suffers from high levels of excess speed through the 30mph section through Forward Green. It is likely that residents living alongside the A1120 would experience increased noise and disruption and higher volumes of traffic during the construction phase leading to higher levels of wear and tear to the surface of the road. The proposed staging area adjacent to the A1120 to its junction with Saxham Street would emerge on to a national speed limit of 60mph.	A140 to the site access point, and no construction traffic will be travelling through Forward Green. Additionally, the Applicant is proposing to avoid construction traffic during school pick up/drop off times on the school route through Stowupland along the A1120 Church Road / A1120 Bell's Lane (PAR 16) as detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). The bellmouths proposed on Debenham Lane, are crossover bellmouths. Crossover bellmouths would be installed to allow construction traffic to continue travelling along the off-line haul road. Construction traffic is not permitted to join/leave the public highway at crossover point locations, unless detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). The construction traffic will give way to the public highway in these locations. Additionally, the Applicant is proposing to temporarily restrict the speed to 50 mph on Debenham Lane to improve the safety.
Transport and Traffic	It is inevitable that construction would require some restrictions to manage traffic on the A1120 and other roads within the parish. This may be in the form of road closures, speed restrictions (we hope) and diversions. Diversions would need to be monitored and	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to avoid construction traffic through Stowupland along the A1120 during school pick up and drop off times. The Applicant is not proposing to route construction vehicles on routes other than a section of the A1120 from the A14 to Bell's Lane. Saxham Street and Blacksmiths Lane are not identified as Primary Access Routes (as noted in the above responses). 7.11 Transport Assessment - Appendix I - Figures

Topic	Comment	National Grid's response
	enforced to avoid creating rat-runs on unsuitable (often single-track) local roads. Access by construction traffic to the northern end of the pylon route, west of Leylands Farm, would need to be from the A140, given the 7.5t weight limit along Saxham Street, and the total unsuitability of Blacksmith's Lane (a single-track road with virtually no passing places) as a short-cut for HGVs approaching on the A1120.	[APP-342] Figure 1, Page 12 of 30, details the proposed access routes to RG-B093 and RG-B094. Primary Access Routes have been assessed by the Applicant for the suitability and safe manoeuvre of two-way Heavy Goods Vehicles. The proposed mitigation is detailed in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plan [APP-312 to APP-320]. The proposed highway mitigation for the Primary Access Route along the A1120 to Bell's Lane includes vegetation removal and is displayed on Section B, Sheet 6. Temporary short-term diversions are proposed for the installation of crossover points and other construction activities. Where a diversion is required, they will follow the principle of the same standard of route or higher, where practicable and available. The proposed diversion routes for these closures are detailed in Sheet 9 and 10 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section B [APP-034]. The Primary Access Routes to the north of A1120 Bell's Lane is routed through Finningham on the B1113 Walsham Road onto Wickham Road. The construction vehicles will travel along the internal haul road.
Transport and Traffic	NB In relation to the approved solar farm adjacent to the proposed power line, Suffolk Highways have stipulated that the site must not be accessed from Blacksmith's Lane by HGVs, because of the unsuitability of the road for large vehicles. The same rationale and precedent must apply to NG HGVs.	The Applicant is not proposing to route construction vehicles along Blacksmith's Lane. Construction vehicles are proposed to travel along Primary Access Routes (PARs), to the site access points. There is one PAR within Earl Stonham Parish, along the A1120 Church Road / A1120 Bell's Lane (PAR 16) to access RG-B093 and RG-B094. The PARs within the locality of Earn Stonham Parish are detailed in 7.11 Transport Assessment - Appendix I - Figures [APP-342] Figure 1, Page 12 of 30.
Planning Policy	Breaches of the Holford Rules. We believe there are several breaches to the guidelines on overhead line routing, first formulated in 1959 by Sir	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-

Topic	Comment	National Grid's response
	William late Lord Holford, a part-time member of the CEGB. They are known as the Holford Rules and are still in use by National Grid. Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees. The proposed route sites 50m pylons in the middle of open, flat countryside which would be clearly visible for miles around and ruin the views of our big skies. Rule 5: Prefer moderately open valleys with woods where the apparent height of towers would be reduced, and views of the line would be broken by trees. This is clearly not the case as already detailed in 4 above.	359] and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
Alternatives	3. Consultation We believe the consultation process has been flawed from the outset. National	The Applicant believes consultation was proportionate. Alternatives have been fully considered throughout project development. The Project has been designed in line with National Policy Statement (NPS) EN-5, which sets a strong starting presumption in favour

Topic	Comment	National Grid's response
	Grid ruled out several alternative options to the current proposal prior to the consultation process commencing, thus denying us the opportunity to help shape the consultation. It is not a true consultation if there is only one option to consider!	of overhead lines for new electricity transmission infrastructure. National Grid has rigorously tested all realistic alternatives to assess those impacts, including onshore alternating current (AC) cable, AC gas-insulated line, high voltage direct current (HVDC) options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socio-economic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity.
Consultation	Consultation meetings have all been timed to take place during the working day, denying working people the opportunity to express their views. We appreciate that there were some online webinars, but these were limited in scope.	The Applicant aimed to hold events at a range of times on different days, including at weekends. To do so, the Applicant needed to balance a range of factors, including accessibility, venue availability and to ensure welfare. The Applicant recognises that not everyone will be able to make events, which is why webinars were held and recorded and there are other ways to ask questions, including via the project hotline, email address and freepost address should anyone wish to talk to a member of the team.
Consultation	There has been 1 venue local to Earl Stonham – Needham Market which ran from 1pm to 6pm. The general feeling was that the webinar and in-person events were disorganised, that those representing NG were not open to discussion, not all questions were answered as a result and some of those that were answered were not necessarily accurate in their response. There has also been a conflict between responses given in webinars and at in-person event.	The Applicant does not agree the event in Needham Market was disorganised but recognises public information events can be busy and that there may not always be time to answer every question asked on a webinar. The project team will always aim to answer every question, but where more information or clarification is needed, people are encouraged to email or call the project team. There should not be any conflict between answers given but recognise in person conversations may often need further input or clarification. The team at events is aware to point people towards the hotline or email address where full answers cannot be given.

Topic	Comment	National Grid's response
Consultation	National Grid has failed to give residents any faith in the process resulting in a loss of trust and confidence in National Grid and its employees. Most have been left with the impression that residents views will be ignored and that we are being presented with a 'fait accompli', with a deal reached behind closed doors.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .
Cost	In view of this we believe that National Grid's approach needs to be strategic and long-term given the number of projects under development by NG. Go back to the drawing board to bring all options into play. Cost calculations need to include whole costs not just construction costs - include impact on community and wider environmental costs. Offshore route and all other options should be brought back into play.	The Applicant notes the respondent's feedback. Construction costs are included in the overall estimated costs of each strategic option. This is set out in 7.17 Strategic Options Backcheck and Review [APP-355] (2025 SOBR). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and regulatory framework. Where the cost of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. Throughout, the Applicant has engaged with the government and our regulators regarding policy and costs for new infrastructure. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project and are contained within the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). These alternative technologies included an offshore connection using Direct Current (DC) technology, and various onshore connection options including increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables;

Topic	Comment	National Grid's response
		and Gas Insulated Line. Currently, overhead lines offer the most economic and efficient solution to transmit electricity over long distances. A full and transparent cost model is provided in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355], which sets out in transparent detail how options appraisal costs were evaluated. As part of 7.17 Strategic Options Backcheck and Review [APP-355] Section 4.6, and 7.19 2023 - Strategic Options Backcheck and Review Section 5 [APP-357], the Applicant undertook a qualitative environmental assessment and socio-economic topics as set out in our appraisal's methodology referenced above.
Needs Case	In any event, any decision on N2T is premature pending the outcome of the OCSS (Offshore Coordination Support Scheme) investigating a coordinated design for offshore energy transmission, especially in the light of the Hiorns Smart Energy Network report's conclusion that the need for additional capacity is likely to be closer to 2035 than 2030. NG's insistence on a 2030 completion date does not chime with current thinking.	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis ²³ , Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.
Alternatives	Mitigation. Whilst having made very clear our disapproval of NG's consultation processes to date, including this one, and of the proposed scheme, if the	Please refer to our response above in this table regarding T-pylons.

²³ National Energy System Operator (2024) *Clean Power 2030 - Annex 2: Networks, connections and network access*

Topic	Comment	National Grid's response
	N2T project gains approval, we seek the following mitigations: The current proposal envisages 50m tall lattice pylons on an 11m² concrete base which, in total, take up a large area of valuable productive land, and which (in NG's own research) are inappropriate in 'Big Skies', and relatively flat countryside. We request NG to use the new T-pylons which would cause less harm and have a lower impact on the environment.	
Biodiversity, ecology and nature conservation	The removal of trees, hedgerows and field margins should be avoided other than as a last resort with any replacement on a 4 to 1 basis to speed up recovery.	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] is based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows would be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. 7.2 Outline Code of Construction Practice (Revision C) contains commitment GG14, which states '<i>Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.</i>' 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) as agreed with Natural England and Local Planning Authorities. National Grid has committed to a 3 for 1 replacement tree strategy for individual and groups of individual trees.

Topic	Comment	National Grid's response
Transport and Traffic	National Grid must make and adhere to strict traffic controls to reduce the impact of construction traffic on the A1120 and all the other local roads. These must include measures to control traffic entering the staging area alongside the A1120 and the Debenham Road (Saxham Street to the A140, the installation of Speed Indicator Devices in 30mph restricted areas and improved signage and road markings to deter speeding. We would also require National Grid to reinstate the A1120 and other affected roads following the completion of construction.	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Suffolk County Council for approval post consent. The Applicant is proposing to restrict traffic on the A1120 though Stowupland to avoid school pick up and drop off times, as noted within 7.11 Transport Assessment [APP-333] and 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is not proposing construction traffic to access the internal haul road from Debenham Lane but is proposing to reduce speed temporarily to 50 mph in this location. This will be communicated through signage, following the appropriate design principles. The Applicant is proposing to undertake pre- and post-condition surveys on routes anticipated to be used by Abnormal Indivisible Loads and Heavy Goods Vehicles. In accordance with commitment GG06 in 7.2 Outline Code of Construction Practice (Revision C), a record of condition will be carried out of working areas that may be affected by construction activities. This record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the pre-condition survey.
Land and Property	There should be realistic compensation for losses for householders and businesses directly affected by the pylons	The Applicant does not currently have a discretionary purchase scheme available to the public. There is also currently no legislation in place that requires the Applicant to have a scheme in place. While we understand that our proposals may cause concerns about visual impact and about property value, UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

2.16 East Bergholt Parish Council

- 2.16.1 Table 2.16 below outlines the Applicant's comments on the Relevant Representation (RR) provided by East Bergholt Parish Council **[RR-0972]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.16 Comments and National Grid's response

Topic	Comment	National Grid's response
Transport and Traffic	I am writing to formally object to the National Grid's Norwich to Tilbury pylons Development Consent Order. My primary concern relates to the significant increase in traffic congestion anticipated due to the planned closures of the A12 during construction. This will inevitably lead to increased traffic volumes passing through East Bergholt and other local communities, causing severe disruption, increased pollution, and safety risks to residents.	The Project is proposed to cross the A12 in two locations. To ensure the safety of road users the Applicant would install safety netting across the road at these locations, which would require very short, temporary closures of the A12 for up to approximately 4 hours. The Applicant is proposing to undertake the temporary closures overnight to minimise the disruption. The Applicant will coordinate with local authorities, communities and highway authorities, and work to agreed traffic management plans to ensure any disruption is kept to a minimum. The Applicant has produced 7.3 Outline Construction Traffic Management Plan (Revision B). Where a diversion is required, they will follow the principle that they will use the same standard of road, or higher where practicable and available.
Alternatives	Furthermore, I strongly oppose the use of overhead pylons as the method for this infrastructure upgrade. There are far less harmful and more modern alternatives available that National Grid should be required to consider, such as high voltage direct current (HVDC) underground cables,	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic

Topic	Comment	National Grid's response
	offshore coordination, and upgrading the existing grid using the most up-to-date technology. These alternatives would avoid the environmental, visual, and community impacts caused by overhead lines and associated works.	Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	In summary, the project as currently proposed will cause unnecessary harm to local communities through traffic disruption and the use of visually intrusive pylons, when better alternatives exist. I urge the Planning Inspectorate to reject this application or require a significantly improved solution that minimises impacts on communities and the environment.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. In terms of the consideration of alternatives as part of the examination of the substantive case, National Policy Statement (NPS) EN-1 (2024) indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and, second, that only alternatives that can meet the objectives of the proposed development need to be considered. NPS EN-1 paragraph 4.3.22 explains that the Secretary of State will be guided by whether there is a realistic prospect of the suggested alternative delivering the same infrastructure capacity, the same energy security, the same climate change, and the same environmental benefits as the proposal in the same timescale as the proposed development. NPS EN-5 (2024) says that overhead line is the strong starting presumption for electricity network developments in general, having regard to that duty. That strong starting position is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where

Topic	Comment	National Grid's response
		their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the presumption and the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance²⁴. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.

²⁴ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

2.17 East Suffolk Council

- 2.17.1 Table 2.17 below outlines the Applicant's comments on the Relevant Representation (RR) provided by East Suffolk Council (ESC) [RR-0973]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.17 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	ESC is a neighbouring authority to the proposed 400kV electricity reinforcement between Norwich to Tilbury. ESC limits its comments primarily to the need case presented for the project and alternatives, assessment of impacts in specific areas, and community benefits. ESC defers detailed technical comments to the host authorities along the route. ESC has provided comments regarding need case, offshore alternatives, landscape and visual, cumulative impacts, and community benefits. ESC will continue to monitor the topics discussed within this Relevant Representation throughout the DCO examination period. Our attendance at hearings is not expected to be required, with	Noted.

Topic	Comment	National Grid's response
	any related matters being dealt with via written representations as deemed necessary over the course of the DCO examination period. ESC submitted a Relevant Representation letter by email which has been sent directly to PINS and should be attached to this form.	
N/A	East Suffolk Council (ESC) understands that the Norwich to Tilbury project was accepted for examination on 26th September 2025 by the Planning Inspectorate (on behalf of the Secretary of State for Energy Security and Net Zero). National Grid Electricity Transmission (NGET) wrote to ESC on 13th October 2025 in accordance with Section 56 of the Planning Act 2008 'notifying persons of accepted application', inviting the Council to register with PINS should we wish to become an Interested Party by making a Relevant Representation. ESC is a neighbouring authority to the proposed 400kV electricity reinforcement between Norwich to Bramford,	Noted.

Topic	Comment	National Grid's response
	and Bramford to Tilbury. The Council's initial comments on the project and consultation material have been provided below in the form of a relevant representation.	
N/A	NGET contacted ESC as a prescribed consultee under Section 42(1)a and b of the 2008 Act, in accordance with section 43 'local authorities for the purpose of section 42(1)b'. ESC is a neighbouring authority and not one within the primary study areas in the Preliminary Environmental Information Report (PEIR), noting that the order limits do not fall within the East Suffolk District and no infrastructure is therefore proposed within ESC. On that basis, ESC limits its comments primarily to the need case presented for the project and alternatives, assessment of impacts in specific areas, and community benefits. ESC defers detailed technical comments to the host authorities along the route.	Noted.
Consultation	ESC's previous engagement with the project includes our responses to the non-statutory	The Applicant's response to pre-application consultation feedback is provided in 5.1 Consultation Report [APP-066] .

Topic	Comment	National Grid's response
	consultation (April-June 2022), EIA Scoping (November-December 2022), the second round of non statutory consultation (June-August 2023), and our Statutory Consultation (April-July 2024).	
Cumulative Effects	While the project is outside our district, we intend to monitor its progress given potential regional and cumulative implications.	Noted.
Needs Case	As previously outlined in our statutory consultation response, the Applicant's Design Development Report (DDR) presented at that time stated that reinforcement is needed to allow for sufficient capacity for new renewable energy generation. Similarly, the Strategic Options Backcheck and Review (SOBR) stated that without this reinforcement the capacity of the East Anglia and South East existing network is insufficient to accommodate new power sources moreover preventing export of power to demand centres beyond East Anglia. At that time, ESC noted the need case provided for the	The Applicant acknowledges this update from ESC on their consideration of the submitted 5.15 Design Development Report [APP-122] .

Topic	Comment	National Grid's response
	reinforcement project and the further detail provided in the SOBR on existing and planned future generating capacity and forecast demand in East Anglia. ESC has reviewed the Applicant's submission materials including [APP-122] 5.15 Design Development Report (Final Issue A) and notes that this has reviewed the existing need case for reinforcement between Norwich and Tilbury and confirms that the existing strategic proposal remains the best option. The submitted DDR [APP-122] indicates within Section 2.4 that the existing electricity transmission grid in East Anglia is at full capacity and even with the other powerlines proposed (including the Sea Link high voltage direct current undersea link between Suffolk and Kent (if consented), and the consented Bramford to Twinstead 400kV grid reinforcement), and also accounting for the upgrading of existing lines with new wires, there is still a need to increase	

Topic	Comment	National Grid's response
	capacity between Norwich and Tilbury. ESC notes that [APP-122] states in Section 2.4.7 that 'Across all environmental, socio-economic, and technical domains, the review found no material changes that would alter the strategic conclusions reached in 2024. Updates to flood mapping, legislative changes (e.g. strengthened AONB duties), and reviews of new developments and infrastructure have been considered, but none were found to significantly impact the strategic viability of the assessed options'.	
Needs Case	As set out in our statutory consultation response to the Applicant, ESC noted the concerns raised by other stakeholders about the prematurity of the delivery of the Norwich to Tilbury project. At that time the Hiorns report (jointly commissioned by Suffolk County Council, Essex County Council, and Norfolk County Council on behalf of all	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis²⁵, Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is

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

Topic	Comment	National Grid's response
	local authorities on the proposed route) concluded in Section 1.3 that <i>'if all the Generation which is presently contracted proceeds in accordance with its contracted dates, then there is a requirement for additional transmission capacity' between Norwich to Tilbury. However, the report also concluded in Section 1.4 that 'The ESO have noted that 70% of Generation projects listed in the Generation Contracted may never be built and it should also be noted that many of the projects which are eventually built come online later than their contracted dates. In looking at a range of more credible scenarios there is significant uncertainty with regard both the required volume of additional transmission capacity and timing when all this additional transmission capacity will be required.'</i> This remains a concern for ESC as it is therefore apparent that the project is not required until the mid-2030s as previously raised in our statutory consultation	reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.

Topic	Comment	National Grid's response
	response. ESC also noted at the time of the statutory consultation that other stakeholders asked for a pause on the project to allow the full assessment of the potential alternatives.	
Needs Case	In contrast, Section 2.5.21 within the submitted DDR [APP-122] states that <i>'delays to the project would cause significant additional constraint costs between 2030-2040 which would fall to energy consumers'</i>, with Section 2.5.22 adding that this would also risk <i>'the delivery of a clean power system by 2030 in conflict with the identification of the Norwich to Tilbury Project as a Critical National Project'</i>. ESC therefore maintains concerns over project prematurity and the certainty of future connections underpinning the need case presented. This is particularly relevant to ESC as we are currently also in examination for the NGET Sea Link project and one of the primary concerns forming part of ESC's objection is project prematurity	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the GB energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on net zero delivery.

Topic	Comment	National Grid's response
	and the uncertainty surrounding the timing (and viability) of future energy generation and/or interconnector project connections. With future energy generation due to connect into the network still yet to be energised, and with planned interconnector projects still yet to be consented, the premature delivery of the Sea Link project is considered to have restricted meaningful coordination with other projects in that region. It is apparent that a similar argument can be made regarding the timing and certainty of future generation and connection agreements related to and underpinning the need case presented by NGET for the Norwich to Tilbury project. Such prematurity may also have restricted the meaningful consideration of alternatives to overhead transmission lines being introduced. ESC's current position on the Norwich to Tilbury project therefore remains one of concern, reflecting the findings	

Topic	Comment	National Grid's response
	set out in the Hiorns report as stated earlier.	
Alternatives	ESC notes the inclusion of updated and detailed cost analysis for the project and alternative options within the SOBR (APP-355), such as offshore alternatives advocated for by Suffolk County Council (SCC). However, the reasoning presented by the Applicant for the rejection of alternative options detailed in the Environmental Statement (ES APP-281 Section 3), DRR (APP-122 chapter 2 and 4) and Design and Access Statement (DAS) (APP-353 Chapter 5) are also noted. These alternative options were considered by the Applicant to be technically deficient due to: • Poor System Flexibility, failing to provide the required two-directional flow flexibility essential for the overall transmission system, unlike the proposed onshore AC circuits. • Additional Cost and Infrastructure, where an unacceptable addition of onshore infrastructure,	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357], the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.

Topic	Comment	National Grid's response
	including three 2000 MW multi-terminal HVDC converters at Bramford and associated cabling, is required, also incurring greater costs. ESC continues to support genuinely coordinated offshore solutions where they would not result in significant additional onshore infrastructure.	
Landscape and Visual	ESC defers detailed technical comments to the host authorities, however, wishes to highlight our position regarding above ground infrastructure within the setting of the National Landscape. This can have a significant impact on its value, and ESC notes that National Policy Statement (NPS) EN-5 sets out a clear notion that landscape and visual impacts should be mitigated as far as possible if the proposal crosses Nationally Designated landscapes.	Annex A of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] includes the Dedham Vale National Landscape (DVNL) Setting Study. The purpose of the study is to identify areas of the landscape that form part of the setting of the National Landscape, to inform the assessment of effects of the Project on the defined special qualities (natural beauty) of the National Landscape. The identified setting is illustrated on Figures A13.5.4 and A13.5.5 in Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. In accordance with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024), the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 (2024) policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 (2024) policies on undergrounding.
Alternatives	ESC consider that overground cabling could result in widespread and significant adverse landscape impacts and so our previous position set out at the time of the statutory	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes.

Topic	Comment	National Grid's response
	consultation regarding the use of underground cables to minimise these potential impacts remains.	In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
Cumulative Effects	East Suffolk is host to numerous consented, planned, and known Nationally Significant Infrastructure Projects (NSIPs). The proposed Order Limits of Norwich to Tilbury are outside the boundary of East Suffolk however, the Order Limits sit within the wider context, both spatially and temporally with several other projects, namely East Anglia One North and Two, East Anglia ONE and THREE (both connecting at Bramford), North Falls, and Five Estuaries offshore windfarms, Sea Link reinforcement project, the LionLink multi-purpose interconnector, and the	An assessment of inter-project cumulative effects has been undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] and is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The inter-project cumulative assessment presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination (as appropriate). East Anglia Three, North Falls and Five Estuaries offshore windfarms have been considered within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The inter-project cumulative assessment concludes that negligible and not significant effects would be expected in relation to socio-economics recreation and tourism, ecology and biodiversity, contaminated land geology and hydrogeology, hydrology flood risk and land drainage, health and wellbeing, historic environment, noise and vibration, and air quality. Moderate adverse and significant effects could not be ruled out in relation to construction effects for landscape and visual,

Topic	Comment	National Grid's response
	Sizewell C new nuclear project. Other projects with connection offers in the wider area should also be factored into the assessment of cumulative impacts. ESC has previously raised concern about the cumulative impact on communities and the environment of the Norwich to Tilbury project in combination with other consented, planned, and known energy projects. The full cumulative effects of the project in combination with other consented and planned NSIPs must be fully and robustly assessed. ESC continues to reiterate the importance of thorough assessments of cumulative impacts of large-scale energy infrastructure projects. Suffolk, and East Suffolk in particular, is host to multiple consented, planned, and known NSIPs which are likely to have both spatial and temporal overlap. As such, proper and reasoned assessment of cumulative impacts is imperative. This is reflected in East Suffolk's Local Development Plan. Policy	and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils. The following developments were not considered in the Development Consent Order (DCO) application cumulative effects assessment, due to their distance from the Project: • East Anglia ONE offshore wind farm is approximately 27 km from the Project's Order Limits • East Anglia TWO offshore wind farm is approximately 27 km from the Project's Order limits • SEALink is over 30 km from the Project's Order Limits • Eurolink (LionLink) is approximately 30 km from the Project's Order Limits • Sizewell C is over 30 km from the Project's Order Limits.

Topic	Comment	National Grid's response
	SCLP3.4 – Proposals for Major Energy Infrastructure Projects of the adopted Suffolk Coastal Local Plan states the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities. All opportunities to minimise the adverse impacts should be explored and where appropriate, sufficient mitigation and compensation provided.	
Socio-economics, recreation and tourism	ESC acknowledges that upgrading and reinforcing the existing electricity transmission network will play an important part in enabling the development of renewable and low carbon energy generation and contributing to the government's ambition to reach Net Zero. However, consideration must still be given to the potential impacts	The government has published guidance on community funds for transmission infrastructure. In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance²⁶.

²⁶ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
	this proposal, and other proposed projects, may have on the landscape, natural environment, and local communities set to host such development. Given the scale and rate of infrastructure delivery necessary in the coming years to meet Net eZero ambitions, ESC considers it is important for projects to provide tangible and direct community benefits to communities hosting national infrastructure. The benefits of low carbon energy production and distribution are felt nationally, but the potential adverse environmental, social, and cumulative effects are felt at a local scale, by host and neighbouring communities. ESC supports thorough consideration of any potential community benefits scheme as secondary mitigation, in addition to primary and embedded mitigation. ESC continues to encourage National Grid to maximise the potential benefits of the project by seeking to provide a community benefit scheme to	

Topic	Comment	National Grid's response
	deliver benefits for affected communities along the proposed route, including exploring opportunities to coordinate community benefits with other National Grid projects in the region.	
N/A	ESC will continue to monitor the topics discussed within this Relevant Representation throughout the DCO examination period. Our attendance at hearings is not expected to be required, with any related matters being dealt with via written representations as deemed necessary over the course of the DCO examination period. If you would like to discuss any of the comments made in this response further, please do not hesitate to contact ESC using the above contact details.	Noted.

2.18 Eight Ash Green Parish Council

- 2.18.1 Table 2.18 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Eight Ash Green Parish Council **[RR-0986]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.18 Comments and National Grid's response

Topic	Comment	National Grid's response
Need for and the benefits of the proposed development	While accepting the need to move power from the North Sea to London, Eight Ash Green Parish Council objects to the National Grid Norwich to Tilbury pylons proposal. This is on the basis of the arguments set out in consultation responses in 2022 and 2023 by the Essex Suffolk Norfolk Pylons action group, whose submissions, including to this Statutory Consultation, we endorse.	Noted.
Consultation	We believe consultation has been, and remains inadequate;	The Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the legal requirements of the Planning Act 2008, the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our

Topic	Comment	National Grid's response
		application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Alternatives	Valid alternatives have not been presented and the harm of National Grid's preferred solution significantly outweighs the benefits. Alternatives we support are: • fully integrated offshore grid • Or HVDC from Norwich to Tilbury, either underground or subsea. The subsea option includes a platform for Five Estuaries and North Falls, which we welcome.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and Visual	The harm caused by the project as proposed can, in our view, be summarised as follows: • the permanent scar on the countryside. The Colne Valley views are of rolling farmland and open countryside. These huge structures will blight these views and ruin the natural setting. A price cannot be placed on this.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project raised by Eight Ash Green Parish Council. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement (NPS) EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Eight Ash Green Parish Council, which includes part of the Colne Valley, are set out under Visual Receptor Area (VRA) D6 West Bergholt, Fordham Heath and Eight Ash Green in paragraphs 13.7.64 to 13.7.75 in 6.13.A3

Topic	Comment	National Grid's response
		Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Eight Ash Green Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Colne River Valley Slopes Landscape Character Area (LCA) in paragraphs 13.3.543 to 13.3.558, Colne River Valley Floor LCA in paragraphs 13.3.559 to 13.3.572, Easthorpe Farmland Plateau LCA in paragraphs 13.3.589 to 13.3.603 and Great Tey Farmland Plateau LCA in paragraphs 13.3.573 to 13.3.588.
Transport and traffic	Access routes to pylon sites will be required across the county. Roads will be built ruining further pieces of the countryside.	As detailed within 6.4 Environmental Statement Chapter 4 – Project Description [APP-130], no physical works associated with permanent access routes to pylons are proposed. These are proposed rights of access only to allow for any maintenance or refurbishment required. Where permanent access routes are proposed which would require physical works, these are limited to Cable Sealing End compounds and new substations. Permanent accesses areas are shown on 6.4.F2 Environmental Statement Figure 4.2 – Proposed Project Design – Permanent Features [APP-134] with details included in 6.4 Environmental Statement Chapter 4 – Project Description [APP-130]. The Applicant sets out the proposed construction routeing strategy in the 7.3 Outline Construction Traffic Management Plan (Revision B). Construction vehicles will route from the Major and Strategic Road Networks to the site access points along Primary Access Routes. Construction vehicles will then use the offline haul road to travel along the Project corridor. The haul road will be removed following completion of construction. 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in Outline CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by commitment GG33, with ecological constraints covered by commitment B02. Measures to protect land, soils and drainage systems are addressed in Outline CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice

Topic	Comment	National Grid's response
		Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in Outline CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through Outline CoCP Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision B) [REP2-004].
Biodiversity, ecology and nature conservation	There will be substantial negative impact on wildlife through habitat destruction and noise.	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to vegetation will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. Indirect effects on ecological features (such as bats and birds) arising from the noise of temporary construction elements (i.e. haul roads, access tracks, temporary construction

Topic	Comment	National Grid's response
		compounds) and/or operational use of permanent assets (i.e. substations, Cable Sealing End (CSE) compounds, permanent access roads for substations/CSE compounds) have been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No significant residual effects on ecological features as a result of construction or operational noise have been identified, including in Eight Ash Green Parish.
Transport and Traffic	Transport and implications. Thousands of tons of aggregate will need to be delivered across the county. This will necessitate using A roads and many country B roads. Such a massive increase in traffic will cause substantial damage. Noise pollution will be excessive and congestion horrendous. neighbouring villages will be ruined with planned routes directly overhead.	The Applicant has developed a construction routeing access strategy, detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The strategy routes construction vehicles along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. Each PAR has been assessed and indicative mitigation proposed to enable the safe movement of two-way Heavy Goods Vehicles (HGVs). A PAR is proposed through Eight Ash Green, on the A1124 (PAR 37) from the A12. 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] presents the assessment of PAR 37 which identifies an increase in total traffic movements of 7% during the worst-case construction period for a duration of one week. Image A16.4.37 indicates the total daily construction traffic flow on the A1124 throughout the construction period. The assessment of effects on pedestrians, cyclists and horse-riders amenity is presented within Table A16.4.5. It was found that there would be a temporary moderate significance of effect on amenity and the Applicant has identified the following potential mitigations along the A1124 as detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B): • Updating the driver management pack to reflect that pedestrians may be in the highway, walking either on verge or carriageway • Ensuring adjacent vegetation is maintained to keep the verge clear and allow full width of footway to be utilised • Use warning signage to warn drivers of upcoming pedestrians crossing the carriageway. As detailed in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the Applicant is proposing an additional 42 HGV movements (2% increase) in the AM and PM peak hours along the A1124 (PAR 37) for a peak duration of one week. The Applicant has completed junction modelling on the A12 J26 Eight Ash Green Interchange (Site 46) presented

Topic	Comment	National Grid's response
		within Section 7.11 of 7.11 Transport Assessment [APP-333]. The modelling assessment identified that the signalised junction would operate within capacity with the proposed addition of construction traffic. In line with National Policy Statement EN-1 (2024) paragraph 5.4.13, the Applicant has developed 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]: <i>'In the event that development consent is granted for the Project, National Grid in collaboration with the appointed Main Works Contractor(s), will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items.'</i> The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post consent.
Transport and Traffic	Public rights of way/countryside walks. It is difficult to estimate the damage that will be done not only in terms of ruining the view but also the routes based on the access roads required	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRoW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329] and will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan. The final PRoW Management Plan will be submitted to, and approved by, the relevant planning authority.

Topic	Comment	National Grid's response
		Where PRowS interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented to allow continued safe passage for PRow users during construction of the Project, in line with 7.6 Outline PRow Management Plan [APP-329]. Advance signage and communication will be provided to ensure users are fully informed, and temporary PRow closures and diversions will be coordinated with other local works to avoid concurrent impacts. All PRowS temporarily affected will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRow management arrangements are developed. A recreational route assessment has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant adverse effects have been identified for PRowS within Eight Ash Green Parish in the Environmental Statement (ES) assessment. Please refer to response above under 'Landscape and Visual' topic regarding the effect on people's views within Eight Ash Green Parish.
Land Use	The erection of these pylons and all the associated roadworks will permanently remove swathes of excellent agricultural land for food production. Most political parties believe we should be far more self-sufficient in producing our own food and not rely so heavily on imports. The pylon proposal is completely contradictory to this policy.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Eight Ash Green Parish (likely to be a mix of Grade 2, Grade 3a and Grade 3b as is present within the Order Limits adjacent to the parish boundary). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their

Topic	Comment	National Grid's response
		operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to protect the soil resource to be implemented during construction across the Project, including in Eight Ash Green Parish, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Alternatives	We have consulted with our residents and wish to make it clear that there is very little support for the pylon proposal. It is clear that most people believe that cost has been the driver here and rather than the long term well being of the environment in which we live.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Transport and Traffic	We have made it clear that we are very much against this proposal. But should it gain approval we would seek the following mitigants: offsetting CO2 emissions for substantial traffic increase	Controls, mitigation measures and monitoring for the impacts associated with the construction of the Project are detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). 7.3 Outline Construction Traffic Management Plan (Revision B) has been developed in consultation with Local Planning Authorities. The Applicant will put robust measures in place to ensure the Main Works Contractor(s) adhere to the measures outlined within 7.3 Outline Construction Traffic Management Plan (Revision B), with the Applicant retaining overall responsibility.

Topic	Comment	National Grid's response
	• higher pollution through villages and near schools • we would require limitations on vehicle movement number and times • recourse for road erosion and other damage	It is anticipated that the Main Works Contractors will implement a monitoring and reporting system to check compliance with the measures detailed in the CTMP. The proposed measures and controls within 7.3 Outline Construction Traffic Management Plan (Revision B) include: • Working hour restrictions (secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C)) • Pre-and post-condition surveys • Traffic management and monitoring • Defined Heavy Goods Vehicle (HGV) routes • HGV timing restrictions • Communication Strategy • Necessary escort, permits and traffic management for Abnormal Indivisible Loads (AILs) • Driver Information Pack to minimise/safely manage interactions with pedestrians and cyclists. Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B) details the role of the Community Liaison Officer, which is anticipated to include keeping members of the community and local businesses regularly informed of the works and any heavy traffic periods. A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. The Outline Construction Traffic Management Plan is secured through Requirement 4 of 3.1 Draft Development Consent Order (Revision C).
Biodiversity, ecology and nature conservation	Joint studies required to agree any diversions to protect ancient trees or hedgerows	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including ancient woodland, veteran trees and hedgerows in Eight Ash Green Parish. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on these important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys was undertaken, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts

Topic	Comment	National Grid's response
		on valuable habitats. In addition, 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] discusses in detail the potential impacts to ancient woodlands and veteran trees and provides appropriate mitigation/compensation measures. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and not expected until May 2026). The Applicant has committed to delivering 10% BNG with environmental and societal benefits for the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
General	We object to the proposed project	Noted. The Applicant has responded in detail to Eight Ash Green Parish Council's specific concerns about the Project in the above rows in this table.

2.19 Essex Resilience Forum - Essex Fire & Rescue

- 2.19.1 Table 2.19 below outlines the Applicant's comments on the Relevant Representation (RR) provided by the Essex Resilience Forum – Essex Fire and Rescue **[RR-1088]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.19 Comments and National Grid's response

Topic	Comment	National Grid's response
Safety and Security	Understand the community impact during the installation, build and transportation of items to construction sites.	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for traffic and transport impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post DCO consent. Section 5.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) provides commitment on the Applicant's approach to ensuring the 'blue light services' will be given written notices of any planned temporary lane or road closures and Abnormal Indivisible Load (AIL) deliveries. The Applicant anticipates that the appointed Main Works Contractor(s) will develop an Incident Management Plan in agreement with the blue light services to develop a procedure for any incidents on the road network proposed to be utilised by the Project. The 7.11 Transport Assessment [APP-333] provides details of the potential transport impacts as a result of the construction traffic. The Applicant has undertaken junction modelling and has proposed (or is discussing with Essex County Council and/or National Highways) any required mitigation to support the safe operation of the road network and reduce driver delay. An assessment of community impact as it relates to health and wellbeing (for example road safety and access to social infrastructure) is presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This is informed by findings from 7.11 Transport Assessment [APP-333] and mitigation as set out in 7.3 Outline Construction Traffic Management Plan (Revision B). No significant effects are identified.

Topic	Comment	National Grid's response
Safety and Security	Understand the impact of the plan on Essex Emergency Plans.	The Applicant recognises the importance of robust safety protocols and effective emergency response arrangements for the Project. The Applicant and its contractors operate in accordance with UK Health and Safety law, including the Construction (Design and Management) Regulations 2015. This ensures that construction works undertaken are planned and managed in a safe and responsible manner. As set out in 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP), the Outline CoCP '<i>provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project</i>'. In accordance with the Construction (Design and Management) Regulations 2015, the Main Works Contractor(s) must have a construction phase Safety Health and Environment (SHE) Plan agreed by the Applicant and in place prior to construction works commencing. The Applicant and its contractors work to established safety management systems, supported by site-specific Safety Management Plans, Risk Assessments and Method Statements, and Emergency Response Plans, which would be followed in the event of an incident on site. These plans are regularly reviewed and, where relevant, include procedures for technical rescues, such as those involving Mobile Elevated Working Platforms (MEWPs). These arrangements may be developed and demonstrated with the involvement of the emergency services. The majority of the Applicant's existing transmission network is constructed from overhead lines, which are a proven and reliable form of electricity transmission in the UK. Overhead lines are designed and constructed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example with regard to climate change) would need to be applied to the entire network. At this stage no known changes are required for a new overhead line project. Unforeseen events of sufficient severity to cause damage to infrastructure are very rare in the UK but do occur. Overhead lines may be subject to adverse weather conditions such as high wind speeds and lightning strikes, and also, due to disruption from external factors such as sabotage. To reduce sabotage from the ground as far as reasonably practicable, the Applicant installs anti-climb measures such as barbed wire on pylons. However, the possibility of interference remains as pylons are typically situated in isolated

Topic	Comment	National Grid's response
		locations where constant surveillance is impractical. To manage this, the Applicant undertakes intermittent surveys to monitor the condition and integrity of pylons, conductors, insulators and associated equipment. In the unlikely event that an overhead line was to be damaged, the Applicant's network-wide monitoring system would detect the fault immediately and initiate fail-safe procedures, automatically tripping the affected circuit and stopping the flow of electricity. Overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology, resulting in comparatively shorter outage durations and enabling the system to be returned to full operation more rapidly. We also undertake regular inspections of the overhead line using thermal imaging to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.
Safety and Security	Understand any risks associated to the construction, transportation and community impact.	General construction impacts would be mitigated through mitigation measures outlined in 7.2 Outline Code of Construction Practice (Revision C). The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from construction traffic. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post consent. Section 5.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) provides commitment on the Applicant's approach to ensuring the 'blue light services' will be given written notices of any planned temporary lane or road closures and Abnormal Indivisible Load (AIL) deliveries. The Applicant anticipates that the appointed Main Works Contractor(s) will develop an Incident Management Plan in agreement with the blue light services to develop a procedure for any incidents on the road network proposed to be utilised by the Project. The 7.11 Transport Assessment [APP-333] provides details of the potential transport impacts as a result of the construction traffic. The Applicant has undertaken junction modelling to understand any required mitigation to support the safe operation of the road network and reduce driver delay.

Topic	Comment	National Grid's response
		An assessment of community impact as it relates to health and wellbeing (for example road safety and access to social infrastructure) is presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This is informed by findings from 7.11 Transport Assessment [APP-333] and mitigation as set out in 7.3 Outline Construction Traffic Management Plan (Revision B). No significant effects are identified.
Safety and Security	All of the above will allow ERF Partners to collaborate and prepare with the effect of the construction and new site developments. Partners will be informed of community impact and prepare plans to respond and recover. The purpose of the ERF Secretariat is to share information and provide a place for partners to collaborate on emergency preparedness including, risks, plans, training, exercising and learning with the community of Essex to provide resilience.	The Applicant acknowledges this comment and provides a response to each point in the RR above. The Applicant considers that the commitments in 7.3 Outline Construction Traffic Management Plan (Revision B) are sufficient to address the particular concerns raised by ERF.

2.20 Feering Parish Council

- 2.20.1 Table 2.20 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Feering Parish Council **[RR-1112]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.20 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	Feering Parish Council wishes to register as an Interested Party in the National Grid Tilbury to Norwich Pylon Scheme. We seek to reserve our right to comment on behalf of both the Parish Council and the residents of Feering regarding the potential impacts of the proposed new pylons and overhead transmission lines within the Parish. These impacts include effects on residential areas	Noted.
Land use	These impacts include effects on [...] agricultural land, and the surrounding countryside	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, which shows the extent of each land grade within Feering Parish (predominantly Grade 3a with a small extent of Grade 3b). Soil management measures to be implemented during construction across the Project, including across Feering Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the

Topic	Comment	National Grid's response
		stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its ALC grade, or as agreed with the landowner. The impact of the Project on the surrounding countryside is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on views across the surrounding countryside on visual receptors within Feering Parish are set out under Visual Receptor Area (VRA) E1 Coggeshall, VRA E2 Rivenhall and VRA E3 Kelvedon and in paragraphs 13.8.1 to 13.8.34 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects are assessed as significant within 1.5 km for visual receptors. Viewpoint 5.02 and Viewpoint 5.05 represent views within the parish. Effects on these views are set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. The landscape of Feering Parish lies within two Landscape Character Areas (6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]): • LCA B4 Gosfield Wooded Farmland – paragraphs 13.3.637 to 13.3.653 assessed as moderate and significant (adverse) up to 1.5 km • LCA C6 Blackwater and Brain Valley – paragraphs 13.3.679 to 13.3.698 assessed as major and significant (adverse) up to 0.5 km, reducing to moderate and significant (adverse) up to 1.5 km. It is considered that beyond 1.5 km effects on the landscape would not be significant. These landscape assessments assess the impact on the characteristics of the landscape surrounding the Project.
Transport and Traffic	[These impacts include effects on...] as well as on local roads and public rights of way	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated.

Topic	Comment	National Grid's response
		In the vicinity of Feering, Kelvedon Footpaths 2, 4, 5 and Bridleway 1 will require temporary diversions, during which users will be diverted around the perimeter of the relevant construction working areas. For the remainder of the period during which these PRowS are affected by the Project, they will remain open on their existing alignment, with access managed as necessary in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Feering Footpath 4, Bridleway 2 and Kelvedon Footpath 29 will all remain open on their existing alignments throughout construction, with access managed as required at points where they interact with construction activities, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Where managed access PRowS intersect with working areas or haul roads, appropriate safety measures will be implemented to allow continued safe passage for PRow users. This may include gated access of the PRow or haul road or other appropriate measures, brief holding of users while a specific construction activity is paused or directing users safely around a localised working area where necessary. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction surveys. Therefore, it is not considered that there is any significant impact to the delay of the PRow users once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. The Applicant has developed a construction routeing strategy in 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic and Major Road Networks to access the region, then Primary Access Routes to reach the site access points. From these site access points, traffic will be routed off the public highway along temporary haul roads to access the construction sites. There are no Primary Access Routes identified within the Parish of Feering. Crossover bellmouths are proposed in locations where the haul road crosses the public highway, but are not proposed for construction traffic to transition to or from the public highway (except in emergency situations). Traffic management will be provided in

Topic	Comment	National Grid's response
		accordance with Traffic Signs Manual Chapter 8²⁷, proportionate to the type of road, duration of works and volume of traffic. Traffic management measures may include temporary traffic signals or manned stop and go boards. In some instances, there will be the need for road closures, particularly on narrow or single track roads. Specific locations, timings and the specific traffic management measures will need to be agreed with the relevant highway authorities. It is anticipated that roads would only be temporarily closed where this is required for safe working. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. The means of access will be communicated to the relevant Local Highway Authorities and emergency and essential services. Full road closures are expected to be for no more than four weeks. When considered in the context of other major infrastructure projects, the residual effects in terms of driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. A number of short-term, temporary road closures are proposed for the construction of crossover bellmouths around Feering. Information on the temporary closures in this area is displayed on 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036]. A summary of the proposed short-term, temporary road closures and diversions to the north of the Parish of Feering are as follows: • Temporary closure of Old Road: A diversion has been proposed via lines SMD-E-001, SMD-E-007 and SMD-E-009 on 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036], Plan D • Temporary closure of Coggeshall Road: A diversion has been proposed via lines SMD-E-009, SMD-E-013, SMD-E 017, SMD-E-019 and SMD-E-020 as shown on 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036], Plan D • Temporary closure of Skye Green Road: Diversion route via lines SMD-E-004, SMD-E-001 and SMD-E-007 as shown on 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036], Plan D.

²⁷ Department for Transport and Highways Agency (2009) *Traffic Signs Manual Chapter 8*

Topic	Comment	National Grid's response
N/A (Non-Specific)	We are also concerned about the long-term permanent effects and the disruption likely to occur during the construction phase.	7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within the Outline CoCP will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order (Revision C) within the final CoCP. The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for traffic impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post consent. Any operational effects are assessed in the submitted Environmental Statement (documents APP-123 to APP-287).

2.21 Finningham Parish Council

2.21.1 Table 2.21 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Finningham Parish Council [RR-1118]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.21 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	Finningham Parish Council objects strongly to the current proposals for overhead pylons close to the most beautiful parts of our tranquil parish, some of which will be sited adjacent to our Conservation Village and will therefore be visible to all parishioners going about their daily lives. As the village is in itself a conservation area the local authority has a statutory duty to ‘preserve or enhance the character of appearance of the area’, but this proposal by National Grid will be putting our Conservation status at risk. The visual impact of the pylons will have a huge bearing on the countryside surrounding the village	The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). The Applicant acknowledges that the settings of designated assets within Finningham Parish had the potential to fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]. However, in the case of Finningham Parish, the assessment concluded that the settings of all the designated heritage assets within Parish do not extend to the Order Limits. With regard to Finningham Conservation Area, the assessment concluded that the setting of the conservation area does not extend to the Order Limits due to its settlement focus, overall distance being almost 1 km to the west of the nearest pylon RG125, and screening by mature trees and hedges and the railway embankment in the intervening landscape (6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]). The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.

Topic	Comment	National Grid's response
		Effects on visual receptors within Finningham Parish are set out under Visual Receptor Area (VRA) B4 Finningham and Gislingham in paragraphs 13.5.37 to 13.5.48 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The assessment notes that views from within the settlement of Finningham would be largely screened by buildings and the effect would be minor and not significant within the settlement (paragraph 13.5.44). A photomontage from Historic Environment Viewpoint HE34: Finningham, Mid Suffolk represents views from the edge of Finningham (albeit in summer when vegetation is in full leaf), as shown on pages 68 to 70 of 7.12 Visualisations - Part 9 of 9 [APP-351]. More open views would be available to the south of the settlement as represented by Viewpoint 2.42: PRow south of Finningham (Finningham 16). A moderate and significant (adverse) effect would be experienced by visual receptors, as set out on page 52 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. A photomontage from Viewpoint 2.42 is provided on pages 27 to 31 of 7.12 Visualisations - Part 3 of 9 [APP-345].
Alternatives	And we seek to have the cables put underground until they pass Finningham.	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
Needs case	Finningham Parish Council also objects to the policy target of 2030 for decarbonising the grid as this does not allow time to implement other less invasive options. Whilst accepting the need to move power from the North Sea to London, Finningham Parish Council objects to the National Grid (NG) Norwich to Tilbury Pylon's proposal. This is based on the arguments set out by the 'Essex Suffolk Norfolk Pylons', an action group, whose submissions we fully endorse.	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the Great Britain energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on net zero delivery.
Consultation	Consultation has been and remains inadequate;	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Alternatives	valid alternatives with less negative impacts have not been addressed, presented and or considered. There are	The Applicant has carried out iterative rounds of pre-application consultation, as detailed in 5.1 Consultation Report [APP-066]. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation.

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	alternatives, which have been assessed in the ESO East Anglia Network Study, and in particular we would point out that Option 8: Onshore HVDC comes out very strongly relative to the Pylons (Option 3). In particular Option 8 is assessed as having: • superior environmental ranking to Option 3, with all other rankings equal (see Section 7 of ESO study). • Lower constraint costs than Option 3 in two of National Grid's Future Energy Scenarios (Table 6, ESO Study), and the overall lowest constraint costs averaged across all scenarios (£281m vs £600m for Option 3) We note that the NGET response to the ESO study dismisses the Community Sentiment aspect of the former as being "not part of the HND methodology" (P4). It is not acceptable to dismiss Community Sentiment in this way, especially when the ESO study shows all but one of the 9 options studied	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.

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	are superior to NGET's default Option 3 (which is rated red for Community in Section 7) in this respect.	
Transport and Traffic	TRAFFIC IMPACT: The Parish Council object to the amount of traffic including Heavy Goods Vehicles (HGVs) over a number of years that our Conservation Village and the inhabitants will be subjected to. The Conservation Area in Finningham was originally designated by East Suffolk County Council in 1973 and inherited by Mid Suffolk District Council at its inception in 1974. The Village is about 3 miles West of the main A140 road from Ipswich to Scole Turnpike Trust of 1711. The village is sandwiched between B1113 Finningham Road/B1113 Walsham Road, Wickham Road, and Eastlands Lane, all of which are potential access roads for the Pylon scheme. The Finningham/Walsham Road and Wickham Road are within the boundary of the Conservation area. The potential use of these roads by HGV's will increase the traffic	The Applicant has responded to previous queries with respect to the proposed construction access approach in the Finningham area under Table 4.26, Item IDs 12.92-12.97 within 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. In line with this position and the construction routeing strategy set out in Section 5.4 of the 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing the use of designated access routes for construction traffic termed 'Primary Access Routes' (PARs). The Applicant has identified a need for a PAR in the Finningham area to support construction of the Project proposals, and has undertaken an assessment which identified the proposed route through Finningham as the preferred option. This assessment included consideration of the length of potential access routes, associated traffic constraints, and the suitability of junctions with the Major Road Network and Strategic Road Network. In support of this assessment, site visits and Swept Path Analysis were undertaken. In support of this proposed PAR, a mitigation scheme for this route was also developed, as shown in Sheets 3 to 5 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section B [APP-314]. Where Swept Path Analysis indicated that the carriageway width was insufficient for two-way HGV traffic, widening of the existing highway has been proposed. For this PAR route, widening is proposed for a short section close to the junction with the A143, denoted as B1 within Sheet 3 of the Indicative Highway Mitigation Plan noted above. The Applicant has additionally completed junction modelling on those junctions identified as sensitive, based on existing congestion or potential capacity issues due to the increase in traffic during the worst-case construction period as set out in Section 6 and Section 7 of 7.11 Transport Assessment [APP-333]. The need to model the B1113 Walsham Road / Wickham Road junction (Site 20) was not identified after the preliminary junction assessment (details in 7.11 Transport Assessment - Appendix F - Junction Capacity Assessment [APP-339]). Therefore, no capacity issues have been identified at this junction as a result of the construction traffic.

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	massively. This area is currently a quiet low traffic environment route. The highlighted roads are extremely narrow, are without footpaths and pose a Health & Safety Risk to the already vulnerable pedestrians. The proposed routes have the potential to cause bottlenecks whilst large HGVs are trying to pass oncoming vehicles often wide loads from the neighbouring farms. The lack of egress risks damage to properties and private vehicles parked on the roadside.	The Applicant notes the concern for pedestrians using the routes proposed. The Applicant is proposing to develop a driver information pack, which will include locations where pedestrians and non-motorised users are anticipated to be on the highway, and any appropriate actions. Additional information is noted in 7.3 Outline Construction Traffic Management Plan (Revision B) Section 2.4 of the 7.3 Outline Construction Traffic Management Plan (Revision B) sets out how the Applicant is proposing to use the Permit Schemes in place and operated by the Local Highway Authorities to coordinate the street works required for the Project. The police, fire and ambulance services (referred to as 'blue light services') will be given written notice of any planned temporary lane or road closures. It is anticipated that the Main Works Contractor(s) will develop an Incident Management Plan in agreement with the blue light services to develop a procedure for any incidents on the road network proposed to be utilised by the Project.
Socio-economics, recreation and tourism	NG's initial data shows no fatal accidents and low levels of accidents to have occurred. This is due to the limited local traffic currently utilising the roads and the fact that the police only document road traffic accidents where an injury occurs. However, since the initial data was released there has tragically been one fatal accident. Should the traffic increase, the likelihood of more accidents and fatalities will be increased. The village is 18 miles to the closest accident	The Applicant notes Finningham Parish Council's concern regarding the fatality which occurred in January 2025 on Primary Access Route (PAR) 12 - B1113 Finningham Road just north of Back Street. This collision was not included within the assessment undertaken within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] as the latest available information prior to development consent application submission was taken from the Department for Transport website (data up to September 2024). A review of the latest three-year collision data between June 2022 to June 2025 confirms there is no collision cluster at this location. The fatality was the only recorded collision which involved a solo motorcyclist and did not involve any other vehicle or pedestrian/cyclists/horse rider. Therefore, the findings of the assessment on collisions and road safety reported within Section 16.7 in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] remain unchanged.

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	and emergency unit at West Suffolk hospital in Bury St Edmunds and would therefore place any injured person at risk from delays in hospital admission.	
Transport and Traffic	Finningham has experienced increasing traffic issues over the past years with the B1113 in particular being used as a short cut from the A140 at Stowmarket, this is exacerbated if the A14 is closed or has diversions for road works. The parish council is already concerned by the numbers of HGV's using this route so a 93% increase in HGV's on the B1113 due to National Grids plans, this is unacceptable.	In and around Finningham, prescribed Primary Access Routes (PARs) are proposed along the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13) and Eastlands Lane (PAR 14) from the A143, as displayed on page 10 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] sets out the net increase in construction traffic for the maximum peak day (AM and PM peak hours). A peak net increase of 26 HGV movements is proposed in the AM and PM peak hour along the B1113 Finningham Road/B1113 Walsham Road Wickham Road (PAR 12 and PAR 13), and 13 HGV movements are proposed on Eastlands Lane (PAR 14) in the AM and PM peak. This document also sets out the expected future baseline of each PAR and the percentage change associated with the increase in construction traffic. The baseline number of HGVs using this route along the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13), and Eastlands Lane (PAR 14) is very low so any increase in HGV movements during construction will show as a large proportional change in the assessment. Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] the assessment of driver and public transport passenger delay; pedestrian, cyclists and horse riding severance; amenity; and fear and intimidation found the residual construction effect would be temporary, and not significant when taking account of the mitigation measures set out in 7.3 Outline Construction Traffic Management Plan (Revision B). Highway mitigation measures have been proposed on the existing highway network to facilitate construction vehicle access to the construction corridor. Various highway mitigation measures are proposed for the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13) and Eastlands Lane (PAR 14), including vegetation removal, carriageway widening and appropriate traffic management. The proposed mitigation measures are displayed on Sheet 5 of 7.3 Outline Construction

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		Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section B [APP-314].
Transport and Traffic	The extra traffic will increase the potential for road surface damage and noise	The Applicant notes the concerns raised regarding road surface damage associated with construction traffic. As noted in Section 5.2 of 7.3 Outline Construction Traffic Management Plan (Revision B), pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken. The results of these pre-condition surveys will be shared with the Local Highway Authority prior to works commencing. This record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the precondition survey. There may be circumstances, such as those listed below, where traffic movements on the road network are compromised, impacting the use of the agreed Primary Access Routes and site access points. Heavy flooding would be considered as an incident on the highway network that disrupts the normal operation of the highway network or results in the closure of the highway network. In the event of any incident occurring which impacts on the safe and efficient operation of the road network, additional mitigation measures will be considered, which could include contingency routes. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant Local Highway Authorities and the police. With regard to noise please refer to the detailed response later in this table.
Transport and Traffic	No specific local studies have been submitted regarding the potential traffic noise levels that the inhabitants would be subjected to.	The assessment of Construction Traffic Noise can be found in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] . Aside from one property no significant noise effects have been predicted.
Water environment	The B1113 and Wickham Roads are prone to heavy flooding which could result in redirection of traffic down smaller lanes potentially causing further health and safety risks to the local people.	Management of access road crossings and flood risk effects (including on the B1113 and Wickham Road) would be mitigated through commitments W10–W15 within 7.2 Outline Code of Construction Practice (Revision C) , which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way would be managed through commitments AS03, S02, S03 and GG30 within 7.2 Outline Code of Construction Practice (Revision C) , which set out mitigation for providing for

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		maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads would be controlled through commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes within 7.2 Outline Code of Construction Practice (Revision C). The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).
Transport and Traffic	From NG's preliminary construction document, the data shows increase in HGV traffic by: • Walsham/Finningham Road (B1113) – 93% • Wickham Road – 128% • Eastlands Lane – 6308% This is wholly unacceptable for the residents of Finningham.	In and around Finningham, prescribed Primary Access Routes (PARs) are proposed along the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13) and Eastlands Lane (PAR 14) from the A143, as displayed on page 10 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] sets out the net increase in construction traffic for the maximum peak day (AM and PM peak hours). A peak net increase of 26 HGVs is proposed in the AM and PM peak hour along the B1113 Finningham Road/B1113 Walsham Road Wickham Road (PAR 12 and PAR 13), and 13 HGVs are proposed on Eastlands Lane (PAR 14) in the AM and PM peak. This document also sets out the expected future baseline of each PAR and the percentage change associated with the increase in construction traffic. The baseline number of HGVs using this route along the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13), and Eastlands Lane (PAR 14) is very low so any increase in HGV movements during construction will show as a large proportional change in the assessment. Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] the assessment of driver and public transport passenger delay; pedestrian, cyclists and horse riding severance; amenity; and fear and intimidation found the residual construction effect would be temporary, and not significant when taking account of the mitigation measures/commitments set out in the 7.2 Outline Code of Construction Practice (Revision C) and 7.3 Outline Construction Traffic Management Plan (Revision B).
Noise and Vibration	NOISE/WORKING IMPACT: The Parish Council also objects to the amount of noise that will	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].

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	be evident should the project go ahead. Finningham will be subject to and negatively affected by construction activity between Pylon RG122 – RG125 (east of Finningham). This construction activity will subject the usually quiet village to varying amounts of noise 24 hours per day from 24 decibels up to 110 decibels and whilst NG have averaged the amount of noise these averages are on separate activities such as road construction or removing topsoil.	The assessment considers the potential for multiple activities to occur simultaneously and includes other similar worst-case assumptions. For clarity, noise levels would not be 110 decibels at nearby receptors, and this is an incorrect interpretation of the plant noise data provided in 6.14.A1 Environmental Statement Appendix 14.1 – Construction Noise and Vibration Data [APP-257], which are source sound <u>power</u> levels and not receptor sound <u>pressure</u> levels. The assessment indicates that significant adverse effects from construction noise are not expected where appropriate mitigation measures are incorporated into the works. The Main Works Contractor(s) is committed to employing such measures as per the various commitments detailed in 7.2 Outline Code of Construction Practice (Revision C). Additionally, further detailed construction noise assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (which would be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Cumulative Effects	These activities will not occur in isolation and will be occurring in conjunction with many activities concurrently thus increasing the noise levels.	Inter-project and intra-project cumulative noise effects are assessed in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. No significant noise effects are anticipated in Finningham Parish.
Transport and Traffic	In addition, the proposed working hours are unacceptably long and include weekends and Bank Holidays	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: - Monday – Friday: 07:00 to 19:00 - Saturday, Sunday and Bank Holidays/Public Holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C) (draft DCO).

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		The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters; this includes the core working hours for the construction phase of the Project. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or Bank Holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set

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		out within 7.2 Outline CoCP [REP2-014] will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 draft DCO [REP2-004] within the final CoCP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of 7.2 Outline Code of Construction Practice (Revision C), including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).
Landscape and visual	as the nights draw in, flood lights will be needed to light the construction which will visually impact our dark night skies dark night skies with light pollution.	The visual assessment in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232] notes that construction activity may include lighting in the hours of darkness where it is judged that lighting would be perceptible. This was taken into consideration in the assessment of effects during construction. Effects during construction would be temporary in nature.
Health and Wellbeing	HEALTH IMPACT: There are further associated risks to the local people through the well-researched Electromagnetic field radiation (EMF) which has been linked to differing health issues in both humans and animals including cancer, neurological disorders, infertility, sleep disturbance, depression as well as interference with medical implant devices. Whilst there are guidelines suggesting distances there is no universally safe distance that	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing electric and magnetic fields (EMFs), which are incorporated into the decision-making process for development consent in National Policy Statement (NPS) EN-5 (2024). These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMFs and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in the 7.8 Electric and Magnetic Field Compliance Report [APP-330] .

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	exists or how long-term exposure may affect health.	
Historic Environment	VISUAL IMPACT: The visual impact of these 50-meter-high pylons and their associated structures such as compounds, access tracks and storage areas are unacceptable. The pylons will be overlooking/overshadowing a Conservation area that has a number of historic grade two and grade two and grade two * buildings within eight hundred metres. These include Church Farm, a grade two * listed building, Church Barn, and The Old Bakery.	The Applicant acknowledges that the settings of designated assets within Finningham Parish had the potential to fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209] . However, in the case of Finningham Parish, the assessment concluded that the settings of all the designated heritage assets within the Parish do not extend to the Order Limits. With regard to Finningham Conservation Area, the assessment concluded that the setting of the conservation area does not extend to the Order Limits due to its settlement focus, overall distance being almost 1 km to the west of the nearest pylon RG125, and screening by mature trees and hedges and the railway embankment in the intervening landscape (6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]). This is illustrated by viewpoint HE34 in 7.12 Visualisations - Part 9 of 9 [APP-351] .
Landscape and Visual	The valued open unobstructed views across the sweeping hinterland landscape would be visible in some medium and long-distance views from the local road and parts of the south of Finningham.	Effects on visual receptors within Finningham Parish are considered in the first row of this table; please refer above.
Historic Environment	The Finningham Conservation Appraisal 2009 states that the village 'suffers from a surfeit of overhead wiring which is intrusive, and the undergrounding of these supply lines would greatly improve the	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons

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	appearance'. The impact of Pylon blighted landscape would indeed be intrusive and should at least be placed underground.	are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant acknowledges that the settings of designated assets within Finningham Parish had the potential to fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]. However, in the case of Finningham Parish, the assessment concluded that the settings of all the designated heritage assets within the Parish do not extend to the Order Limits. With regard to Finningham Conservation Area, the assessment concluded that the setting of the conservation area does not extend to the Order Limits due to its settlement focus, overall distance being almost 1 km to the west of the nearest pylon RG125, and screening by mature trees and hedges and the railway embankment in the intervening landscape (6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]).
Biodiversity, ecology and nature conservation	ENVIRONMENT, HABITAT, SPECIES: The construction activity between RG121 – RG125 will result in the loss of hedgerows and trees which will have a significant impact on the local wildlife. These Pylons the associated compounds, structures and roads will only further affect and impede the movement of the abundant and various wildlife that live in the area. The powerlines will pass through natural habitats which will disrupt wildlife migration patterns, disturb ecosystems and pose risks to bird populations due to decimation of the hedgerows as well as potential collisions with the	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as irreplaceable habitats, ecological connectivity/wildlife corridors and protected species. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period including badgers, birds, dormouse, water vole and invertebrates. The findings of these informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitments. Collision risk has been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] with survey results provided in 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-

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	lines. In the village we currently enjoy Roe deer, Muntjacs, Hares, Badgers, and many other wildlife species living freely and safely including the rare grey grouse, breeding birds, Hazel door mice, Water voles, Stag beetles, Great Crested newts and Hedgehogs. In our environment we are trying to reclaim wildlife and biodiversity, not build infrastructure that may cause harm to them.	167 to APP-170]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list; guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records have been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern.
Biodiversity, ecology and nature conservation / Transport and Traffic	There are also many roosting bats within the mature trees and in the local buildings surrounding the proposed route. In 2002 Tree Preservation Order (TPO) number 295 was made to protect a group of Yew and Oak trees around the Old Rectory, adjoining the Conservation Area. Further north two Oaks and a Lime tree were in 2005 protected by TPO no. 337 at the Old School on Walsham Road. Most recently in 2007 an Ash and a Lime were given the protection of	Requests for information were made to the relevant Local Planning Authorities; information received has been included in 2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]. The impacts of air pollution from the temporary construction traffic passing through Finningham on trees protected under TPOs were not assessed, as TPOs are not listed as designated sites in the IAQM ecological assessment guidance²⁸. No designated ecological habitats are located in Finningham therefore no assessment has been made of impacts on trees there. More broadly the impacts of construction traffic emissions on relevant designated ecological habitats are shown in 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] and summarised in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]. The assessment concluded there would be no significant effect on ecological receptors from changes in air quality. The construction routing strategy is set out in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). This details how construction traffic will use the Strategic and Major Road Networks to access the region and will then be routed along

²⁸ IAQM (2020) *A guide to the assessment of air quality impacts on designated nature conservation sites*

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	TPO no. 368 on another site adjoining the Conservation Area. It is known that air pollution from increased traffic can cause substantial damage to trees resulting in declines in growth and survival. Nitrogen and Sulphur deposition can also lead to increased tree growth, which can actually harm trees. The large amount of HGVs accessing the narrow road system and lanes will inevitably mean that as vehicles try to pass one another damage will be sustained to the green verges which are so prevalent in the area, that will destroy and damage the wildlife flora and fauna. The UK government has made a commitment under the G7 Nature compact biodiversity and sustainability agreement to 'support and drive the protection, conservation and restoration of the ecosystems critical to halt and reverse biodiversity loss and tackle climate change, such as supporting the target to conserve or protect at least 30% of global land'.	Primary Access Routes (PARs) to the site access points. From the site access points, traffic will be routed off the public highway along haul roads to access the construction sites. In and around Finningham, prescribed PARs are proposed along the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13) and Eastlands Lane (PAR 14) from the A143. Highway mitigation measures have been proposed on the existing highway network to facilitate construction vehicle access to the construction corridor. Various highway mitigation measures are proposed for the B1113 Finningham Road/B1113 Walsham Road (PAR 12), Wickham Road (PAR 13) and Eastlands Lane (PAR 14), including vegetation removal, carriageway widening and appropriate traffic management. The proposed mitigation measures are displayed on Sheet 5 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section B [APP-314]. 7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in Outline CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in Outline CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction.

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	Finningham Parish Council upholds the values behind this statement.	
Historic Environment	HERITAGE: Substantial harm is predicted to be caused to the heritage assets in the conservation area. The local residents want to safeguard their precious heritage assets. The community views the damage that will be caused by unsightly structures and increased traffic risks as a threat to their village way of life. The siting of the proposed pylons so close to a village with a large conservation area and many listed buildings is bound to have a huge effect on the setting of the twenty-seven assets. Of the twenty-seven listings two thirds are within the Conservation area. Most are timber framed and plastered with roofs of thatch or pantiles. Those assets which would directly overlook the Pylons, include Grade two * listed Church Farmhouse which was originally an open hall house dating from the late 15th century and Grade two listed	The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). Potential impacts have been considered in relation to community wellbeing, particularly in relation to environmental change and how the Project could alter feelings of control over the physical environment, including reduced feelings of attachment to, and pride in, a place. These impacts are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This includes an assessment of mental health and wellbeing impacts associated with loss of visual amenity which draws on findings set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), which contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. No properties within Finningham meet the thresholds for inclusion in the RVAA. It is acknowledged that there are likely to be individuals within Finningham Parish who experience adverse mental health and wellbeing impacts associated with visual change; however, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. The Applicant acknowledges that the settings of designated assets within Finningham Parish had the potential to fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]. However, in the case of Finningham Parish, the assessment concluded that the settings of all the designated heritage assets within the Parish do not extend to the Order Limits. With regard to Finningham Conservation Area, the assessment concluded that the setting of the conservation area does not extend to the Order Limits due to its settlement focus, overall distance being almost 1 km to the west of the nearest pylon RG125, and screening by mature trees and hedges and the railway embankment in the intervening landscape (6.11.A1 Environmental Statement

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	Church Farm Barn dated to the 19th Century.	Appendix 11.1 – Historic Environment Baseline Report [APP-209]). With regard to Church Farmhouse the assessment concluded that the setting of the asset does not extend to the Order Limits due to its settlement and immediate agricultural land focus, overall distance being almost 1 km to the west of the nearest pylon RG125, and screening by mature trees and hedges and the railway embankment in the intervening landscape (6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]).
Historic Environment	The Suffolk County sites and movements records list over a dozen finds of archaeological interests from various periods in the Finningham Parish., including near to Church Farm a Neolithic polished flint axe along with a quantity of medieval pottery, a coin and a pilgrim's badge.	The Applicant has assessed the archaeological potential of the Project within Finningham Parish and has identified findspots within the Order Limits representing part of an Anglo-Saxon brooch, an Iron Age coin, two medieval coins, and a fragment of a Romano-British bracelet/armlet as well as several more findspots in the study area (6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [APP-209]). Much of the land within the Order Limits has been geophysically surveyed with largely negative results, indicating the above finds represent stray losses rather than being indicative of sedentary activity (report forthcoming). A programme of archaeological trial trenching is planned to further assess the land within the Order Limits. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeological remains within Finningham Parish. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Socio-economics Recreation and Tourism	Many visitors enjoy a historic trail around the village to view these houses, so pylons on our doorstep would impact on local tourism and the benefits of visitors spending power.	Socio-economic impacts on the tourism economy and businesses are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The chapter concludes that there would be no significant effects on the tourism economy in the Wider Study Area or business receptors within Finningham Parish Council as a result of the Project. In addition to the Environmental Statement, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The government has

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		published its guidance on community funds for transmission infrastructure²⁹. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the Environmental Impact Assessment.
Noise and Vibration	The twenty-seven Heritage structures would be substantially harmed from the direct traffic vibration as vibration is one of the main factors for fatigue in structures. Long term contact with vibrations can cause damage in buildings, minor effects such as cracks can evolve over time causing critical issues which may result in collapse especially in historic buildings. The residents would be subject to substantial financial implications alongside the risk of prosecution should they fail to repair any damage to the historic buildings. The proposed number of HGVs	An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is so that potential 'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than a day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or potential structural damage, can be avoided with the use of best practicable means (BPM). This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and

²⁹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

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	would result in unbearable vibrations for many householders residing in the village as there are numerous properties along the proposed roads to be utilized.	incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order application (7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post- condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Landscape and Visual	LANDSCAPE: Finningham sits in a slight valley either side of a tributary of the River Dove that flows north eastwards via Eye to join the River Waveney at the Norfolk border. The village is situated on the 'High Suffolk' claylands, deposited on the Ice Ages over the chalk that underlies most of the county. This makes the area good for arable farming, because the clay binds the soil together and makes it less prone to erosion. Currently there are open views of arable land with small clusters of trees and houses appearing on the horizon. The proposed pylons would overwhelm the landscape with their position and scale ruining the unique vista across the open field from the conservation village.	Effects on visual receptors within Finningham Parish are considered in the first row of this table; please refer above.

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Land and Property	PROXIMITY TO HOUSES AND BUSINESSES: The proximity to the village as a whole is unprecedented and will affect every single house and resident due to the sheer size and location of the proposed pylons as well as the massive increase in associated traffic, particularly HGV's. Consequently, properties near power lines will experience decreased desirability and lower property values. The presence of power lines near residential areas will create negative perceptions or stigmas about the village's desirability. Studies show that pylons can reduce house prices by at least 20% and reduce the desirability of a property for sale.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaully-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: - House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaully-Denny power line. - Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Noise and Vibration	The power lines will emit a low-level humming especially during periods of high electricity demand which will be a constant annoyance for those closer to the installation	Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the Environmental Statement (Volume 6 of the Development Consent Order application), in accordance with 6.20 Scoping Opinion

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		[APP-297], on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261] which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons – GG13 of 7.2 Outline Code of Construction Practice (Revision C) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions.
Health and Wellbeing	The power lines will generate electromagnetic interference with might impact nearby electronic devices and sensitive equipment.	Radiofrequency emissions can interfere with electrical equipment, telecommunication, Wi-Fi and broadcast equipment. As detailed in Section 3.1 of 7.8 Electric and Magnetic Field Compliance Report [APP-330], these emissions are limited from overhead lines by design as set out in the Applicant's Technical Specifications, including TS1 Ratings and general requirements for plant, equipment and apparatus for the National Grid system, TS2.04 Generic design principles for overhead line and TS3.04.36 Insulator and insulator sets for overhead lines, which include the requirements of British Standards minimising the generation of radio interference. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines, which cause no interference issues for electrical equipment, telecommunication, Wi-Fi and broadcast equipment under normal operating conditions. Therefore, we also expect no interference issues as a result of the Project. Global Positioning Systems (GPS) are increasingly being used to provide accurate position information such as in precision farming. It uses a radio receiver to receive the transmitted radio signals from a number of satellites orbiting the Earth. Additional accuracy is used in differential GPS (DGPS) which involves the use of signals transmitted from a local fixed transmitter (or another satellite). Close to a pylon, there

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		might be some degradation in GPS performance, just as there can be some degradation close to buildings and trees. The thickness of individual wires means that they do not cause a problem. Any radio interference emitted by the line is too small to have any effect. Other than that, there is no evidence of power lines interfering with GPS used in precision farming.
Transport and Traffic	PUBLIC RIGHTS OF WAY: There are eight designated footpath walks around the village which will be impacted by this development, particularly Byway 22, Bridle path 12 and footpath 11 which are likely to be unusable due to the working around the Eastlands Lane area.	The Applicant notes the concern regarding Public Rights of Way (PRoWs) in the vicinity of Finningham and the Eastlands Lane area. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the PRoWs listed, the Applicant confirms that they are those within the Order Limits. However, whilst Byway 22 (W-246/022/0) and Bridleway 12 (W-246/012/0) enter the Order Limits, they are not directly affected by the construction of the Project and will therefore remain open on their existing alignment. Footpath 11 (W-246/011/0) will have a short 'Temporary Closure (Managed)' section north of Wickham Road, meaning it will remain accessible throughout construction on its existing alignment under a managed access regime. This is associated with overhead conductor stringing and may include brief holding of users until specific construction activity is paused to allow safe passage. To the south of Wickham Road Footpath 11 (W-246/011/0) will be subject to temporary diversion, initially eastwards along the southern verge of Wickham Road and then southwards to Wickham Lane as per the existing PRoW. Separately, at Eastlands Lane, a temporary non-motorised user route will be provided alongside and to the west of the temporary highway widening, ensuring continued safe access for users during construction. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan.

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		All PRowS temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. An assessment of the residual effects on delay to users of PRowS within Finningham Parish can be found within in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Where temporary closures with diversions are proposed an assessment of residual effects on delay is presented within Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that no significant impact of delay to PRow users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied.
Planning Policy	BREACHES OF HOLFORD RULES: We believe there are several breaches in the guidelines on overhead line routing, first formulated in 1959 by Sir William later Lord Holford, who was a part-time member of the CEGB. They are known as the 'Holford Rules.' National Grid continues to employ them as a basis of the company's approach to overhead line routing. Rule 2: Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e., the more massive structures which are used when lines change direction. Where possible choose routes which	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4s and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken, which is not the same as not considering the Holford Rules.

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	minimise the effects on the setting of areas of architectural, historic, and archaeological interest including Conservation Areas, Listed Buildings.; - Finningham is in a Conservation Area. Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.: - The route will site 50-metre-high pylons which cut through and tower over a swathe of bushes and trees at Eastlands Lane so clearly visible for many miles around against a large sky background. Rule 5: Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees: - The ruling states Where possible avoiding cutting extensive swathes through woodland	

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	blocks and consider opportunities for skirting edges of copses and woods. Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape: – the route cuts through a beautiful, wooded area at Eastlands lane.	
Consultation	CONSULTATION Finningham Parish Council does not consider it has been consulted in a way that is open, fair or transparent. Finningham Parish Council has identified the following deficiencies in National Grid's consultation process: • Consultation meetings have all been timed for during the working day, denying working people the chance to have their say. There has only been one meeting in Gislingham, timed 1pm-6pm. The meetings were felt by members of the public not real consultation more paying lip service to a process.	The Applicant does not agree that consultation has been undertaken in a way that is not open, fair or transparent. The Applicant carried out consultation in accordance with the Planning Act 2008, relevant guidance, and established best practice, and has sought to provide a range of opportunities for communities, stakeholders and Parish Councils to engage with the proposals and provide feedback. The Applicant recognises concerns regarding the timing of consultation events. Events were scheduled across a range of dates and durations to balance venue availability, staffing requirements and accessibility, including extended opening hours to allow attendance outside standard working times. Events were also held on a number of weekend dates and alternative forms of engagement were available, including webinars and a hotline, email and freepost address through which contact could be made and questions could be asked. The Applicant does not accept that consultation events were not designed to help answer questions. Events were designed to provide information, explain the proposals, and enable attendees to ask questions and submit feedback. All feedback received formed part of the consultation record and was considered in detail. The Applicant sought to select venues that were appropriate for the size and format of events and reasonably accessible to the communities affected. All the venues were accessible by public transport but alternative means of engagement, including online materials and webinars, were also made available should access to events be restricted in any way. The Applicant does not agree that consultation took place after decisions were made. Routeing and design options have been subject to ongoing technical, environmental and

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	• The Public Consultation/Information Events have been held in locations inaccessible by public transport. • Finningham Parish Council and its residents were not consulted when the proposals were at a formative stage. The route was predetermined. The decision for pylons was also predetermined. This is against the Gunning Principles. • Information on the proposals has been inaccessible to many people. • The maps sent to householders are large scale area maps, generic and lacking in detail. • Information has only been sent to householders within 1km of the pylon line when the visual impacts of the project are far wider. • The interactive online map does not show homes other than listed buildings.	stakeholder assessment, and consultation has been undertaken to inform that process. While certain engineering and policy constraints apply to nationally significant infrastructure, consultation has been undertaken at a formative stage and was carried out in-line with the Planning Act 2008 and therefore considered in line with the Gunning Principles. The Applicant has sought to make information accessible through a range of formats, including public events, printed materials, a Project website and a dedicated enquiries process. The Applicant recognises that different audiences have different needs and was able to respond to requests for information in different formats (such as large print) at each stage of consultation. The maps distributed were intended to provide an overview of the proposals at an appropriate scale for general circulation. More detailed mapping has been made available at consultation events, online and on request. The Applicant wrote to properties within a 1 km consultation zone – more than 81,000 properties in total – but advertised more widely including writing to host and neighbouring parish councils and via social media. This was set out within the Statement of Community Consultation and deemed proportionate through consultation with Local Authorities. The interactive map showed a range of 'layers' which could be toggled on and off; this included heritage assets such as listed buildings. If users want to view individual properties, the map could be viewed as a 'satellite' image, which shows homes and properties in more detail. The Applicant recognises that not all individuals have easy access to the internet. For this reason, non-digital consultation methods have been provided, including printed materials, staffed events, and the ability to request information by post or telephone. The Applicant does not accept that information has been deliberately obscured. Supporting documents have been made available in line with standard practice for projects of this nature. The Applicant has provided high-level information on construction activity, including traffic, appropriate to the stage of development at statutory consultation. The Applicant has sought to present information in a clear and accessible manner, recognising the complexity of a Nationally Significant Infrastructure Project. Materials varied from public facing documentation, such as the community newsletter and Project background document, to more technical information, such as the Preliminary Environmental Information Report. If stakeholders or the public needed more information

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	- Internet access is required to fully access the proposals and their supporting information - The supporting documents on National Grids website are not labelled or indexed in a way that makes them straightforward to access. Information is being deliberately obscured. - National Grid has failed in making residents aware of the increased traffic requirements to build the infrastructure. - National Grid has failed to make the information available and user friendly for the residents. - Staff at the consultation/information events have not had the necessary knowledge to respond to queries. Parishioners report that staff have avoided responding to pertinent questions. - There has been no personal engagement with homeowners who are adversely affected.	or information that needed clarification, contact channels were available for people to ask questions. The Applicant provided trained staff at consultation events to explain the proposals and answer questions. The Applicant does not accept that staff avoided responding to questions; where information was not available, queries were logged and could be followed-up. The Applicant recognises the importance of engagement with those most directly affected. Opportunities for one-to-one engagement have been, and will continue to be, made available, including through written correspondence and dedicated points of contact. The Applicant acknowledges concerns that feedback has not been addressed. All feedback received is logged, reviewed and used to inform ongoing design development. Consultation reports published following each stage of consultation and a further report submitted as part of the Development Consent Order (DCO) application (5.1 Consultation Report [APP-066]) contain all the feedback received and how it has been considered. The assessment of impacts on property values is not a material planning consideration within the DCO process. On health and well-being, the Applicant has undertaken environmental assessment in accordance with legislative requirements, including consideration of potential effects on communities. Health-related matters have been considered where relevant within the Environmental Statement. Regarding conservation areas, the Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). Waveney Valley alternatives were consulted on during statutory consultation in 2024, the outcomes of which were communicated to the public in January 2025 following further technical appraisal. The purpose of the targeted consultations held in spring 2025 was to share proposals for a series of small changes along the route.

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	• Homeowners do not feel the issues they have raised in feedback to previous consultations have been addressed. Homeowners seek personal engagement given the life changing impact of these proposals • The impact of the proposals on property prices has not been assessed. This is an important omission in the process • National Grid has made no attempt to assess the impact of the proposals on health and mental health/wellbeing. This is an important omission in the process • National Grid do not appear to have recognised that Finningham is in a conservation area and should require special consideration in order to protect the local assets. • National Grid has failed to give residents any faith in the process – most have been left with the impression that their views will be ignored, and that the	

Topic	Comment	National Grid's response
	outcome is a foregone conclusion. During the January-March 2025 targeted consultations, the decision taken by National Grid to renege on their Waveney Valley Alternative proposals, was not included for public consultation.	
Needs Case	MITIGATION Whilst having made very clear our disapproval of NG's consultation processes to date and of the proposed scheme as currently proposed, in the event that the N2T project gains approval, we seek the following mitigations: [...]We also note that undergrounding is, according to the ESO report, subject only to moving the date within NG contract (to take electricity from the yet to be agreed / approved pylons) from 2030 to 2034 / 2035. Full, detailed and level playing field cost comparisons have not been undertaken by NG, in particular offshoring and	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks³⁰ and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis³¹, Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.

³⁰ Andy Hiorns (2023) *East Anglia Transmission Network Reinforcements*

³¹ National Energy System Operator (NESO) (2024) *Clean Power 2030 Annex 2: Networks, connections and network access analysis*

Topic	Comment	National Grid's response
	undergrounding. We refer again to the ESO report Option 8, which states it would be a valid choice if the date was extended to 2034. (The Hiorns Report makes clear 2034 gives plenty of time to meet the future demand if the process is extended to 2034). We believe National Grid must take mitigation action to reduce the impact of Construction traffic to the proposed routes given Finningham's conservation village status. This will impact heavily on the village and must be considered.	
Alternatives	[...] The Waveney Valley Alternative which proposes underground cables passing Worham Ling, and then emerging near Millway Lane to be reinstated. We believe the undergrounding should continue until underground cables pass Finningham to Mendlesham Road (Pylon RG133). This would continue the Waveney Valley Alternative to ensure the surrounding landscapes are less affected.	Regarding the Waveney Valley Alternative, considering feedback from the 2024 statutory consultation and refinement of the overhead line design, it was concluded that a solution that includes the use of underground cable would not be acceptable. It is acknowledged that there would be effects arising from overhead line infrastructure, but the level of such effects is not considered to meet the requirements set out at paragraphs 2.9.23 to 2.9.25 of National Policy Statement (NPS) EN-5 (2024) in this area, which is not subject to a National Landscape designation. Additionally different undergrounding methods may either give rise to a high level of impact on trees, high organic matter soils or the Waveney and Little Ouse Landscape Recovery (WaLOR) scheme; present unacceptable risks to cable integrity; or are at a level of cost inconsistent with National Grid's duties under the Electricity Act 1989 and relevant planning policy (i.e. NPS EN-5 (2024)). It was therefore concluded that an overhead line is the most appropriate solution for this section, with the final arrangement including one less pylon and a modified alignment compared with that presented at the statutory consultation. Section 4.6 of the 5.15 Design Development Report [APP-122] provides further detail in relation to the decision making around the mitigation embedded

Topic	Comment	National Grid's response
		into the design of the Project in this locality which includes realignment and repositioning of a pylon to reduce interaction with the WaLOR scheme, a landscape recovery scheme which is located in the same geographic area, and the removal of one pylon.
N/A	Representation Finningham Parish Council strongly objects to the Norwich to Tilbury pylon proposal due to its detrimental impact on our landscape, heritage, and community wellbeing. [...] We do not oppose energy security or the need for grid upgrades. However, pylons are the wrong answer National Grid has presented this proposal as a fait accompli, with poor and biased engagement that failed to meaningfully consult affected communities. The assertion that “there is no alternative” is misleading and dismissive of independent assessments showing that offshore HVDC transmission would be more cost-effective and significantly less intrusive. We therefore call on National Grid to pause the project immediately and undertake a full, transparent reassessment of all viable alternatives, including offshore and	The Applicant acknowledges the summary conclusions of the Finningham Parish Council RR and has responded to points of detail as above.

Topic	Comment	National Grid's response
	underground options. We urge the Planning Inspectorate to ensure genuine public engagement and to uphold the integrity of the planning process.	
Landscape and Visual	[...] The proposed infrastructure would industrialise rural Suffolk, eroding the character of our countryside and undermining the tranquillity valued by residents and visitors alike.	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment (LVIA) Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be significant effects on landscape character and visual amenity as reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors within Finningham Parish are set out in paragraphs 13.3.242 to 13.3.256 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under the Plateau Claylands Landscape Character Type.

2.22 Fordham Parish Council (Essex)

2.22.1 Table 2.22 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Fordham Parish Council (Essex) **[RR-1137]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.22 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Consultation	Fordham Parish Council objects to the National Grid (N.G.) Norwich to Tilbury pylons proposal. This is on the basis of the arguments set out in our consultation responses in 2022 and 2023 by Fordham Parish Council, with contributions from Fordham Local History Society, Colchester Archaeological Group and the Essex Suffolk Norfolk Pylons action group. In addition, multiple feedback forms and in particular the heritage form have all been previously returned with absolutely no response from N.G. The consultation process has been, and remains inadequate; the fact is that at no point have we been actually consulted. We have been presented with one option only and despite our direct phone call, presentations and	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .

Topic	Comment	National Grid's response
	evidence there have been no changes made to mitigate the damage to our parish.	
Alternatives	The only option that can fully protect our environment, heritage, economy and well-being is the offshore route for the power lines <i>[Applicant Note: this statement is repeated several times in the RR and therefore not duplicated throughout this response]</i> .	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Socio-economics, Recreation and Tourism	Local businesses have seen a major boost in tourism in the last few years, we get numerous groups of walkers and cyclists travelling the Essex Way, the linking public rights of way and country lanes, this vital part of the village's economy will severely be curtailed during the pylon construction process.	Socio-economic impacts/effects on the tourism economy and recreational routes (including the Essex Way) are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be no significant effects on the tourism economy within the Wider Study Area or recreational routes within Fordham Parish Council as a result of the Project. The Applicant is committed to providing a coordinated local and regional approach to community benefits. The government has published its guidance on community funds for transmission infrastructure. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance³². Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the Environmental Impact Assessment.

³² Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
Land Use	The economic and logistical effects on two of our farmers will also be considerable, on top of the long term damage to multiple fields and hedgerows; Fossetts Lane provides links to many of the fields in the east of the parish. The proposed haul roads and working areas will cause massive disruption to the farming calendar.	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes the results of the hedgerow surveys undertaken over 2022–2025 and an assessment of impact as a result of the Project. This hedgerow impact assessment is based on a reasonable worst-case scenario of hedgerow loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of hedgerow loss would be reduced and impacts to hedgerows would be minimised as far as practicable including around Fordham. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain, which includes hedgerows, with wider environmental and societal benefits on all construction projects. The 10% Biodiversity Net Gain (BNG) target for the Project is currently voluntary and aligned with our corporate sustainability commitment. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Fordham Parish (predominantly Grade 3a with small extent of Grade 2). During the construction phase, there would be areas of agricultural land that are temporarily disrupted; however, the Applicant would only use land required for the Project and would seek to minimise disruption to farming practices where reasonably practicable and safe to do so. Good practice mitigation measures are set out in 7.2 Outline Code of Construction Practice (Revision C), including maintaining or providing alternative access arrangements, protecting soil resources through appropriate handling, storage and reinstatement, reinstating affected field drainage systems, and communicating with landowners and occupiers to support the continuation of farming operations. All land required temporarily would be reinstated to its previous condition, or as otherwise agreed with the landowner. Where construction activities result in disturbance or loss affecting

Topic	Comment	National Grid's response
		farming operations, landowners and occupiers are entitled to claim compensation in accordance with the statutory compensation code, with disturbance and loss of income considered on a case-by-case basis. Ongoing engagement with affected landowners will continue to ensure holding-specific constraints and operational requirements are understood and appropriately managed. Soil management measures to be implemented during construction across the Project, including across Fordham Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its ALC grade, or as agreed with the landowner.
Landscape and Visual	While the bulk of the destruction to our landscape and farmland is on the east of the parish, some distance from most of the housing, the proposed pylons will still be very visible to those living along Mill Road, Fossetts Lane, West Bergholt Road and Church Road, completely fringing the eastern horizon of the parish.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised by Fordham Parish Council. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Fordham Parish are set out under Visual Receptor Areas (VRAs) D5 Fordham in paragraphs 13.7.52 to 13.7.63 and D6 West Bergholt, Fordham Heath and Eight Ash Green in paragraphs 13.7.64 to 13.7.75 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. This states that within 0.5 km of the Project, including views from Mill Road, Fossetts Lane and Church Road, there would be significant (adverse) effects.

Topic	Comment	National Grid's response
		As set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] effects at Viewpoint 4.08 Fordham (located on a Public Right of Way (PRoW) off Church Road) are judged to be moderate and significant (adverse), and effects at Viewpoint 4.25 Essex Way, Mill Road south of Fordham are judged to be major and significant (adverse), during construction and operation. It is recognised that the Project would affect views from properties within the Fordham area, and impacts on residential visual amenity have been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] to determine whether there are likely to be any instances where the impacts to residential visual amenity would be so great that the Residential Visual Amenity Threshold (RVAT), as described in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment³³, may be breached. The study area for this assessment includes properties which fall within 200 m of the centreline of the Project. Properties within Fordham which have been assessed comprise 1, 2 and 3 Hall Cottages, Mill Road and Hill Cottage, Fossetts Lane. A high magnitude of visual change is expected to views from 1, 2 and 3 Hall Cottages, and for Hill Cottage; however, when considered in the round, no breaches of the RVAT are anticipated in these locations.
Historic Environment	Apart from being an area of great natural beauty, this is also an area of highly significant archaeological heritage. As N.G. have been repeatedly told, but were still apparently unaware of at the most recent 2024 statutory consultations, we have multiple, confirmed prehistoric, Roman and medieval sites. Even our nationally important, active Roman dig site has not been avoided; N.G. plans to put	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on archaeological remains within Fordham Parish. A comprehensive desk-based assessment and walkover have been undertaken (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]), along with archaeological evaluation (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 to AS-076], 6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078], 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). This has identified archaeological sites, both scheduled and non-designated, along the proposed route. Where sites of archaeological significance were identified within Fordham Parish, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant will ensure that any residual impacts are minimised and that appropriate mitigation measures are in place.

³³ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

Topic	Comment	National Grid's response
	a pylon overhead line pulling location on top of it.	7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeological remains within Fordham Parish. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. With regard to the active Romano-British excavation site, the Applicant is aware of the asset and has moved pylon TB47 to the north-east as a result. Geophysical survey of the field in question as well as those to the north-east and the south-west indicates that the pylon bases are in 'blank areas' of the site. The pylon bases will be further investigated through archaeological trial trenching with the result made available to the council's local planning archaeologist. With regard to the pulling location, pulling locations across the Project do not require topsoil removal or any other form of ground reduction. The pulling locations will be matted prior to use to avoid damaging the topsoil and, thereby, any archaeological remains beneath. Should the archaeological trial trenching identify significant archaeological remains, the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for such. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Planning policy	This is a direct breach of the Holford Rules that N.G. are required to adhere to.	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the

Topic	Comment	National Grid's response
		balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
Landscape and Visual	As regards pylon placement, when you cross the river, passing the old mill house, proceeding up the hill towards the medieval church and Fordham hall, there will be a 50 metre/164 foot pylon within a few metres of the road, looming over you. This is exceptionally poor and thoughtless planning. Likewise, as walkers of the future travel the Essex Way beside the River Colne, looking north towards the village, the scene will be destroyed by the string of pylons planted in front of them. In addition, there is a "proposed overhead line pulling location" just 200 metres from our primary school with a pylon in the middle of it.	Effects on visual receptors within Fordham Parish are set out under Visual Receptor Areas (VRAs) D5 Fordham in paragraphs 13.7.52 to 13.7.63 and D6 West Bergholt, Fordham Heath and Eight Ash Green in paragraphs 13.7.64 to 13.7.75 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Viewpoint 4.25 Essex Way, Mill Road south of Fordham captures the view by Mill House on Mill Road, just after crossing the River Colne when travelling towards Fordham. The assessment is provided on page 70 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] and a visualisation is provided in pages 52 to 58 of 7.12 Visualisations - Part 5 of 9 [APP-347]. A sequential visual assessment was undertaken for long distance paths including the Essex Way, as set out in paragraphs 13.12.84 to 13.12.121 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Views from the Essex Way looking north towards Fordham are captured by Viewpoint 4.25 Essex Way, Mill Road south of Fordham as described above. An assessment of the community facility, including education premises, has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant effects have been identified for community facilities within Fordham Parish Council. The Applicant has reviewed the assessment of All Saints' Parish Church, Fordham in light of the respondent's comments. The Church is located close to the southern edge of Fordham on the western flank of Church Road. The grounds of the comparatively small parish church contain occasional mature trees, and the eastern flank of Church Road is lined with two-storey residential properties with attendant mature hedgerows and trees. To the immediate south is Fordham Hall and associated farm complex, whilst to the north is a moderately sized 20th century residential housing estate. On the northbound

Topic	Comment	National Grid's response
		approach to the church along Mill Road/Church Road and to the south of where the Project oversails the road, the church is not visible. This is due to mature hedgerows and tree cover in the intervening landscape as well as the local topography falling away to the south. Moving northwards the church is not visible until the southern edge of the village is reached. On the southbound approach to the church along Church Road, the asset is not visible until the viewer is within approximately 300 m. The view south along Church Road from this point will include the church roof and tower to the left and likely pylons off to the left of the vista at a distance of c.700 m. The visibility of the Project will be restricted, however, by mature hedgerows and a copse in the intervening landscape, as well as the topography falling away to the south. The westbound approach to the church along Fossetts Lane does not offer a view of any part of the asset until the viewer reaches the intersection of Fossetts Lane and Church Road. There are no views of the asset from Fossetts Lane that will include the Project in the intervening landscape. This indicates that the church, whilst being a focus for the village, is not a dominant feature of the wider landscape. The Applicant, therefore, considers the assessment undertaken within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], which concluded that the asset's setting does not extend to the Order Limits, is appropriate.
Transport and Traffic	What will also suffer greatly are our roads. Fordham already has an excessively high amount of H.G.V. and large farm vehicle traffic, our roads are constantly breaking up, frequently making them dangerous to use. What will happen to them when N.G. add dozens or even hundreds more heavy vehicle movements per day? Let's not forget that the whole project is planned to last for three and a half years.	7.3 Outline Construction Traffic Management Plan (Revision B) details the Applicant's proposed construction routeing strategy. The Applicant is proposing to prioritise the use of the Major and Strategic Road Networks and utilise Primary Access Routes (PARs) on mainly 'A' and 'B' roads to route construction traffic from the Major and Strategic Road Networks to the site access points along the construction corridor. From these site access points, traffic will be routed off the public highway along temporary internal haul roads to access the construction sites. The Applicant is proposing to utilise a short section of Mill Road (PAR 38), as a PAR (displayed on Figure 1 Page 19 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]). This section will allow construction traffic to cross the River Colne and continue the internal temporary haul road (access between TB-B045/TB-B044 and TB-B046). Construction HGV traffic will not be permitted to travel on other sections of Mill Road through Fordham, or on Fiddlers Hill. 7.11 Transport Assessment [APP-333] details that the Applicant is proposing 16 HGV movements (an increase of 7%) on Mill Road (PAR 38) within the AM and PM peak hours

Topic	Comment	National Grid's response
		during the worst-case construction activity over a seven-week period. Construction traffic will give-way to vehicles travelling on the public highway when exiting the internal temporary haul road. An assessment of likely significant effects on Mill Road (PAR 38) as a result of the Project is presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and it was concluded that no significant effects are expected once mitigation has been applied as detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). This mitigation includes: the preparation of a driver information pack identifying Mill Road as being part of NCN 13 where there may potentially be a higher number of cyclists on the carriageway; and a potential speed limit reduction through this section (from national speed limit 60 mph). The Applicant is proposing a number of crossover points within Fordham, to enable construction traffic to continue to travel along the internal temporary haul road. These locations are on Fossetts Lane (south and east). The Applicant is proposing a temporary speed restriction to 40 mph on Fossetts Lane. The Applicant is proposing to temporarily close Fossetts Lane to allow the safe construction of the crossover point bellmouths and other activities. The proposed diversion route for non-construction traffic is detailed in Plans B and C of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036]. Construction traffic will not be permitted to join/leave the public highway at these crossover points. Where temporary road closures with diversions are necessary these may have a duration of up to four weeks. When considered in the context of other major infrastructure projects, the residual effects in terms of driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. 7.3 Outline Construction Traffic Management Plan (Revision B) includes information on the pre- and post-construction surveys the Applicant is proposing to undertake on routes used by construction HGVs. These surveys will be used for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the conditions in the pre-construction survey.

Topic	Comment	National Grid's response
Health and Wellbeing	It has been mentioned that most of the domestic properties in the parish are not close to what could become a massive, strung out building site, yet there is one house up Fossetts lane that will suffer greatly. The fields immediately to their west and north will be a construction area, with a pylon being erected 60m from their property. The disruption, cost and personal distress to them will be enormous. Again this is poor and thoughtless planning.	The Applicant recognises that uncertainty while the Project is developed may cause anxiety and the Applicant has sought to reduce potential effects on communities and residents through routeing and design. Residential visual amenity impacts are assessed in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Paragraph 13.2.26 of the Residential Visual Amenity Assessment describes the various tests applied to understand visual impact. No property on Fossetts Lane meets the thresholds for assessment. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] includes an assessment of mental health and wellbeing impacts associated with both construction impacts and impacts associated with loss of visual amenity during the operation phase. Measures to mitigate construction impacts are documented in 7.2 Outline Code of Construction Practice (Revision C) and relate to dust management, noise pollution and working practices. During the operation (and maintenance) phase, it is acknowledged that there are likely to be individuals within Fordham Parish who experience adverse mental health and wellbeing impacts associated with visual change; however, this is not considered to be at a significant scale or to disproportionately affect health deprived populations.
Noise and Vibration	There are two properties at the lower end of Mill Road that will also be greatly affected as N.G.'s haul roads cross Mill Road just north of the houses. They will see and hear the heavy traffic rumbling past and around them, day in and day out for months, possibly years.	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts from traffic arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in Fordham in relation to noise and vibration from pylon construction with appropriate mitigation measures.

Topic	Comment	National Grid's response
		Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Historic Environment	Whilst Fordham's ancient heritage is considerable, it is not unique; there are Roman and prehistoric sites in the Horkesleys, West Bergholt, Wormingford, Aldham, Great Tey, Marks Tey and Little Tey and continuing along the A120 and A12 corridors, both Roman roads. Pylons are planned to march right through this historic region.	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on archaeological remains in Fordham Parish and across the Project. A comprehensive desk-based assessment and walkover have been undertaken (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]), along with archaeological evaluation (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 to AS-076], 6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078], 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). This has identified archaeological sites, both scheduled and non-designated, along the proposed route. Where sites of archaeological significance were identified, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant will ensure that any residual impacts are minimised and that appropriate mitigation measures are in place. The 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeological remains should trial trenching within Fordham Parish identify any such significant remains. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.

2.23 Forestry Commission

- 2.23.1 Table 2.23 below outlines the Applicant's comments on the Relevant Representation (RR) provided by the Forestry Commission [RR-1138]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.23 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	Thank you for consulting the Forestry Commission on this project. As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.	Noted
Biodiversity, ecology and nature conservation	Ancient Woodland: We note there are six Ancient Woodlands within the order limits, plus 34 within 15m. Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies	The Applicant has sought to avoid effects on ancient woodland and veteran trees. A full breakdown of the impacts to each ancient woodland and a site-specific mitigation/compensation solution has been provided within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].

Topic	Comment	National Grid's response
	equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).	
Planning policy	Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: “The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.” We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England	The Applicant has set out the planning policy context for the Project within 5.6 Planning Statement [APP-085] and provided a high-level review of compliance within 5.7 Policy Compliance Document [APP-086]. The Defra, Forestry Commission and Natural England policy paper ‘Keepers of time: ancient and native woodland and trees policy in England’ during Project development and this has been referenced within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].
Biodiversity, ecology and nature conservation	We are satisfied that potential impact pathways have been considered in the Ancient Woodland and Veteran Tree	The Project has considered the Forestry Commission and Natural England Standing Advice (2022) which states that ‘For ancient woodlands, you should have a buffer zone of at least 15 m to avoid root damage...’. The application of a 15 m buffer from ancient

Topic	Comment	National Grid's response
	Strategy document. However, concerns remain regarding the use of the minimum advised buffer. The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction. The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased. While it is noted that in some circumstances avoidance of the buffer zone will not be possible, it is concerning that air and dust pollution is only considered to have an impact	woodland is currently the standing advice available and is considered appropriate for the temporary works associated with the Project and would avoid tree root damage. The Study Area to assess the impact of dust and air pollution as a result of construction dust and construction traffic emissions is determined by appropriate guidance. For construction traffic emissions the Study Area extends to 200m from roads affected by the construction traffic (based on roads that trigger appropriate criteria). For dust the Study Area extends to 50m of the Order Limits where ecological receptors are identified that could be affected by construction dust based on the IAQM Guidance on the assessment of dust from demolition and construction. Based on this assessment it has been concluded that there would be no significant effects on ancient woodlands as a result of changes to air quality. Therefore, effects are captured beyond 15m. With the implementation of relevant mitigation measures the assessment also concludes there would be no significant effect on designated ecological habitats including ancient woodlands. The results of both assessments are presented within 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] and mitigation measures are detailed in 7.2 Outline Code of Construction Practice (Revision C).

Topic	Comment	National Grid's response
	for 15m. Whereas it is known that dust and air pollution can have a significant effect on Ancient Woodland for a far greater distance, including up to 100m into the woodland.	
Biodiversity, ecology and nature conservation	While some works within the Ancient Woodlands will be unavoidable, particularly for the removal of existing assets, the planned careful mitigation measures including the detailed sensitive construction methods may prevent some level of deterioration to the woodlands and removal will be of benefit to the woodland, particularly if allowed to regenerate naturally.	The Applicant notes and welcomes this comment. The Applicant has sought to avoid effects on ancient woodland and veteran trees. A full breakdown of the impacts to each ancient woodland and a site-specific mitigation/ compensation solution has been provided within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] .
Biodiversity, ecology and nature conservation	However, where construction traffic and access tracks are planned within the buffer zones of several Ancient Woodlands, it should be considered whether it is possible to move the access routes out of the buffer zone. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.	While every effort has been made to avoid ancient woodland through careful routeing and siting there are some ancient woodlands where direct/indirect impacts are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection zone. However, these impacts have been minimised and appropriate mitigation set out in detail within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. This document sets out clear mitigation measures required at each of the ancient woodlands to ensure no significant long term residual effect and to ensure compliance with the Overarching National Policy Statement for Energy (EN-1 (2024)). In addition to this, 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) includes commitments

Topic	Comment	National Grid's response
	The buffer zones and RPA's should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic which may potentially carry heavy equipment. Where roots are particularly vulnerable to compaction and the effects of an increase in air pollution may have an effect. Any effect from the incursion into buffer zones or RPA's may not become immediately apparent and will need to be extensively monitored, even after construction.	that detailed design will avoid/minimise impacts on ancient woodland as far as practicable. This is also recorded as Commitment in the 7.2 Outline Code of Construction Practice (Revision C) .
Landscape and Visual	Ancient and veteran trees: Ancient and veteran trees are also irreplaceable habitats. We note that 15 veteran trees may be impacted by the development, with 4 requiring removal.	The Project currently reports the loss of four veteran trees (as a worst-case), however this would be reviewed during detailed design with effort made to retain the trees by the Main Works Contractor(s). Commitment GG14 in 7.2 Outline Code of Construction Practice (Revision C) confirms that relevant surveys for arboriculture would be undertaken to reduce the impact of the Project on trees and hedgerows (this includes the veteran trees).
Biodiversity, ecology and nature conservation	While full compensation is unachievable for irreplaceable habitat, we acknowledge efforts to preserve dead wood structures and seed bank of the trees identified for removal. There may also be some scope for improved management of	The Applicant notes this comment, final details of mitigation and compensation measures would be identified within the Final Landscape and Ecological Management Plan.

Topic	Comment	National Grid's response
	retained irreplaceable habitat to assist with compensation.	
Biodiversity, ecology and nature conservation	Priority Habitat – Mixed Deciduous Woodland and wet woodland: There are several areas of mixed deciduous woodland within the order limits, plus further areas of wet woodland. We note this application will result in the loss off over 200 habitat units for priority habitat woodland.	The Applicant notes these comments. The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. All other tree habitat including woodland (area habitats) is assessed and mitigated through the BNG metric and captured within 7.1 Biodiversity Net Gain Report [APP-299] .
Biodiversity, ecology and nature conservation	Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as priority woodland habitat. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. The majority of woodland habitat across the Project has been avoided. Where complete avoidance has not been practicable, appropriate mitigation has been set out within the 7.4 Outline Landscape and Ecological Management Plan (Revision D) . This includes measures to ensure connectivity is maintained.

Topic	Comment	National Grid's response
	Fragmentation is one of the greatest threats to mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodlands can become isolated in their landscape. Any scheme that bisects a woodland will not only result in significant loss of woodland cover, but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, which will have a negative impact on the natural plants and animals ability to respond to the impacts of climate change. Consideration should be given to improving habitat connectivity of retained woodlands.	
Biodiversity, ecology and nature conservation	Woodland Loss: The application will result in significant loss of canopy cover both as a temporary and permanent loss. Several figures are quoted in different documents, therefore the exact level of woodland loss is unclear. However it is noted that the Biodiversity Net Gain Report states that 38.92ha of	6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] provides an assessment of tree impacts. The 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] outlines the impact on woodland habitat as categorised by UKHAB. During and following detailed design, the Main Works Contractor(s) would seek to reduce impacts and avoid trees/woodland, where practicable. On completion of works, onsite replacement planting will be undertaken in line with the 7.4 Outline Landscape and Ecological Management Plan (Revision D). Woodland mitigation/enhancement is also captured within the 7.1 Biodiversity Net Gain Report [APP-299], which commits to a 10% biodiversity net gain including for woodland habitats.

Topic	Comment	National Grid's response
	woodland will be created as compensation.	
Biodiversity, ecology and nature conservation	Tree and Woodland Planting: Several areas are highlighted for tree planting and woodland creation, although we note this appears to be predominantly for screening purposes. Ideally we would like to see woodland creation carried out in 5ha blocks, or that connective planting with existing woodland should create blocks of at least 5ha. Connectivity could be improved and enhanced across the project area with larger blocks of woodland creation.	The Applicant notes this comment. Environmental Areas are proposed around the Project's permanent assets, where there is sufficient space. Outline landscape plans have been developed for these Environmental Areas as part of 7.4 Outline Landscape and Ecological Management Plan [REP-018]. The outline plans identify individual landscape mitigation proposals for the Environmental Areas which are required for screening purposes. Ecologically, the Environmental Areas also provide habitat mitigation for the permanent impact of the associated substations and Cable Sealing End (CSE) compounds, with habitats of greater ecological value than that being lost, being created and existing habitats managed to a better condition in the long term. Through careful landscape design, these habitats have been created to also provide green corridors to ensure connectivity with the wider ecological network. Final details of the planting to be provided in the Environmental Areas will be provided within the final Landscape and Ecological Management Plan and agreed within the relevant local planning authorities prior to commencing construction activity.
Biodiversity, ecology and nature conservation	There is also the opportunity to link some of the smaller isolated Ancient Woodlands that appear in clusters within or on the edge of the project, for example connective planting between James Spring and Chatterbox Wood (WrittlePark Woodlands) would benefit habitat connectivity and biodiversity. Ecological enhancements to existing irreplaceable habitat would also compensate for any loss or deterioration to ancient	There are currently no proposals for new habitat creation outside of the identified Environmental Areas, other than like for like replacement planting. Mitigation/compensation measures for ancient woodland and veteran trees have already been set out within the 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].

Topic	Comment	National Grid's response
	woodlands or ancient and veteran trees elsewhere in the project area.	
Biodiversity, ecology and nature conservation	The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, especially in areas where there are ancient woodlands. It is stated that all trees planted will be native varieties from local provenance. With a changing climate, a wide species selection will be beneficial, mixed woodland is usually of maximum benefit for habitat provision. Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.	The Applicant notes these comments. Details of the on-site replacement planting following completion of works and habitat creation/enhancement at the identified Environmental Areas, are provided within 7.4 Outline Landscape and Ecological Management Plan (Revision D). The current document is however in outline form; full details on species mixes will be provided in the final LEMP secured under Requirement 4 of 3.1 Draft Development Consent Order [APP-056].

Topic	Comment	National Grid's response
Biodiversity, ecology and nature conservation	Plans should also be in place to ensure the long term management and maintenance of both new and existing woodland and ancient/veteran trees. Perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.	The Applicant has committed to a five year monitoring period for tree and hedgerow replacement planting on land to be returned to landowners. There is also a commitment for a 30-year aftercare period for any planting, including woodlands, at Environmental Areas in line with the commitments made within 7.1 Biodiversity Net Gain Report [APP-299]. Any offsite delivery of BNG will also be subject to a 30 year management period. In relation to any compensation for veteran trees, potential options are detailed within the 7.4 Outline Landscape and Ecological Management Plan Appendix B – Ancient Woodland and Veteran Tree Strategy [APP-323] with the final options to be agreed on a case-by-case basis with details and monitoring and management period set out within the Final Landscape and Ecological Management Plan.
Planning policy	Avoiding impacts and good landscape design: To meet planning policy and Government guidance, we would recommend: • Robust adherence to the Standing Advice, especially regarding buffer zones, to reduce the potential for loss or deterioration to the ancient woodlands or veteran trees. • Plans detailing the protecting measures for existing trees and woodland are adhered to and any works within Ancient Woodland buffers are monitored by the Arboricultural Clerk of Works • Maintain and where possible improve woodland condition, especially ancient woodland.	The provision of a 15 m exclusion buffer from ancient woodland is currently the standing advice available and is considered appropriate for the temporary works associated with the Project. Commitments to maintain a 15 m exclusion buffer for ancient woodlands, where practicable, have been included within the 7.2 Outline Code of Construction Practice (Revision C). All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement (AMS) to be produced following detailed design and agreed with the relevant local planning authorities prior to construction activity commencing. The AMS will include protection measures as outlined in Section 7.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) and illustrated on the Tree Protection Plan. Requirement 4 of 3.1 Draft Development Consent Order [APP-056] mandates that all construction works must be carried out in accordance with the approved specified management plans which must be substantially in accordance with the outline versions. The commitments within the management plans are legally binding and enforceable, with compliance monitored by the relevant authority. The Applicant has committed to deliver 10 % Biodiversity Net Gain (BNG) with wider environmental and societal benefits for the Project, including woodland/woodland edge habitat creation and enhancement within the Environmental Areas. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. A bespoke mitigation/compensation strategy has been prepared for

Topic	Comment	National Grid's response
	• Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges. • Woodland edge creation especially in areas around ancient woodland as part of a mosaic of habitats. • A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.	irreplaceable habitats (ancient woodland and veteran trees) that sit outside of BNG which is presented within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. Section 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees as far as practicable. This is also recorded as commitment GG14 in 7.2 Outline Code of Construction Practice (Revision C).

2.24 Forncett Nature Matters

- 2.24.1 Table 2.24 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Forncett Nature Matters [RR-1139]. **The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application**

Table 2.24 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	Forncett Nature Matters is writing to object formally to the National Grid Norwich to Tilbury overhead pylons Development Consent Order. With over 100 supporters, the organisation has been working hard since 2019 to develop and enhance biodiversity and connectivity in our villages, see (Redacted)	Noted.
Biodiversity, ecology and nature conservation	This project will have a devastating impact on nature and biodiversity along the route. It directly contradicts the Local Nature Recovery Strategy and fails to support the urgent need to restore and enhance biodiversity. The construction and presence of large pylons will fragment habitats and threaten protected trees and roadside nature reserves. Forncett Nature Matters (FNM) have carried out	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on biodiversity including priority habitats and ecologically designated sites (i.e. Roadside Nature Reserves) within Forncett. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation within Forncett. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, including detailed habitat surveys, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good

Topic	Comment	National Grid's response
	plant surveys along areas of the route, including Hurn Lane (Tacolneston) and Valley Farm Road (Forncett), noting rare species such as Burnett Saxifrage and Musk Mallow (full survey data can be supplied on request).	practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as appropriate. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. The Local Nature Recovery Strategy will be considered as part of any off-site BNG site selection process. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Landscape and Visual	Rather than facilitating nature recovery, this project risks further degradation of our natural environment.	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method, e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce risks to habitats and species. In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10% greater than prior to the construction of the Project. The BNG

Topic	Comment	National Grid's response
		target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Chapter 8 of 5.6 Planning Statement [APP-085] considers the planning balance of residual impacts against the need for the Project in accordance with the National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 3.2.7 of NPS EN-1 (2024) substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides '<i>... 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</i>'. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified in the ES fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
Historic Environment	It also threatens historic landscapes and the historic settings of the many listed buildings in Fornsett (including two Grade 1 listed churches,	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Fornsett Parish. The Applicant acknowledges that the settings of some designated listed buildings within Fornsett Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] . Where

Topic	Comment	National Grid's response
	recently restored by community groups with Heritage Lottery Funding) undermining the cultural heritage of the affected areas.	this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas in Fornsett Parish. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures. The Applicant has reviewed the assessment of the Church of Saint Peter considering the respondent's comment. The church is located within its associated graveyard which is defined by low hedges, timber fencing and iron fencing. The graveyard contains several mature trees making for broken views in and out of its bounds. Due to overall distance, and screening by topography, mature tree lined boundaries and development in the intervening landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. The Applicant has reviewed the assessment of the Church of Saint Mary considering the respondent's comment. The church is located within its associated graveyard, which is defined by mature tree lined hedgerows to the south and west allowing for glimpsed,

Topic	Comment	National Grid's response
		broken views outwards, whilst there are open to the north and east over a low hedge. Due to overall distance, and screening by topography, mature tree lined boundaries, copses, and development in the intervening landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate.
Transport and Traffic	The disruption from construction traffic, especially on small country lanes and footpaths, will be massive as National Grids map of works indicates, negatively impacting local communities' wellbeing for years and changing the nature of the village for ever.	The Applicant has focused the detail of the response on the villages of Forncett End, Forncett Saint Peter and Forncett Saint Mary. The Applicant's proposed construction access strategy is detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. The Applicant is not proposing any Primary Access Routes through the Forncett villages. A number of crossover bellmouths are proposed on highways in Forncett End to allow construction traffic to continue on the internal haul roads. The proposed locations are on: • Hurn Lane • Cheney's Lane • Northfield Road • Long Stratton Road • Tabernacle Lane • Link Road. Construction vehicles are not permitted to join/leave the public highway in these locations, unless detailed in a scenario within 7.3 Outline Construction Traffic Management Plan (Revision B), including emergency access. Construction vehicles will give way to vehicles travelling on the public highway in these locations. The Applicant is proposing a number of highway mitigation measures for the roads where crossover bellmouths are proposed. • Hurn Lane – temporary speed restriction to 30 mph • Cheney's Lane – temporary speed restriction to 40 mph

Topic	Comment	National Grid's response
		• Northfield Road – temporary speed restriction to 30 mph • Long Stratton Road – temporary speed restriction to 50 mph • Tabernacle Lane – temporary speed restriction to 40 mph • Link Road – temporary speed restriction to 40 mph. These routes are proposed to be temporarily closed during construction, for the installation of crossover bellmouths and other construction activities. The proposed diversion routes are displayed on Plan B and C in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section A [APP-033]. Where diversion routes are proposed, they will adopt the principle that they will use the same standard of road, or higher where practicable and available. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Within the Parish of Forncett, Forncett Footpaths 28 and 29 will remain open on their existing alignments, with access managed as necessary in accordance with the 7.6 Outline PRoW Management Plan [APP-329], including appropriate safety measures at locations where they interact with construction activities. Forncett Footpaths 25 and 26 will require a temporary diversion, with an increase in journey length less than 500 m. Further details for each affected PRoW are provided in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. All PRoWs will be reinstated as soon as practicable to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRoW management arrangements are developed.

Topic	Comment	National Grid's response
		As a result, it is not considered that there is any significant impact of delay to PRow users once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. The impact of the Project on the health and wellbeing of local communities during the construction and operation (and maintenance) phases is assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. During the construction phase, this includes an assessment of potential health effects associated with community safety (from road traffic), access to social infrastructure (for example healthcare facilities) and mental wellbeing effects associated with construction activities. The assessment has not identified any significant effects in relation to these areas for Forncett ward, and has signposted towards various mitigation measures that would be relevant (for example 7.2 Outline Code of Construction Practice (Revision C) for measures relating to dust management and working practices, and 7.3 Outline Construction Traffic Management Plan (Revision B) for measures relating to construction access).
Alternatives	Critically, the technology proposed is outdated and not aligned with principles of sustainable development. Less harmful alternatives exist, including HVDC underground cables, effective offshore grid coordination, and upgrading the existing grid using modern technology, all of which would better protect biodiversity and support nature recovery goals.	National Policy Statement EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
		The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122].
Consultation	The consultation process has been inadequate, neglecting to explore or present these better alternatives in any meaningful way. From the very outset National Grid presented only one option – Pylons.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122].
Needs Case	National Grid's approach to increasing capacity is damagingly piecemeal and its lack of any strategic, long-term planning is destroying food security capacity across the country from Scotland to Kent. The scale of destruction, in one of the most nature-depleted countries in the world, must be taken into account by the Inspectorate rather than only	The objectives of the Project are manifold and are set by statute, National Policy Statements (NPSs), statutory guidance and ministerial and other guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia identified in NPS EN-1 (2024) (see Sections 2 and 3) for economic, security, sustainability and affordability reasons and in a manner consistent with the provisions and guidance of NPS EN-5 (2024) in accordance with the Applicant's statutory duties. The alternatives considered and the reasons for their being discounted are set out above and are reported in 7.17 Strategic Options Backcheck and Review [APP-355], 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122].

Topic	Comment	National Grid's response
	looking at each project individually. We urge the Planning Inspectorate to reject this Development Consent Order to safeguard nature recovery, heritage, and community wellbeing. FNM fully supports the Essex Suffolk Norfolk Pylons action group. We hope you will consider these objections carefully and reject the proposal. Thank you in advance.	NPS EN-1 makes it clear, in paragraph 4.3.22, that <i>'the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and only alternatives that can meet the objectives of the proposed development need to be considered'</i>. Paragraph 4.3.23 of NPS EN-1 states, <i>'The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.'</i> These objectives, as they flow from the Applicant's statutory duty, have become the nation's objectives following the publishing of government statutory policy, in particular in NPS EN-5 (2024). The critical, urgent need for new transmission lines has become so much more than only grid capacity and the ways of providing it – the attention is now far more on the cost of not providing it in time.
Cumulative Effects	The multiple and extensive applications for mega-solar developments along the pylon route exacerbate the devastating impact on the environment for biodiversity, food security and community wellbeing. This industrialisation must be considered as a consequence of Norwich to Tilbury planning consent. 18,000 acres are already proposed for solar development in South Norfolk alone.	A full list of cumulative developments considered is detailed within the long list of other developments in 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. The cumulative effects assessment also follows the Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment'³⁴. The inter-project cumulative assessment presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate).

³⁴ Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*

2.25 Forncett Parish Council

2.25.1 Table 2.25 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Forncett Parish Council [RR-1140]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.25 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Needs Case	Forncett Parish Council remains strongly opposed to the Norwich to Tilbury pylon project as expressed in our statement of May 2024.	The Applicant notes the Parish Council’s feedback.
Consultation	The pylons have been presented as a fait accompli, and there has been a complete failure to respond to concerns raised in the previous consultation.	All feedback submitted during the Applicant’s consultations, including the two non-statutory consultations, statutory consultation in summer 2024, and targeted consultations in 2025, has been considered by the Project team. In some cases, the Project has been modified in response. A response to all the points raised (regardless of the outcome as accepted or not taken forwards) has been published, either as part of subsequent consultations or as part of the submission documentation. The full listing is within the 5.1 Consultation Report [APP-066] and appendices along with the 5.15 Design Development Report [APP-122] setting out the reasons for some of the more overarching alternatives and more substantive changes. The Applicant has complied with the specific statutory requirements and the relevant guidance on consultation applicable to applications for development consent.
Landscape and Visual	These huge 50m pylons will decimate our beautiful rural landscape	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment (LVIA) study area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240] . Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] .

Topic	Comment	National Grid's response
		Within Forncett Parish, significant effects are identified up to a distance of approximately 1.5 km for landscape and visual receptors.
Biodiversity, ecology and nature conservation	These huge 50m pylons will adversely impact biodiversity and wildlife	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as designated sites, irreplaceable habitats, protected species and ecological connectivity/wildlife corridors within the Forncett area. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors, including those within Forncett Parish. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, the findings of which informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitments.
Socio-economics, recreation and tourism	These huge 50m pylons will disrupt communities	The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact community facilities and identifies potential mitigation measures where appropriate to reduce negative impacts. No effects have been identified for community facility receptors located within Forncett Parish Council in the assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line.

Topic	Comment	National Grid's response
		The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance³⁵. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Land and Property	These huge 50m pylons will reduce property values.	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.

³⁵ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
Cumulative effects	It is not only the pylons, but all the support services, the access requirements for the construction machinery and the long-lasting effect of all this upheaval, which is potentially more damaging than the pylons themselves!	An Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures are defined within each environmental topic chapter and set out in relevant environmental control documents, including 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. 7.2 Outline Code of Construction Practice (Revision C) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction. The Applicant is proposing a construction routing strategy where construction vehicles are routed along Primary Access Routes (PARs), to site access points from the Strategic and Major Road Networks. The Applicant is not proposing any PARs within the Fornsett Parish. The Applicant is proposing to route construction vehicles along the internal haul road, with a number of crossing points located within Fornsett End. Construction vehicles will not be able to join/leave the public highway in these locations, unless defined by a scenario within 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 in 7.2 Outline Code of Construction Practice (Revision C) addressing routing, highway safety, dust, noise and ongoing maintenance of access routes.
Alternatives	Pylons should be a last resort, not a default position. It is our considered view that you have proceeded with unseemly haste and failed to adequately investigate viable alternatives. These include:	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to

Topic	Comment	National Grid's response
	• upgrading the existing grid first, using proven technologies • underground HVDC cables, which are cost-effective, low impact and fast to deliver. • Off-shore links from Norwich to Tilbury Whilst we fully understand and appreciate the need to improve the capacity of the Grid, it is shortsighted at best to deliver this with what is an outdated system. When pylons were first used to deliver electrical energy across the country, there was no alternative. If this were still the case, pylons would remain an acceptable method today. BUT THERE IS, and we should not be doing anything that destroys our countryside when there are viable, better, less damaging and arguably cheaper alternatives. Cost should not however be the driving force, but what is best for our country, our people and our health.	2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357], the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

2.26 Gislingham Parish Council

- 2.26.1 Table 2.26 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Gislingham Parish Council [RR-1271]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.26 Comments and National Grid's response

Topic	Comment	National Grid's response
Health and Wellbeing	Residents are deeply concerned about the proposed pylon route and the serious impact it will have on their wellbeing and livelihoods. The constant uncertainty, disruption, and stress caused by the planning process already affect mental health and community cohesion. If implemented, the route will bring long-term noise, visual intrusion, and environmental damage, reducing quality of life for families and vulnerable residents.	The Applicant recognises that uncertainties in the pre-construction period can cause stress and anxiety for local people and has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential impacts of the Project on mental health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], particularly in relation to the construction phase. The assessment references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Likely health effects arising from noise and visual intrusion during the construction phase are also assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the Gislingham community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings.

Topic	Comment	National Grid's response
		This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns.
Alternatives	The original plans, outlined in the so-called “Graduated swathe” have changed little since inception even though they were based on old, out of date maps. Consequently, the Wortham Airstrip was missed, necessitating a huge, unsightly curve in the route. Recent developments to the east of Gislingham were not noted, meaning residential properties are placed much closer to the route than they should be.	The presentational mapping used for consultation material is not the source of information that informed the development of the graduated swathe nor subsequent development of the alignment that has formed the basis of the DCO application. The route alignment has responded to the presence of a wide variety of environmental features, homes and constraints including the presence of residential properties to the east of Gislingham and the airstrip identified from a wide range of published sources and a range of site surveys.
Alternatives	No discussion has been allowed to look at alternative proposals meaning the quality of decision making for such an important project has been negated. To quote one example (from a list of many) within Gislingham residents have suggested alternative proposals including a pylon route to the east of the railway line or to the west of our entire community.	Both of the specific proposals identified as well as others have been considered. The reasons for the preference for the route forming the DCO application are set out in the Consultation Feedback Reports and Design Development reports. The particular examples referred to are discussed in Section 5.2 of 5.15 Design Development Report [APP-122] .
Biodiversity, ecology and	The environmental impact has been continually negated by NG. In Gislingham alone it is	The vegetation clearance assumptions are set out in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and tree impacts for Gislingham are presented on 2.16 Trees and Hedgerows to be Removed and or Managed Plans –

Topic	Comment	National Grid's response
nature conservation	estimated entire hectares of historic woodland including trees under specific preservation order are to be removed. This, combined with the destruction of associated wildlife habitats will have a significant effect on our local environment. One of NG's objectives is "environmental net gain" (ENG). How can this wholesale destruction contribute toward ENG?	Section B [APP-049]. The woodlands around Gislingham have been predominantly avoided by the Project, with woodland impacts being limited to a small section of woodland along Thornham Road that does not qualify as ancient woodland. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] is based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. The 7.2 Outline Code of Construction Practice (Revision C) includes measures to ensure that tree/hedgerow removal is reduced as far as practicable through the detailed design process. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce impacts on valuable habitats. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and not expected until May 2026). The Applicant has committed to delivering 10% BNG with environmental and societal benefits (i.e. Environmental Net Gain (ENG)) on all construction projects. The BNG and ENG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Transport and Traffic	Planning notices by Terra Quest (NG's land representative) and the Planning Inspectorate have been placed on all roads into and out of Gislingham. These include the proposed widening of Coldham Lane to facilitate the double pylon construction across the railway line, areas to the east of Mill Street, areas to the east and west of Burgate Road and Mellis Road, alterations to the ecologically	The Applicant notes the concerns raised regarding planning notices erected by its land representative, Terra Quest, on roads and land around Gislingham, including Coldham Lane, Mill Street, Burgate Road, Mellis Road, the River Dove corridor and Thornham Road. The Applicant confirms that the erection of statutory notices forms part of the requirements of the Planning Act 2008 and associated Regulations, to ensure that affected land, access routes and communities are formally notified of the Development Consent Order (DCO) application and the extent of the Order Limits. As set out in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing a construction routeing strategy where construction vehicles will be routed along Primary Access Routes (PARs) to the site access points. The Applicant is not proposing a PAR on Mill Street, Coldham Lane, Burgate Road, Mellis Road or Thornham Road. The Applicant is proposing to use a small section of Major Lane to route construction traffic under the railway bridge, to continue on

Topic	Comment	National Grid's response
	sensitive River Dove east of Mellis Road and areas to the north and south of Thornham Road. These comprise all main access routes within our community. None have appeared on current or recent NG's plans. Why has this been permitted to happen without any discussion or consultation or opposition?	the internal haul road. Construction traffic is expected to give way to vehicles travelling along the public highway. The Applicant is proposing crossover bellmouths on Mellis Road, Major Lane and Burgate Road, to allow construction vehicles to continue to travel along the internal haul road. Mellis Lane and Major Lane/Thornham Road are proposed to be temporarily closed for where no diversion is proposed. The Applicant considers managed traffic management appropriate to complete the works on these roads. This is subject to detailed design development, agreement of traffic management measures and the associated stages of Road Safety Audits. The Applicant is proposing temporary speed restrictions on these routes in Gislingham: • Burgate Road – Speed restricted to 50 mph • Mellis Road – Speed restricted to 40 mph • Thornham Road/Major Lane – Speed restricted to 30 mph. Burgate Road is proposed to be temporarily closed for a short period within the construction programme, primarily associated with the construction of the crossover bellmouths. The proposed diversion is detailed in Plans B and C in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034].
Noise and Vibration	The proposed construction traffic and heavy machinery will generate significant noise and vibration. This poses a direct risk to Gislingham's historic buildings, many of which are structurally fragile and irreplaceable. Vibration damage can undermine foundations, crack masonry, and destabilise drainage systems, while excessive noise will reduce quality of life for residents. These impacts have	An assessment of construction noise and vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment undertaken concludes there would be no significant effects in Gislingham in relation to noise and vibration during construction, including potential damage to buildings, with appropriate mitigation measures in place. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the

Topic	Comment	National Grid's response
	not been adequately assessed or mitigated in NG's plans.	application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Health and Wellbeing	Beyond physical damage, prolonged exposure to noise and vibration will affect residents' health, particularly the elderly and vulnerable. Stress, sleep disruption, and reduced mental wellbeing are well-documented consequences of such disturbances. Why has NG failed to provide clear assurances or mitigation measures for these risks?	Potential impacts on health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This includes an assessment of health effects as a result of noise and vibration during the construction phase. Paragraph 10.7.14 identifies that some people may be more vulnerable to changes in noise level than others, for example people living or working in the vicinity of the Project, children, older people (who may be more likely to experience hearing-related conditions), people with pre-existing physical and mental health conditions, people with newborn babies, shift workers and people in low-income households. The assessment is informed by findings from 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which identifies the potential for significant adverse construction noise effects during daytime, nighttime and weekend periods, associated with highways remediation and haul road works, cable and pylon construction, the construction of the temporary construction compounds and conductor stringing; however, with the use of mitigation in the form of best practicable means, the magnitude of impact of construction noise is expected to be negligible to small at all nearby residential receptors. It is noted in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] that health effects relating to changes in noise levels during the construction period are likely to be experienced at individual rather than at population level and that no significant health effects are anticipated.
Alternatives	No costing has been provided to compare alternative options suggested by residents and parish councils. Without transparent financial analysis, it is impossible to determine whether NG's chosen route represents best value for money or whether viable, less damaging alternatives have been unfairly dismissed. , This omission undermines the	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base).

Topic	Comment	National Grid's response
	integrity of the planning process and raises serious questions about whether decisions are being made in the public interest or solely to maximise corporate profit.	Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages.
Consultation	We remain deeply concerned about the general health and wellbeing of our community. The constant requirement to act and respond, frequently at short notice, to the various requirements of the planning process, the constant uncertainty and incessant concerns about what will happen to us and our community, is extremely worrying. Many residents are not familiar with all the vagaries of the planning process which places us all at a distinct disadvantage to the NG and all its commercial supporters. They are not concerned about the welfare of individuals or community. Their principal interest is profit. In such circumstances, we call on our local and national representatives to support us and question the viability of this project and support the	The Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required).

Topic	Comment	National Grid's response
	concerns of our communities to oppose this project in its current form.	
Cumulative Effects	We are equally concerned about the Norwich to Tilbury Project and its relationship with EcoPower Suffolk's proposals for the vast solar farm. These two projects, anticipated to run concurrently, will have a significant impact on our village, converting it from traditional, agrarian-based community to one vast power station. Neither NG or EcoPower Suffolk have any interest in the genuine care of our community.	6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate). The Applicant can confirm that EcoPower Suffolk Solar is being considered as part of the post 1 April 2025 cumulative assessment – as part of this work if additional significant effects are concluded details would be published into the Examination.
N/A	The proposed route of overhead pylons on the edge of our small village, Gislingham, has raised serious concerns among residents. These concerns reflect both immediate and long-term risks to our environment, infrastructure, and community well-being:	Noted, the individual concerns listed are responded to in detail below.
Historic Environment Biodiversity, ecology and	Environmental and Heritage Impact The route threatens biodiversity, including habitats along hedgerows, ditches, and	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Gislingham Parish. The Applicant acknowledges that the settings of some designated assets within Gislingham Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental

Topic	Comment	National Grid's response
nature conservation	ancient field margins. It risks degrading heritage landscapes, including views from and settings of Grade II listed buildings and conservation areas.	Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Gislingham Parish. The Project will not result in any substantial harm to designated heritage assets. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors, including on hedgerows and watercourses, based on a suite of ecological surveys undertaken over the 2022–2025 period. No significant residual effects on ecological receptors were identified. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a

Topic	Comment	National Grid's response
		clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Cumulative Effects	The cumulative impact of multiple energy projects—including solar farms—has not been adequately assessed.	Gislingham Parish is within Mid Suffolk District and is located within Section B of the Project. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025 including those within Gislingham Parish. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination (as appropriate). The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] concludes that in Mid Suffolk, overall, negligible and not significant effects would be expected in relation to socio-economics, recreation and tourism; ecology and biodiversity; contaminated land, geology and hydrogeology; hydrology, flood risk and land drainage; health and wellbeing; historic environment; noise and vibration; and air quality. Moderate adverse significant effects could not be ruled out in relation to construction effects on landscape and visual receptors, and major adverse significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils. Noting that mitigation cannot reduce effects owing to the nature of the effects.
Transport and Traffic	Infrastructure and Access Concerns Rural roads, including Hall Roads and narrow lanes, are unsuitable for sustained HGV traffic, risking	The Applicant has developed the construction access proposals in response to the nature of local roads. The proposals use Primary Access Routes (PARs) that are suitable for two-way HGV movements as the routes to the Project sites and connects these with haul roads which will cross other roads as required with suitable crossing bellmouths installed. The Applicant has produced two documents, 7.3 Outline Construction Traffic

Topic	Comment	National Grid's response
	damage and safety hazards. affecting local businesses and emergency services.	Management Plan (Revision B) (Outline CTMP) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Suffolk County Council for approval post consent. Within the Parish of Gislingham there is one PAR located along B1113 Finningham Road/B1113 Walsham Road (PAR 12) with construction traffic routing from the A143 through Finningham on Wickham Road (PAR 13) to the site access points. These PARs are displayed on Figure 1, Page 10 in 7.11 Transport Assessment - Appendix I - Figures [APP-342]. An assessment of significant effects was undertaken for PAR 12 and PAR 13 on driver / public transport passenger delay, pedestrian, cyclists and horse rider severance, amenity and fear and intimidation, and safety as detailed in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment was undertaken on the daily (07:00-19:00) worst-case peak construction period on both PARs as presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that there would be no significant effects when taking account of the proposed mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). For the B1113 Finningham Road / B1113 Walsham Road (PAR 12) this mitigation includes providing information within the driver information pack of locations where pedestrians cross the carriageway or could be walking on carriageway, cutting back vegetation and maintenance of verges, improving existing advanced warning signage, notices on Public Right of Way access and surface colouring under 'SLOW' markings. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] details that PAR 12 and PAR 13 have a proposed temporary vehicle net increase of 26 HGV movements in both the AM and PM peak hours. This equates to a percentage increase of 9% and 12% respectively in the AM peak hour, and 9% and 13% respectively in the PM peak hour. This peak worst-case construction activity would be over a duration of two-weeks.
Water environment	The area's fragile drainage network could be further	Section 4.10 of 7.9 Flood Risk Assessment [APP-331] provides an assessment of surface water flood risk during the construction and operation (and maintenance) of the

Topic	Comment	National Grid's response
	stressed, increasing the risk of flooding.	Project. It addresses the measures that would be in place to reduce the impacts on the existing land drainage network and surface water flood risk including for some parts of Gislingham Parish. Further details are provided in 8.2 Drainage Strategy DCO [REP1-072] , which was submitted at Deadline 1.
Health and Wellbeing	Community Well-being Footpath closures during construction would reduce access to nature and exercise [, impacting]	The Applicant notes the concern regarding footpath closures during construction and the potential impact this may have on access to nature and exercise, mental health and social cohesion. Potential impacts on health and wellbeing are described in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and include an assessment of impacts as they relate to physical activity, taking into account potential impacts on footpaths and green spaces. The assessment notes the importance of physical activity for both physical and mental health and wellbeing, highlighting the mental health benefits associated with access to nature and green space, as well as the role of Public Rights of Way (PRoWs) and areas of open space in fostering social interaction and building community cohesion. The assessment is informed by information set out in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Table 10.13 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] categorises Gislingham as a location where the scale of potential impact relating to physical activity is likely to be low. This, combined with the fact that the duration of effects (e.g. closures of PRoWs) is generally short-term, and that alternative routes and provision of recreational areas are generally available for use for the period over which effects are predicted to last, no significant effects on physical or mental health and wellbeing are anticipated. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Within the Parish of Gislingham there are three PRoWs that will be impacted by the Project during construction: Bridleway W-267/014/0 and Footpaths W-267/021/0 and W-

Topic	Comment	National Grid's response
		267/022/0. These PRowS will all remain open on their existing alignments throughout construction, with access managed as required at points where they interact with construction activities, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.
Landscape and Visual	The visual intrusion of pylons undermines the tranquil character of the village, affecting residents' quality of life	The Applicant recognises that there will be significant effects on landscape and visual receptors as a result of the Project within Gislingham Parish, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Within Gislingham Parish, significant effects are identified up to a distance of approximately 1.5 km for landscape and visual receptors. Tranquillity of the existing landscape baseline is considered within the value criteria in Tables A12 and A13 in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and contributes to the judgement on effects.
Alternatives	We urge National Grid and relevant authorities to reconsider the proposed route and explore less intrusive alternatives, including offshore or underground cabling, and to conduct a Strategic Environmental Assessment that fully accounts for cumulative impacts.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

2.27 Great and Little Leighs Parish Council

2.27.1 Table 2.27 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Great and Little Leighs Parish Council [RR-1311]. **The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.**

Table 2.27 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Alternatives	Great & Little Leighs Parish Council believes that the magnitude of harm to the parish and parishioners is not acceptable and an alternative solution must be found.	The Applicant notes the respondent’s feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review [APP-355]), and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). This sets out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into a new East Anglia Connection Node (EACN) Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future – driven by the government’s plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator’s (NESO’s) Clean Power 2030 report ³⁶ . The need case is reviewed at each critical stage of the Project’s development and without a robust demonstrable need the Project would be revised or fall away. Currently, the contracted generation shows a clear need for the Project.
Biodiversity, ecology and	The devastating environmental impact from the proposed construction works on the	National Grid has sought to minimise impacts on ecologically designated sites, priority habitats and protected species through careful route selection and siting of the Project. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]

³⁶ National Energy System Operator (2024) *Clean Power 2030*

Topic	Comment	National Grid's response
nature conservation	surrounding area for wildlife is a large concern.	assesses the effects on important ecological receptors, including those in the Great and Little Leighs area. A suite of ecological surveys has been undertaken over the 2022–2025 period; this baseline information has been used to assess the potential impacts of the Project. Where ecological impacts are anticipated, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) clearly set out all ecological mitigation measures to be implemented, including embedded, standard and additional mitigation. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on ecology receptors identified. Although the mandatory requirement for 10% Biodiversity Net Gain (BNG) under the Environment Act 2021 is not yet in force for development consent schemes, the Applicant has also voluntarily committed to delivering 10% BNG with wider environmental and societal benefits for this Project in line with its corporate sustainability commitments.
Water environment	The additional concrete works could cause flooding in various locations. This in turn can potentially cause pollution into the river Ter, which is already heavily polluted, with a notable reduction of wildlife in recent years.	Concrete works in the vicinity of the River Ter are limited to the foundations/bases of pylons TB127 and TB128. Other works in the vicinity of the River Ter would not involve concrete. A raft of measures have been secured in 7.2 Outline Code of Construction Practice (Revision C) with respect to flooding from rivers, reducing pollution risk and safeguarding water quality and associated habitats and protected species.
Historic Environment	There too is a concern of flooding near the local heritage sites within the area	The risk to local heritage assets sites has been considered in 7.9 Flood Risk Assessment [APP-331] which assessed a range of risks from different sources of flooding. Relevant mitigation is referred to within 7.9 Flood Risk Assessment [APP-331], detailed in 7.2 Outline Code of Construction Practice (Revision C) and has been agreed with the Environment Agency. Regarding archaeological features with sensitivity to hydrological changes within the Great and Little Leighs area, there are already conditions set out in 7.2 Outline Code of Construction Practice (Revision C) which would avoid dewatering: <i>'GH07 - Any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance (Environment Agency, 2023b.</i>

Topic	Comment	National Grid's response
		<i>Environment Agency, 2022. Environment Agency, 2021a, Environment Agency 2021b) including appropriate assessment undertaken as required by the guidance (Environment Agency, 2007), and if required, an Abstraction Licence and Environmental Permit (for the discharge) will be obtained, and the works will be limited to the depth and time required to facilitate construction activities.'</i> And: <i>'GH14 - During dewatering of excavations, any water removed would be discharged as close to the excavations as practicable in line with GH07. Water would be discharged so that the dewatered groundwater body is recharged as much and as soon as practicable.'</i> With these controls in place and the conclusions of 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181], it is not considered that there is potential for significant effects to archaeology within Great and Little Leighs area from dewatering.
Land use	The site is in close proximity to agricultural lands so there again is concern of how these will be affected	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Great and Little Leighs Parish (a mix of Grade 2 and Grade 3a). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Great and Little Leighs Parish, to protect the soil resource, are detailed

Topic	Comment	National Grid's response
		in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its ALC grade, or as agreed with the landowner.
Socio-economics, Recreation and Tourism	along with jobs potentially lost due to large areas not being able to be farmed leading to relevant farming skills potentially being lost.	The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.
Land and Property	The value of homes in the closer proximity to the pylons in the parish will be negatively affected to a considerable degree.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaully-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaully-Denny power line.

Topic	Comment	National Grid's response
		Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Cost	Consultation doesn't explain if the costs include the land purchases along the route, we think all relevant costs should be shown in the consultation.	For the statutory consultation, the Applicant prepared indicative estimates of the capital costs involved in the options we considered, which included land. These indicative estimates were based on the high-level scope of works defined for each strategic option in respect of each technology option that is considered to be feasible; these were presented in the 2024 Strategic Options Backcheck and Review (available as Appendix B in 7.17 Strategic Options Backcheck and Review [APP-355]) and updated in the 2025 Strategic Options Backcheck and Review (7.17 Strategic Options Backcheck and Review [APP-355]). As these estimates were prepared before detailed design work had been carried out, we made equivalent assumptions for each option. This methodology ensured that all options for appraisal proposes were compared on a like for like basis. A full and transparent cost model is provided in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355], which sets out in transparent detail how options appraisal costs were evaluated
Biodiversity, ecology and nature conservation	There are many protected trees (TPO) along the route	Paragraph 51 of 3.3 Draft DCO - Validation Report for DCO [APP-058] deals with the process for trees covered by a Tree Preservation Order (TPO). The level of detail within 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] is based on the methodology outlined in Appendix J of 6.19 Scoping Report including appendices B to K [APP-296] and is considered appropriate for this stage of the Project. Information on TPOs is included in 2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055] which has been developed using information provided by relevant Local Planning Authorities. Commitment LV05 in 7.2 Outline Code of Construction Practice (Revision C) states that relevant protective principles would be applied to trees within the Order Limits and detailed within an Arboricultural Method Statement.

Topic	Comment	National Grid's response
Transport and Traffic	[There are many ...] protected lanes.	National Grid has sought to reduce, as far as practicable, impacts on protected lanes, including the lanes within Great and Little Leighs Parish, through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. A Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] sets out the potential landscape and visual effects, including consideration of visual amenity of people travelling along protected lanes and also impacts on landscape character which may for example be influenced by vegetation loss along protected lanes during construction. 7.4 Outline Landscape and Ecological Management Plan (Revision D) includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment H06 set out in 7.2 Outline Code of Construction Practice (Revision C). Section 9.8 provides for reinstatement of protected lanes, including vegetation, earthworks and boundary features, and requires pre-construction photographs to ensure a record to inform any reinstatement. As noted in commitment H06 in 7.2 Code of Construction Practice [REP2-014], a topographic survey will be undertaken in advance of works/impact to each protected lane (Essex) and historic lane (Suffolk) within the Order Limits, where likely to be affected by physical works.
Transport and Traffic	There is a concern for traffic issues as Boreham Rd is key to access to the A12 and the new train station in Beaulieu Park. Heavy construction traffic will cause chaos on this single lane road in some places not to mention cause damage to an already pot holed road surface.	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). This details how construction traffic will use the Strategic and Major Road Networks to access the region and will then be routed along prescribed Primary Access Routes to the site access points. From the site access points, traffic will be routed off the public highway along haul roads to access the construction sites. Boreham Road is not proposed to be used as a Primary Access Route and therefore the Project is not expected to increase the number of HGVs along this route. A short-term, temporary closure of a section of Boreham Road is required during construction, between points SM-F-003 and SM-F-008 as shown on Sheet 1 in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]. Where diversions are necessary (due to temporary closure of roads), they will adopt

Topic	Comment	National Grid's response
		the principle that they will use the same standard of road, or higher where practicable and available. A diversion route for the short-term, temporary closure of Boreham Road is proposed along Goodmans Lane and Paulk Hall Lane. Boreham Road is also identified as a temporary diversion route for the short-term closure of Fairstead Lodge Road. The residual effects for driver delay (journey times) are considered not significant for short-term temporary road closures as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within 7.3 Outline Construction Traffic Management Plan (Revision B) which is secured through Requirement 4 of 3.1 Draft Development Consent Order (Revision C).
Needs case	In summary, we object with our first preference for a fully integrated offshore grid.	The Applicant notes the respondent's feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review [APP-355]), and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). This sets out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into a new East Anglia Connection Node (EACN) Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future – driven by the government's plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator's (NESO's) Clean Power 2030 report³⁷. The need case is reviewed at each critical stage of the Project's development and without a robust

³⁷ National Energy System Operator (2024) *Clean Power 2030*

Topic	Comment	National Grid's response
		demonstrable need the Project would be revised or fall away. Currently, the contracted generation shows a clear need for the Project.

2.28 Great Bromley Parish Council

- 2.28.1 Table 2.28 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Great Bromley Parish Council **[RR-1312]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.28 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	I am submitting this representation on behalf of Great Bromley Parish Council (GBPC) in regard to the Nationally. Significant Infrastructure Project (NSIP) that relates to the Norwich to Tilbury project proposed by National Grid. GBPC strongly objects to the proposals particularly the East Anglian Connection Node (EACN) with associated multiple sub stations that will be in close proximity to the village boundary. Summary of Objection. Great Bromley Parish Council objects to the Norwich to Tilbury project proposals on the following grounds: We wish to raise our objections to the Norwich to Tilbury overhead pylons project,	Noted.

Topic	Comment	National Grid's response
	specifically noting its impact on Great Bromley.	
Landscape and Visual	The proposed overhead lines will dominate the landscape, cause significant visual intrusion and harming the rural character of Great Bromley.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised by Great Bromley Parish Council. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Great Bromley Parish are set out under Visual Receptor Areas (VRAs) C12 Ardleigh and C13 Little Bromley in paragraphs 13.6.138 to 13.6.165 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Great Bromley Parish are set out in paragraphs 13.3.375 to 13.3.391 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under the Landscape Character Area (LCA) 7a Bromley Heaths. Effects on landscape and visual receptors would be significant within approximately 1.5 km of the Project, within the northern part of the Parish.
Transport and Traffic	The construction will lead to increased traffic congestion from heavy vehicles, disturbing residents.	The Applicant is proposing a construction routeing strategy, which routes construction vehicles along Primary Access Routes (PARs) from the Strategic and Major Road Networks to the site access points. There are no proposed PARs – and therefore no predicted heavy vehicle movements – through Great Bromley Parish. The Applicant is proposing short-term temporary road closures within Little Bromley. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. Carringtons Road, Morebarn Road, Badley Hall Road, Hilliards Road and Park

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Noise and Vibration	The construction will lead to noise and dust pollution from heavy vehicles, disturbing residents and local wildlife.	Road within Great Bromley Parish are all proposed to be diversion routes associated with temporary closures. Construction traffic is not proposed to use the diversion routes. 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors, including those within Great Bromley Parish, from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated in Great Bromley. These measures are secured by Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order (Revision C). Section 7.2 of 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] discusses the results of the construction dust assessment. The assessment was undertaken in line with IAQM Construction Dust Assessment Guidance³⁸. The assessment considers receptors up to 250 m from the Order Limits. 6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area [APP-154] shows a 250 m boundary around the Order Limits. The assessment concludes that with appropriate implementation of the mitigation measures specified in the 7.2 Outline Code of Construction Practice (Revision C) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] there would be no likely significant effect due to dust nuisance for receptors within 250 m of the Order Limits, including residents and local wildlife within Great Bromley Parish.
Transport and Traffic	The traffic will not only be from extremely large machinery but also from the hundreds of construction site workers estimated at 1200 in total.	The Applicant is proposing a construction routeing strategy, which routes construction vehicles along Primary Access Routes (PARs) to the site access points. There are no proposed PARs through Great Bromley Parish. As a result, construction workers are not expected to travel through Great Bromley Parish to get to site. The Applicant is proposing an additional 162 light vehicles during the AM and PM Peak periods on the worst-case construction period for one week, travelling on PAR 30 and PAR 31 (Bentley Road and Ardleigh Road), for construction workers to access the site at

³⁸ Institute of Air Quality Management (IAQM) (2024) *Guidance on the assessment of dust from demolition and construction*

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		the East Anglia Connection Node. Additionally, construction workers are anticipated to arrive and depart site outside of peak times. Image A16.4.30 and Image A16.4.31 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] set out the anticipated construction vehicle daily trip distribution for the duration of the construction period for PAR 30 and PAR 31 respectively. The Applicant has developed 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]. The purpose of this document is to ensure appropriate consideration is given to the safety and travel patterns of site workers, ensure the environmental impact of construction staff is minimised and encourage construction workers to travel to the site via sustainable modes.
Alternatives	Moreover, overhead pylons are unnecessary in today's context, given the availability of better alternatives such as HVDC underground cables, offshore coordination, and upgrading the existing grid with modern technology.	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault.

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		Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	These alternatives would avoid the severe environmental and community disruption that Great Bromley and surrounding areas would otherwise suffer.	At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys
Alternatives	We also feel that the site selection process for the East Anglian Connection Node is an inappropriate location that deviates significantly from the Norwich to Tilbury pylon route and therefore question why this site was chosen and no explanation or evidence as to why the alternatives were not selected.	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardeigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 there were alternatives considered that would avoid routeing through the National Landscape.
Alternatives	Why has there been a failure to consider and consult on different alternatives to pylons such as a subsea alternative utilising brown field sites for coming onshore closer to	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons

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	Tilbury where the power is needed.	are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Land and Property	There is also concern of residents in the local area suffering from significant property value loss which should be compensated for by National Grid and the costs incorporated into the overall cost of the project, considering that there are alternatives that would not have this impact such as preferably subsea or underground HVDC.	Property values are influenced by many factors. While National Grid recognises that visual impact may lead to perceptions of property value loss, there is no reliable evidence that environmental effects reduce house values due to the Project. Where a property owner is not directly affected by the Project, UK law does not provide compensation for a perceived fall in property value due to proximity or changes to a view.
Biodiversity, ecology and nature conservation	The loss of significant number of trees and hedgerows that will disrupt many wildlife habitats is also a concern and we do not believe National Grid have been sympathetic to this.	National Grid has sought to minimise impacts upon trees and hedgerows through careful route selection and siting of the Project. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG with environmental and societal benefits on all

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		construction projects. The 10% BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment
Land Use	High quality and versatile agricultural land (Grade 2 and 3a) will be lost and impacts to farm access and drainage.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]). National Grid has sought to minimise impacts on BMV agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable.
Socio-economics Recreation and Tourism	There will be harm to tourism in the area as well as local people who have regular walks and generally enjoying the countryside.	Socio-economic impacts on the tourism economy and recreational routes are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The chapter concludes that there would be no significant effects on the tourism economy within the Wider Study Area or recreational routes within Great Bromley Parish Council as a result of the Project.
Alternatives	Therefore, I urge the Planning Inspectorate to reject the Development Consent Order for this project and support less damaging options that protect both the environment and the wellbeing of communities like Great Bromley.	The objection of Great Bromley Parish Council is noted. The Applicant has set out how the Project is compliant with relevant policy in the 5.6 Planning Statement [APP-085] .

2.29 Great Horkesley Parish Council

- 2.29.1 Table 2.29 below outlines the Applicant's comments on the Relevant Representation (RR) provided Great Horkesley Parish Council [RR-1314]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.29 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	1.Great Horkesley Parish Council ("GHPC") does not support the application. This representation sets out in summary GHPC's concerns and what it considers the issues and effects to be. 2.The case for need is not demonstrated in terms of the particular route and in terms of the timing. Even if there is a need for grid reinforcement and a need to transport electricity from offshore generated wind farms currently landing in Norwich, to Tilbury to take it to where it is needed in London and beyond, it is not accepted that the Norwich to Tilbury proposal is the best way of doing so and there is concern in particular that the route unnecessarily crosses national landscape (AONB), does not make use of the latest	The Applicant acknowledges the position of GHPC but also notes that the rationale for not progressing an offshore solution has been reported in material published in support of consultations held in 2022, 2023 and 2024 and of the application itself. This has included in the CPRSS [REP1-068], three Design Development Reports [APP-358-360] and the Strategic Options Backcheck and Review [APP-355 and APP-357]. The Applicant has also made it clear that the Project is about connecting the new offshore sources of generation for the benefit of the whole country. The connection point at Tilbury should not be interpreted as the destination for the power. It is just the case that that provides the most economic and efficient point of reinforcement given the need case. We have also clearly set out the basis for not progressing with HVDC as a technology and they are rooted in the fact that we are required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The applicant disagrees with the GHPC view that options have not been costed properly. A comparable basis has been used to support efficient progress. We also note that it would be disingenuous to consult on alternatives that were known not to meet our regulatory requirements.

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	technology (including HDVC), and has not been properly costed or all options properly considered and consulted upon.	The alternatives considered and the reasons for their being discounted are reported in 7.17 Strategic Options Backcheck and Review [APP-355] , 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 5.15 Design Development Report [APP-122] .
Transport and Traffic	3. Locally to GHPC, we have particular concern about the Dedham Vale National Landscape that falls within our Parish, the significant cluster of listed buildings adjacent to the proposed line, the impact of the infrastructure on the locality characterised by open countryside and historic village, and also the impact of construction traffic as a result of unnecessarily funneling all traffic through the village and residential areas.	Comments on the national landscape and listed buildings are responded to in detail in relation to more specific comments raised later in the RR, as below in this table. Regarding, traffic, the Applicant is proposing a construction access strategy detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). This proposes to route construction traffic on Primary Access Routes (PARs) to site access points. From the site access points, construction traffic will then travel on the internal haul road. This is in line with EN-1 Policy to re-route vehicles away from congested areas of the network. The Applicant is proposing a PAR through Great Horkesley, connecting to the A12. The route follows the A1341 (PAR 35), A134 (PAR 36) to the site access point (TB-B022 and TB-B023), displayed on Figure 1 Sheet 18 of 7.11 Transport Assessment Appendix 1 Figures [APP-342]. 7.11 Transport Assessment Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] indicates that the Applicant is proposing 74 LGV movements and 44 HGV movements on both PAR 35 and PAR 36 in the AM and PM peak hours, for a peak duration of one week. This equates to a total increase in traffic of 8% and 10% on PAR 35 and PAR 36 respectively. Outside of the one-week peak activity there are lower fluctuating traffic movements on both PARs throughout the construction programme during the peak hours as presented on Image E.35 for PAR 35 and Image E.36 for PAR 36. The Applicant has assessed the impact on the A1341 Via Urbis Romanae / A134 Northern Approach Road junction (Site 44) as presented within Section 7.11 in 7.11 Transport Assessment [APP-333]. The results indicate that the junction would operate within capacity with the addition of Project construction traffic, with no significant delays expected. An assessment of significant effects was undertaken for PAR 35 and PAR 36 on driver / public transport passenger delay, pedestrian, cyclists and horse-rider severance, amenity

Topic	Comment	National Grid's response
		and fear and intimidation as detailed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The assessment was undertaken for daily flows (07:00-19:00) during the worst-case peak construction period on both PARs as presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that there would be no significant effects when taking account the proposed mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B).
Landscape and Visual	Summary of Concerns, Issues & Effects Great Horkesley Parish, Setting & Harm 4. Great Horkesley is a rural parish comprising a village and open farmland, and the Northern part of the parish falls within the Dedham Vale National Landscape (AONB). The surrounding landscape is open to the North, East and West. Most of the parish is atop a plateau, very flat, and at a relative high point topographically (50M above sea level and close to the local 55M peak at Redhouse Farm). There are very few trees and the 50M pylons and associated infrastructure at the sealing end compounds, especially the Eastern compound, will be both prominent and clearly visible for a significant distance, including	a) <i>Landscape effects</i> We note the concerns raised by the Parish Council, and the references to tree cover, topographical variations and the nature of the views in and around the parish, all of which are taken into consideration during the routing stage and during the assessment of visual effects resulting from the Project. The assessment is in accordance with the approach set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], which is in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and Clarification Notes. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. While there would be significant effects during construction due to the installation of underground cables, these would reduce and gradually become not significant during operation, as vegetation cover is restored. The Applicant acknowledges the proposed pylons would be visible from the edge of the National Landscape at construction and operation, however these effects are assessed as not significant, as set out in Section 13.7 of VRA D1 Tye Green and Boxted and VRA D2 Little Horkesley and Wormingford within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. There would be no visibility of the Project from the floor and sides of the Stour Valley, within the National Landscape. From the National Landscape, much of the CSE compounds (Great Horkesley (EACN side) and Great Horkesley (Tilbury side) would be screened by existing tree cover and, over time, mitigation planting within the Environmental Areas around the CSE compounds

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	within the Dedham Vale National Landscape / AONB (see contour maps and viewsheds). Such will also be visible from the large cluster of historic and listed buildings at very close proximity to the route through the village and from the main road through the village (The Causeway) which has open views across fields where the proposed route crosses and from which the infrastructure will be clearly visible.	would increase screening. Furthermore, at a distance of approximately 1.3 km, gantries would be difficult to perceive, as set out in Table A13.1.1 of 6.13.A5 Environmental Statement Appendix 13.5 – National Landscape Assessment Study [APP-235]. Visual effects on The Causeway are considered within VRA D3 Great Horkesley and Horkesley Heath. Effects are assessed as significant within 0.5 km to the west of the Causeway (A134) and significant within 1.5 km to the east of the Causeway (A134) at both construction and operation, as set out in paragraphs 13.7.25 to 13.7.40 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Further detail on the Applicant's position regarding effects on the National Landscape is provided below in this table (item 13). <i>b) impacts on heritage assets</i> 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets in Great Horkesley. The Project would not result in any substantial harm to designated heritage assets. Embedded and standard mitigation proposals for listed buildings are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility

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		and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures.
Alternatives	5.Great Horkesley Parish Council endorses the view of the OFFSET MPs and Essex, Suffolk, Norfolk Pylons, that a fully integrated offshore route should be properly considered, evaluated, costed, and presented as an option. Such a route has the potential to remove considerable harm from the amenity of this village, the AONB and the surrounding countryside..	The Applicant disagrees with GHPC and has the position that the need case is clear and proven, the timescale is urgent and there is clear guidance on the general form as a predominantly onshore overhead line based connection. We carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024. The Applicant's position is that it does not agree with the report's conclusions that a delay to 2035 would be possible nor that HVDC is cost neutral or lower cost. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis¹², Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Alternatives	Further and alternatively, HDVC cabling which is at least cost-neutral, if not cheaper, ought to be considered for the whole scheme (and route re-evaluated); such causing significantly less harm due to	National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital

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	the narrower construction swathe. Newer technologies should be considered and employed where possible	cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Landscape and Visual	We also note that undergrounding itself causes significant harm to the amenity and tranquility of the area particularly during its construction, necessitating 120m wide trenches, but also potentially causes lasting damage to the landscape trenched, particularly where the trenching is shallow.	The Applicant recognises that there will be significant effects on landscape and visual receptors within Great Horkesley Parish, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Within Great Horkesley Parish, significant effects are identified up to a distance of approximately 1.5 km for visual receptors, reducing to within 0.5 km from VRA D1, and within approximately 0.5 km for landscape receptors at construction and operation. Construction activity associated with undergrounding, including the digging of trenches and removal of vegetation, has been considered within the construction assessments. Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (REP2-018) outlines the commitment to reinstate hedgerow field boundaries and the drafting of Requirement 9 of the 3.1 Draft Development Consent Order [APP-056] confirms that reinstatement planting works will be implemented at the earliest opportunity. Tranquillity of the existing landscape baseline is considered within the value criteria in Table's A12 and A13 in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and contributes to the judgement on effects.
Noise and Vibration	The construction trenches, compounds and haul roads are located in extremely close	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] . The

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	proximity to residences including Grade II and Grade II* listed buildings who will be particularly impacted and at risk of harm from visual blight, noise and vibration.	assessment provided indicates that no significant effects are expected in Great Horkesley in relation to noise and vibration, including potential damage to buildings, from construction activities whether appropriate mitigation measures are implemented. Additionally, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Needs Case	Need Case Not Demonstrated 7.The need case is not made out in terms of the how and when the project is delivered. There may be a need for reinforcement, but there is no demonstrable need for such to be delivered by 2030 - see the independently commissioned Hiorns report (November 2023). There is also no need for it to take the route and use the technology it does. NESO concluded that HDVC would be no greater cost than the current proposal.	The Applicant disagrees with GHPC and has the position that the need case is clear and proven, the timescale is urgent and there is clear guidance on the general form as a predominantly onshore overhead line based connection. We carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis¹², Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.

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		The Applicant also notes constraints in the high voltage direct current (HVDC) market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards (NETS SQSS), which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service.
Consultation	Consultation Deficiencies / Infringement of the Gunning Principles 8. GHPC has serious concerns as to significant deficiencies in the consultations carried out by National Grid. The route appears to have been pre-selected and a foregone conclusion, and breaches the Gunning Principles. 9. Bearing in mind both the Gunning Principles and requirements under the Planning Act 2008 (both addressing adequacy of consultation), we consider that	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].

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	the consultations were not carried out in any meaningful way; no real alternatives were presented to be consulted on (the route had overall been determined by National Grid); there was a lack of proper information (for example costings) and consultation responses were not adequately (or 'consciously') considered. Indeed, as we raised in response to the 2024 Statutory Consultation, matters raised in previous consultations (in the 'feedback report') were often responded to by National Grid in the future tense eg "will propose mitigations" – but how could we respond to a future intention?	
Alternatives	10. There has been a lack of transparency and no proper and costed analysis of alternative options. 11. The justification for the route was circular – it needed to cross the Dedham Vale National Landscape to connect to the East Anglia Connection Node at Ardleigh – but National	The general requirement for the EACN was defined by the independent NESO and reflects the general location of the windfarm customers. Alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards partly due to additional challenges and effects associated with that as a general location and partly benefits of a Tendring peninsula location (see paragraph 3.5.53 in 6.3 ES Chapter 3 Alternatives. The selected location for the EACN east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable.

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	Grid themselves decided that that was the location of that node.	The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN 1 (2024) and NPS EN 5 there were alternatives considered that would avoid routeing through the National Landscape.
Alternatives	12.HDVC cabling, which is at least cost-neutral, has not been considered, despite it causing significantly less harm, not only as compared to overhead lines, but also due to its narrower construction swathe compared to the current underground sections.	Please refer to the earlier response regarding HVDC cable.
Landscape and Visual	National Landscape, Significant Harm & Breach of Duty 13.The Dedham Vale National Landscape and its setting will be caused significant harm. Relevant authorities have a duty to 'seek to further' the statutory purposes of protected	Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term 'harm') on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect arising from infrastructure proposed outside the designated area. 'Harm' is not reported on in a Landscape and Visual Impact Assessment, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁵, as part of the Environmental Impact Assessment (EIA) process, but it is considered in the planning balance, given use of the term in the policy above.

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	landscapes (s.85 Countryside and Rights of Way Act as amended).	The purpose of a National Landscape is to '<i>conserve and enhance natural beauty</i>', as set out in the Countryside and Rights of Way Act 2000. The Special Qualities of Dedham Vale National Landscape (DVNL) explain the aspects of natural beauty which are important for this nationally protected landscape. When considering effects on Special Qualities, the long-term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute 'harm' to these Special Qualities. There will however be some significant visual effects on views looking outwards from the DVNL. The fact that the Project will be visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant (and so will not constitute 'harm'). Note that, in terms of indirect effects, the potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End compounds to the north of Raydon airfield and at Great Horkesley. In addition, there will be short to medium-term significant effects on the Special Qualities of DVNL during construction and after reinstatement, as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. This is because of the time it takes grassland to establish across disturbed areas, and for hedgerows and trees to grow. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The assessment was undertaken taking into consideration the Special Qualities, which describe which aspects of natural beauty are important in the DVNL. The assessment was also informed by a Position Statement from the Dedham Vale National Landscape Partnership. The Position Statement clarifies that: '<i>The National Landscape Partnership...considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in substantial impacts, positive or negative, on the natural beauty and special qualities of the AONB.</i>' [emphasis added]. It is considered (as informed by paragraph 5.10.34 of NPS EN-1 (2024)) that the reference to 'substantial' impacts here is taken as meaning the 'likely significant effects' identified through the EIA for the Project.

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		The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].
Planning Policy	14. The National Planning Policy Framework makes it clear that great weight should be given to conserving and enhancing landscape, scenic beauty, wildlife and cultural heritage. The scale and extent of development within protected landscapes should be limited. Development in the setting of such landscapes should be sensitively located and designed to avoid or minimise adverse impacts. Permission should be refused for major development other than in exceptional circumstances. 15.NPS-EN5 (paras 2.9.12 & 2.9.21) requires applicants to avoid entirely National Landscapes such as the Dedham Vale and, where avoidance is impossible, to	The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and

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	underground lines unless engineering infeasibility or greater harm can be proven. Even “residual impacts” may make a scheme unacceptable in planning terms. Redrafting of NPS in 2024 made it explicit that impact upon the Dedham Vale can be caused by infrastructure beyond its boundaries and set the requirement that any cables which impact the Vale should be undergrounded save for where it is infeasible in technical terms or where to do so would be more harmful than using Pylons. Cost is not a relevant factor in the terms of NPS-EN5 when pylons would harm the Dedham Vale and the policy is explicit in stating that rerouting must occur even if cost is greater and route longer. 16.The Levelling-up and Regeneration Act 2023 (s.245) imposes a statutory duty to conserve and enhance natural beauty, applying not only within	5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

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	National Landscapes but also to any development that affects them. Damaging the Dedham Vale can hardly be consistent with the need to conserve or enhance it. Even if enhancements are made elsewhere the need to conserve stands in its own right.	
Landscape and Visual	17.The current proposal fails both tests. National Grid acknowledges that its pylons and compounds will be visible from within the Dedham Vale, causing negative effects on its “special qualities”, including the Constable landscape. Harm that is both predicted and avoidable cannot satisfy the duty to conserve or the policy requirement to avoid residual impact. 18.There is no need to bring the Norwich to Tilbury line across and alongside the Dedham Vale National Landscape at all. There are no	An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant’s consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to ‘conserve and enhance natural beauty’ in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant has explained the basis for the Project design building from the Need Case and the most economic and efficient means of delivering it. The Applicant does not agree with GHPC about the role of HVDC on this Project either for the whole project or for parts. The reasons are set out in earlier responses and are not reported here. We do however agree with the use of underground cable (AC) within the

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	exceptional circumstances. Further and alternatively, any development must be sensitive and minimise harm. Overhead cables should be avoided entirely within both the National Landscape and its setting. And undergrounding should be using the latest technology, HDVC, to minimise harm.	National Landscape and have carefully identified points of transition back to overhead line informed by balanced decision making.
Historic Environment	Significant Harm – Historic Environment, Residences, Ecology, Health, Visual Impact Listed Buildings & Residences 19.GHPC is concerned about the significant harm to the historic environment and residences. There is a significant cluster of listed buildings in extremely close proximity to the proposed line in the Parish. Significant harm will be unavoidable and would include visual blight, noise and vibrations, affecting their amenity and setting. 20.We would draw your attention to the significant number of residences and listed buildings that will be in extremely close proximity to the proposed trenching works, haul roads and construction	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. 5.15 Design Development Report [APP 122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The Project would lead to no harm or less than substantial harm to listed buildings. Embedded and standard mitigation proposals for listed buildings is set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including Historic England. Mitigation follows the mitigation hierarchy and

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	compounds. Significant harm to these listed and residential buildings is unavoidable and will include visual blight, noise and vibrations, which will not only affect their amenity and setting, but also (re vibrations) potentially their structural integrity. Concerns include the impact on Grade II* listed Chapel Cottage and significant cluster of other listed buildings and residences in close proximity to where the route crosses the A134, and several listed buildings along School Lane including New Barn House (the haul road passing extremely close to such building without foundations, in the setting of which is a particularly beautiful pond, fed by the water table). 21.If the scheme is to go ahead as proposed, appropriate advice will be needed and significant mitigation measures and monitoring will be required.	measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Noise and Vibration	22. We are concerned that vibrations from works will cause structural harm to residential buildings near to the cable route, many of which are Listed	An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is so that potential

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	and lack foundations beyond a brick or two beneath the sole plate. 23.National Grid must employ a heritage consultant well experienced in buildings of north-Essex heavy timber frame construction in order to advise on the likely effects of vibration and potential methods of mitigation. In any event National Grid must also take responsibility for damage and must fully accept that damage may take a number of years beyond the construction period to become apparent.	'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration, nine of which are in Great Horkesley. Of these, all nine in Great Horkesley relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than day). With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations, none of which are located in Great Horkesley, have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or potential structural damage, can be avoided with the use of best practicable means (BPM). This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306])). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post-condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Alternatives	24.The use of HDVC technology ought to be seriously considered, with a narrower construction swathe.	National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base).

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		Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. There are practical challenges to the use of HVDC where the Project is proposing underground cables not least the siting of the three large convertor stations required at each end of the HVDC section. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Biodiversity, ecology and nature conservation	Ecology & Biodiversity, Health & Well-being 25.GHPC is concerned about the significant harm to ecology and biodiversity in the Parish that will be caused by the construction of the line. More than 10 km of hedgerows and 500 acres of farmland in the area would be destroyed, fragmenting habitats for otter, water vole, bats, newts, red kite, and owl. The corridor also lies within the East Atlantic Flyway, one of seven UK sites proposed for UNESCO World	The Applicant does not recognise the figures stated by Great Horkeley Parish Council, the actual habitat impacts are included within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. It should be noted that these assessments are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows would be minimised as far as practicable. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. Potential fragmentation impacts as a result of the Project has been fully assessed for each relevant ecological receptor within the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Suitable mitigation measures for fragmentation impacts during construction have been developed in consultation with Natural England and Local Planning Authorities to ensure no significant residual effects for any ecological

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	Heritage status—an international conservation interest that NPS-EN1 5.10 and NPS-EN5 2.9 require to be protected..	features. Full details on the mitigation measures are provided within 7.4 Outline Landscape and Ecological Management Plan (Revision D) .
Biodiversity, ecology and nature conservation	26.Farm hedges are multifunctional elements in agricultural landscapes, providing environmental, agricultural, economic, aesthetic, and climate regulation benefits. They play a crucial role in promoting biodiversity, protecting crops, managing water and soil resources, and enhancing the visual and cultural value of the countryside. Maintenance of existing hedges is therefore essential for sustainable and resilient farming systems. National Grid plans to remove extensive sections of hedge at access and crossing points with local roads as well as between fields in open countryside. The degree of removal indicated goes far beyond what is required and will inter-alia: a. significantly disrupt habitat impacting birds, insects and	7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting has been proposed within Environmental Areas surrounding the permanent National Grid asset. Illustrative landscape designs for these areas have been provided within 7.4 Outline Landscape and Ecological Management Plan (Revision D). In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.

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	small mammals as well as removing corridors which connect distinct habitats and allow wildlife to move safely between areas causing a reduction in diversity. In turn this will reduce beneficial predation increasing the need for use of chemical pesticides and encourage pests into fields resulting in damage to crops.	
Land Use	b. Remove natural windbreaks increasing soil erosion as well as increasing flow of water across fields causing increase run-off with similar outcome	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] . This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Great Horkesley Parish (a mix of Grade 2 and Grade 3a land). Soil management measures to be implemented during construction across the Project, including across Great Horkesley Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303] . The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Landscape and Visual	27.c. Dramatically reduce shielding and thereby increase the visual impact of construction works affecting local communities and damaging, albeit temporarily, important visual receptors.	The assessment of construction effects on visual receptors recognises that some vegetation removal would occur as a result of the Project, including some removal within VRA D1 Tye Green and Boxted, VRA D2 Little Horkesley and Wormingford, VRA D3 Great Horkesley and Horkesley Heath and LCA Great Horkesley Farmland Plateau. The Environmental Statement is based on an assumed worse case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] . Within Great Horkesley Parish,

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		significant effects are identified up to a distance of approximately 1.5 km for visual receptors, reducing to within 0.5 km in VRA D1, and within approximately 0.5 km for landscape receptors at construction and operation, as set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (REP2-018) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision B). Measures to avoid/mitigate impacts to all trees (including veterans) also form Project commitment LV05 in 7.2 Outline Code of Construction Practice (REP2-014). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (REP2-018) outlines the commitment to reinstate hedgerow field boundaries. The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan (REP2-018). This is secured by Requirement 4 within 3.1 Draft Development Consent Order [APP-056]. Details of on-site tree planting will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056]. The Project would prioritise the replanting for individual trees within the Order Limits, however off-site provision may be required. Any off-site tree planting required because of this commitment would be secured via a legal agreement. This is discussed further in the Biodiversity, Ecology and Nature Conservation - Replacement Tree Planting section in Chapter 3 of this report.
Health and Wellbeing	28. GHPC is concerned about the significant harm to the health and wellbeing of local residents.	An assessment of the potential impacts of the Project on health and wellbeing during both the construction and operation phases of the Project has been undertaken, with findings presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment covers impacts relating to both physical and mental health, and covers health impacts relating to topics including air quality, noise, visual amenity, physical activity, community safety and access to social infrastructure. No significant health effects have been identified as a result of either the construction or operation phases of the Project.

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Landscape and Visual	29. There will be significant harmful visual impact from the sealing end compounds in the Parish, particularly the Eastern one, which is extremely close to and in the setting of the Dedham Vale National Landscape. It is located on a flat elevated plain and will be visible from the heart of the village. The Essex Way passes around it in close proximity. See further below. 30. GHPC notes that there are no viewpoints and visualisations from our village at all. 31. Landfall maps produced by National Grid show that there are points in the Dedham Vale where between 50 and 60 pylons will be visible and that 'full structures' of Pylons will be visible across much of the Vale.	Please see response to item 13 regarding impacts to the National Landscape. The Applicant acknowledges the concerns relating to visual effects on users of the Essex Way which passes the eastern CSEC at Great Horkesley. Effects on the Essex Way are set out within Section 13.12 Assessment of Effects on Routes in 13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant acknowledges that there would be significant effects on users of the Essex Way, which would range from major and significant (adverse) to minor and not significant (adverse). The Applicant acknowledges there are no viewpoints located at Great Horkesley village. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were shared and discussed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (5.9.1 to 5.9.12 [REP1-010 to REP1-032]). The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in 7.12 Visualisations [APP-343 - APP-349]. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the 7.12 Visualisations [APP-350 - APP-351]. It is important to note that the LVIA is based on first hand observations during site visits and not on visualisations alone. Effects on receptors within Great Horkesley are assessed in VRA D3 Great Horkesley and Horkesley Heath. Significant effects on receptors at Great Horkesley are assessed within approximately 1.5 km at construction and operation, as set out in 13.A3 Environmental Statement Appendix 13.3 - Visual policy above.
Alternatives / Landscape and Visual	Impact of Sealing End Compound / Alternative Undergrounding from Ardleigh	The Applicants response to items 32 to 38 is partly covered by the response to item 29 above in addition to the following. The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a

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	32. National Grid accept that "we consider that landscape and visual effects between the EACN substation and Great Horkesley, may be widespread and therefore reach the threshold set out in NPS EN-5".	designated landscape (so the strong presumption for overhead line is not reversed) nor do the effects constitute harm to the special qualities of the National Landscape. It is possible that the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 are met leading to a need to consider whether the use of underground cable is justified. We conclude that the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant's view is this is not justified. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
	33. We suggest that the section of cable from EACN at Ardleigh to Great Horkesley be undergrounded to mitigate the effects on our Parish and the impact upon the National Landscape.	
	34. The Norwich to Tilbury cables cross the Dedham Vale which is a National Landscape. The Pylons and Sealing End Compounds between TB1 and TB41, located within our parish or nearby parishes,	

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	cause damage to the Dedham Vale at a level which National Grid's own documents demonstrate to be well beyond the merely 'residual'. There is nothing in our parish or in the neighbouring parishes which would have led to difficulties in engineering underground cables, and given that they would pass through farmland nothing to suggest that damage done by undergrounding here would have outweighed the benefit to removing impact from the Dedham Vale. 35. The starting presumption should have been underground and should have been followed. 36. Cost is not a relevant consideration.	

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	37. Undergrounding from Ardleigh would remove infrastructure – there would be no need for the Eastern Sealing End Compound at Horkesley Plantation (which would remove cost). 38. National Grid raises technical constraints. To the extent that this case is proven, it is noted that the constraints relate to the Ardleigh area and not this Parish.	
Historic Environment	39. The siting of the sealing end compound at Horkesley Plantation necessitates multiple gantries and pylons in a small area in close proximity to both the Dedham Vale National Landscape / AONB and also to a very significant concentration of Listed Buildings at Great	5.15 Design Development Report [APP-122] from section 7.2 sets out the different locations considered to move the eastern Great Horkesley CSEC further to the east. The Applicants position is that the project infrastructure is positioned sufficiently far from the National Landscape such that it does not in itself lead to a level of effect that requires the adoption of technology mitigation. The main points regarding Landscape and visual effects and heritage are set out below. For details regarding the DVNL and sealing end compounds, please refer to previous response above. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. The Project would lead to no harm or less than substantial harm to listed buildings. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline

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	Horkesley (including a large number of Grade II listed and one Grade II* listed very near to the proposed route). In more detail: a. Land in this area is exceedingly flat, with only a few metres between the local peak (55m, Redhouse Farm) and the intended location of the Sealing End Compound (50m). b. There are no significant dips in the land and no other features capable of providing screening to or from either the listed buildings or the National Landscape. c. Given the flatness of the land, any gantries, towers or pylons in this area will be widely visible.	Landscape and Ecological Management Plan (Revision D). The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design and retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries). 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. 5.15 Design Development Report [APP 122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.
Socio-economics, Recreation and Tourism	d. Proximity of the CSE compound to the Essex Way will also cause significant harm to amenity for significant numbers of walkers from across the region and beyond	The Applicant acknowledges the concerns relating to visual effects on users of the Essex Way which passes the eastern CSE compound at Great Horkesley. A response is included to this issue in point 29 above. Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on sports clubs, recreational land and recreational

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		routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include: traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.2 Outline Code of Construction Practice (Revision C); 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329].
Landscape and Visual	e. The industrialisation of the Parish in this area is entirely incompatible with the setting and will do significant and lasting harm to an area which, per the Horlock and Holford rules, should have been 'avoided altogether'. The situation is made more problematic by the concentration of infrastructure including gantries and heavier tension towers in a small space near to the Sealing End Compound which leads both to unacceptable wirescape and	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment (LVIA) Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences.

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	significantly increases the sense of industrialisation.	Application of the Holford Rules therefore typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. Decision making on route alignment around Great Horkesley is set out in section 7.2 of 5.15 Design Development Report [APP-122] .
Alternatives	f. The choice of site is unsuitable as it would harm the setting of Listed Buildings at Great Horkesley and the Dedham Vale National Landscape. Our primary position is, if the line is routed as proposed, then it should be undergrounded from Ardleigh, removing the infrastructure; alternatively, the CSE compound at Horkesley Plantation needs to be relocated significantly further East if it is to be located along the route currently indicated (with reconsideration of the Eastern CSEC alternatives identified by National Grid). 40. Wherever it is located, it is imperative that the Sealing End Compound is thoroughly screened from view from all Listed Buildings and that it is	The Applicant has considered feedback regarding both movement of the eastern CSE at Great Horkesley and replacement of the overhead line TB1 to TB34 (EACN to eastern CSE compound) with underground cable. The 5.15 Design Development Report [APP-122] in section 7.2 (particularly paragraph 7.2.4) sets out the Applicants position around alternative CSE locations. The main point is that the sites within the submission are acceptable in policy terms. The effects of overhead line do not justify either a need to move further from the national landscape nor do they justify a change in the context of paragraph 2.9.23 of NPS EN5 for the effects in isolation. On the point of undergrounding between the EACN and Great Horkesley, document 5.15 Design Development Report [APP-122] sets out from paragraph 6.5.26 various technical challenges to a change to underground cable. The Applicants position is that a change to cable between Ardleigh and Great Horkesley is not justified. Overall, alternative locations or the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement

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	located such that even the tallest sections are perceived against woodland background in order to break up the visual impact in any directions where it is impossible to plant trees. The landscape in this area is dotted with small pockets of woodland, which also feature heavily near to ponds, along brooks and rivers, and occasionally between fields. 41. It would be perfectly natural in this setting to plant tall fast-growing native tree species densely along each side of the Sealing End Compound, Gentries and Tension Towers and to plant additional groups of trees along the line of site from nearby buildings and the main road, closer to the	(NPS) EN1 (2024) and NPS EN5 there were alternatives considered that would avoid routeing through the National Landscape. On item 42 the Applicant has considered alternative locations and presented its conclusions from paragraph 6.5.8 in document 5.15 Design Development Report [APP-122]. We cannot present an alternative that we cannot deliver, that does achieve our regulatory or operational needs.

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	buildings and road (and hedging plants where it crosses the cables). Screening will provide lasting benefit and should be put in place immediately National Grid take control of the relevant areas to ensure that growth is established even before construction commences. No other EACN potential sites have been consulted upon. Siting additional infrastructure in close proximity to the National Landscape would be a poor choice and unacceptable in planning terms; the resulting adverse impact upon the National Landscape and its setting would be contrary to the requirements of NPS-EN5 2.9; even residual impact is unacceptable	
Transport and Traffic	Public Highways, Construction Traffic & Amenity 43. National Grid itself declared the road through our village to	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP)

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	be sensitive. From their own figures in the 2024 consultation they proposed an extra 321 vehicles per day along the VUR, NAR and A134, of which 193 would be HGVs. This would be a 64% increase of HGVs along Nayland Rd / The Causeway in the village. Documents for the DCO show a trip distribution for Link PAR 36 of up to 800 total construction vehicle daily trips, of which just under 600 would be HGVs... the activity taking place over a 3-year period.	that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post consent. The Applicant sets out the proposed construction routeing strategy in 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The construction vehicle routing strategy has been designed to minimise impacts across the highway network. Construction traffic will use the Strategic and Major Road Network to access the region and then will route along prescribed Primary Access Routes (PARs) to the site access points. From the site access points, traffic will be routed off the public highway along haul roads to access the construction sites. PAR 36 is proposed along the A134 Northern Approach Road/A134 Wildeve Avenue/A134 Nayland Rd/A134 in Great Horkesley as shown on Figure 1 page 18 of 30 in 7.11 Transport Assessment - Appendix I – Figures [APP-342]. The Applicant's assessment in 6.16.4 Appendix 4 Traffic and Transport Construction Effects [APP-275] details an increase in total daily traffic of 800 vehicle movements (12%) of which 506 would be HGV movements on PAR 36 - A134 Northern Approach Road/A134 Wildeve Avenue/A134 Nayland Rd/A134 The Causeway during the worst-case construction peak period with a duration of one week. Image A16.4.36 indicates the construction flow on the A134 throughout the construction period. Outside of this peak construction period, the construction flows will be lower. The Applicant has noted the sensitivity of PAR 36 and identified the following mitigation to minimise the significance of effects as a result of the Project: • Updating the driver information pack to warn drivers that pedestrians may be in the highway, walking either in the verge or carriageway; • Ensuring adjacent vegetation is maintained to keep verges and PRow access points clear and allow full width of the footway to be utilised; • Use warning signage to warn drivers of upcoming pedestrians crossing the carriageway. 7.3 Outline Construction Traffic Management Plan (Revision B) provides additional detail on the driver information pack, and the information which will be shared with drivers

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		prior to construction. The management and mitigation proposed is secured within Requirement 4 of the 3.1 Draft Development Consent Order [APP-056]. The Applicant is proposing an increase in 74 Light Goods Vehicle (LGV) movements and 44 Heavy Goods Vehicle (HGV) movements in the AM and PM peak hours along the A134 for a peak duration of one week. This is an increase in total traffic of 10% during the peak hours during the worst-case construction peak period. Outside of this peak construction period, the construction flows will be lower as shown in Image E.36 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has completed, as part of 7.11 Transport Assessment [APP-333], junction modelling on those junctions identified as sensitive based on existing congestion or potential capacity issues due to the increase in traffic. No sensitive junctions were identified on the A134 within Great Horkesley Parish.
Transport and traffic	44. The adverse impact on the village will be huge. Concerns include traffic congestion, noise and pollution, but also very significant increased risk to pedestrians and cyclists. National Grid intend to remove traffic islands and similar which act as traffic calming and pedestrian refuges. This is the main road through the village and has a pedestrian footway only on one side of the road (the side of which changes necessitating	The Applicant is proposing a Primary Access Route (PAR) through Great Horkesley, connecting to the A12. The route follows the A1341 (PAR 35), A134 (PAR 36) to the site access point (TB-B022 and TB-B023), displayed on Page 1 Sheet 18 of 30 in 7.11 Transport Assessment Appendix 1 Figures [APP-342]. The Applicant acknowledges the sensitivity around transporting abnormal loads through Great Horkesley and is committed to maintaining safe pedestrian crossing facilities during the construction of the Project. Mitigation measures proposed in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315] include temporary removal of street furniture to accommodate design vehicle movements along the A134 which includes the removal of traffic islands to facilitate the required Abnormal Indivisible Load (AIL) vehicle movements. Appropriate traffic management and/or temporary traffic islands will be provided at these locations between AIL movements, as agreed with the Local Highway Authority. 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] provides further details.

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	crossing) and in places is extremely narrow.	An Environmental Statement (ES) (Volume 6: Environmental Statement) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to minimise impact. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the Development Consent Order (DCO) application, including 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation, and road safety on PAR 35 and PAR 36 in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] notes that pedestrian crossing facilities are provided along both PAR 35 and 26 and that these would be maintained throughout the construction of the Project, albeit with temporary traffic management in place to be agreed with the Local Highway Authority. Therefore, no significant effects on severance were identified by the increase in traffic as a result of construction movements associated with the Project. For amenity and fear and intimidation it was found that the significance of effects was slight for PAR 35 along the A134 through Great Horkesley Parish, but large adverse for PAR 36 and deemed significant. Mitigation has been proposed as detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). This includes ensuring adjacent vegetation is maintained so the full width of footways is available, placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway and highlighting, within the driver information pack, areas where there may be a greater presence of pedestrians and cyclists along or crossing the A134 (PAR 36).
Transport and traffic	45. GHPC requests that the plans are reconsidered with an alternative route directly off the	The Applicant has assessed the suitable and feasible options available when proposing the routing of the Project Primary Access Routes (PARs). The identification of PARs and their specific mitigation measures have been produced for the anticipated construction

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	A12 (whether at Junction 28 or otherwise) to the haul roads.	vehicles associated with each location and developed iteratively through engagement with the Local Highway Authority, and public consultation feedback. This has included consideration of alternative available routes, and the relative suitability, sensitivity and practicality of each option. The option for a new temporary construction access from the A12 has not been proposed. This is supported through engagement with National Highways and is supported by DfT policy (Strategic Road Network and the Delivery of Sustainable Development), which has a general presumption against new connections for temporary access, and is considered applicable to The Project in this location. 7.2 Outline Code of Construction Practice (Revision C) GGO7 states: "Land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition discussed with the landowner), in line with the Outline LEMP (document reference 7.4). Hedgerows, fences, and walls (including associated earthworks and boundary features) will be reinstated to a similar variety to those that were removed, in discussion with the landowner and to the satisfaction of National Grid." The Applicant is not proposing to make the access from the A12 permanent. The list of permanent accesses is detailed in 6.4 Environmental Statement Chapter 4 Project Description [APP-130]
Transport and Traffic	Public Highway & Routing of Traffic 46. We note the intent to direct the vast majority of construction traffic destined for section D via the A134 through our village. This means that one road, which passes through the residential Chesterwell area before it enters our rural village, will bear the brunt of all the	The Applicant acknowledges Great Horkesley Parish's concerns on the proposed traffic assignment through the Parish where the construction route follows the A1341 (PAR 35) and then along the A134 (PAR 36) to the site access point (TB-B022 and TB-B023), as displayed on Figure 1 Sheet 18 7.11 Transport Assessment Appendix 1 Figures [APP-342]. The Applicant has assessed the suitable and feasible options available when proposing the routing of the Project Primary Access Routes (PARs). The identification of PARs and their specific mitigation measures have been produced for the anticipated construction vehicles associated with each location and developed iteratively through engagement with the Local Highway Authority, and public consultation feedback. This has included consideration of alternative available routes, and the relative suitability, sensitivity and practicality of each option. The Applicant is proposing a construction access strategy detailed in 7.3 Outline Construction Traffic Management Plan (Revision B), which routes construction traffic on Primary Access Routes (PARs) to site access points. From site access points, vehicles will then travel on the internal haul road.

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	very significant extra traffic generated for construction of haul roads, pylons (beyond our parish) underground trenching, sealing end compounds, and related infrastructure and landscaping, causing significant harm.	This is in line with EN-1 Policy to re-route vehicles away from congested areas of the network. The Applicant is proposing PAR 35 through Great Horkesley, connecting to the A12. An assessment on the impact to the local highway network is provided within 7.11 Transport Assessment [APP-333]. 7.11 Transport Assessment Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] indicates that the Applicant is proposing 74 LGV movements and 44 HGV movements along PAR 35 and PAR 36 in the AM and PM peak hours. This is an increase in total traffic of 10% during the peak hours during the worst-case construction peak period (one week). Outside of this peak construction period, the construction flows will be lower as shown in Image E.36 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has completed junction modelling on those junctions identified as sensitive based on existing congestion or potential capacity issues due to the increase in traffic as described within 7.11 Transport Assessment [APP-333] and 7.11 Transport Assessment - Appendix F - Junction Capacity Assessment [APP-339]. No sensitive junctions were identified on the A134 within Great Horkesley Parish. The Applicant has assessed the impact on the A1341/A134 junction (Site 44) in 7.11 Transport Assessment [APP-333]. The results indicate that the junction operates within capacity across all scenarios and time periods, with no significant delays under the worst-case peak construction period. The Applicant has assessed driver / public transport passenger delay along PAR 35 and PAR 36 in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] it was found there would be an increase in total daily traffic of 12% along the A134 (PAR 36) during the worst-case construction period (over a one-week period), which would be a significant effect on driver/passenger delay. The Applicant has noted the sensitivity of the A134 (PAR 36) and identified the following mitigation to minimise the significance of effects as a result of the Project as detailed within 7.3 Outline Construction Traffic Management Plan (Revision B):

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		- Updating the driver information pack to identify sensitive locations and warn drivers that pedestrians may be in the highway, walking either in the verge or carriageway; - Ensuring adjacent vegetation is maintained to keep verges and PRow access points clear and allow the full width of footway to be utilised; - Use warning signage to warn drivers of upcoming pedestrians crossing the carriageway. Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B) identifies that in accordance with mitigation measure GG30 in the 7.2 Outline Code of Construction Practice (Revision C), members of the community and local businesses will be kept informed regularly of the works through active community liaison. This is anticipated to include notification of heavy traffic periods which includes the worst-case peak construction period assessed and where mitigation is proposed. Image A16.4.36 in 6.16.4 Appendix 4 Traffic and Transport Construction Effects [APP-275] presents the construction flows on the A134 throughout the construction period. It can be seen that outside of this peak construction period, the construction flows will be lower.
Transport and Traffic	47. We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including: (i) Increased risk to pedestrians and cyclists, including school children who walk and cycle to the Trinity School in Chesterwell from the village along the A134 and pedestrians	The Applicant's assessment in 6.16.4 Appendix 4 Traffic and Transport Construction Effects [APP-275] details an increase in total traffic of 12% along the A134 (PAR 36) during the worst-case construction period with a duration of one week. Image A16.4.36 indicates the construction flow on the A134 throughout the construction period. Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B) identifies that in accordance with mitigation measure GG30 in the 7.2 Outline Code of Construction Practice (Revision C) members of the community and local businesses will be kept informed regularly of the works through active community liaison. This is anticipated to include notification of heavy traffic periods. During the peak construction period of one week, the Applicant is proposing an increase in 74 LGV movements and 44 HGV movements in the AM and PM peak hours along the A134 (PAR 36). Outside of the peak construction period, the construction flows will be

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	who need to walk along and frequently cross the A134 to and from amenities such as the primary school, village hall and recreation ground, and bus stops	lower as shown in Image E.36 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has assessed pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. This assessment considered the location of Trinity School accessed off of Primary Access Route (PAR) 36 - A134 Northern Approach Road/A134 Wildeve Avenue/A134 Nayland Road/A134 The Causeway. 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] notes that suitable crossing facilities are provided along PAR 36 and no significant effects on severance were identified due to the increase in traffic as a result of construction movements associated with the Project. For amenity and fear and intimidation, it was found that the significance of effects was large and deemed significant for pedestrians, cyclists and horse-riders and mitigation was therefore proposed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). This includes ensuring adjacent vegetation is maintained so the full width of footways are available, placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway and highlighting, within the driver information pack, areas where there may be a greater presence of pedestrians and cyclists along or crossing the A134 (PAR 36).
Transport and Traffic	[47. We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including:] (ii) traffic congestion	The Applicant is proposing a Primary Access Route (PAR) through Great Horkesley, connecting to the A12. The route follows the A1341 (PAR 35) onto the A134 (PAR 36) to the site access point (TB-B022 and TB-B023), displayed on Figure 1 Sheet 18 7.11 Transport Assessment Appendix 1 Figures [APP-342]. 7.11 Transport Assessment Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] indicates that the Applicant is proposing to route 74 LGVs and 44 HGVs along PAR 35 and PAR 36 in the AM and PM peak hours, for a peak duration of one week. Outside of the peak construction period, the construction flows will be lower as shown in Image E.36 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has completed junction modelling on those junctions identified as sensitive based on existing congestion or potential capacity issues due to the increase in traffic presented in 7.11 Transport Assessment [APP-333]. No sensitive junctions were identified on the A134 through Great Horkesley Parish. However, the Applicant has

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		assessed the impact on the A1341 Via Urbis Romanae / A134 Northern Approach Road (Site 44) south of the A12 as presented within Section 7.11 of 7.11 Transport Assessment [APP-333] . The results indicate that the junction operates within capacity across all scenarios.
Noise	[47. We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including:] (ii) noise and pollution	An Environmental Statement (ES) (Volume 6: Environmental Statement) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce noise effects. Environmental mitigation measures including those to mitigate noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the Development Consent Order (DCO) application, including 7.2 Outline Code of Construction Practice (Revision C) , 7.3 Outline Construction Traffic Management Plan (Revision B) , 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] . No significant noise effects other than at one property are predicted following the implementation of mitigation measures.
Transport and Traffic	[47. We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including:] (iii) inconvenience to our residents, representing as it does the main access from the Parish to Colchester and its local amenities, including the railway station, supermarkets, offices and secondary schools	The Applicant is a responsible developer who always has the communities they serve in mind. Therefore, they will seek to engage and work with the community to minimise disruption. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The chapter considers how the Project might potentially impact community facilities and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects on community facilities have been identified within Great Horkesley Parish Council. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives Development

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		Consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n.t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Transport and Traffic	[47. We are greatly concerned that the A134 will not be able to cope with the volumes of traffic caused and that this will cause significant harm including:] (iv) push local traffic away from the A134 onto unsuitable other local roads which will then be unable to handle the additional volume (including Boxted Road, Coach Road, and London Road). Many local roads are single-track countryside lanes with passing places unable to take a	Within 7.11 Transport Assessment [APP-333] the Applicant has assessed the likely impact on capacity at the A1341/A134 Junction (Site 44), south of Great Horkesley Parish. The modelling results indicate that the junction would operate within capacity during the AM and PM peak hours under the worst-case peak construction period, with no significant delays. Additionally, the Applicant has assessed the operation of the A134 Northern Approach Road / Boxted Road Roundabout (Site 45) which indicates that the junction would operate within capacity in the PM peak hour and is only marginally above practical capacity in the AM peak hour on the A134 (W) arm, with all other arms operating within capacity. The modelling results therefore indicate that local traffic along the A134 would not have a likely need to re-route away from their normal route / onto unsuitable local roads given the Project construction traffic can be accommodated without causing significant congestion and delay at these junctions. The assessment has considered the worst-case peak construction activity, and this will be temporary and over a short duration of one week as indicated on Figure 1 page 18 of 30 7.11 Transport Assessment Appendix 1 Figures [APP-342]. The construction routeing strategy is detailed within Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). This has been developed to

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	constant flow of traffic and bottlenecks will easily result.	manage the impact of construction vehicles on the Public Highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. An assessment of the suitability of each Primary Access Route was completed prior to prescribing each route to be used for HGV movements. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within 7.3 Outline Construction Traffic Management Plan (Revision B) which is secured through Requirement 4 of the 3.1 Draft Development Consent Order [APP-056] .
Transport and Traffic	48.We are also concerned that removal of street-furniture and traffic-islands will have a dramatic impact on the speed of traffic and on both road and pedestrian safety. Great Horkesley is a linear village centred along the A134. The pedestrian footways are located only on one side of the A134 and changes between being located on the West side, to the East Side, and to the West Side again. There are no pedestrian crossings and traffic islands are essential both for road calming and for providing pedestrian refuges.	Whilst APP-316 Indicative Highway Mitigation Plans indicate that a temporary modification is required to the traffic islands, the modification is associated with Abnormal Indivisible Load (AILs) movements. The Applicant is committed to maintaining safe pedestrian facilities, and crossings will be retained, with potential use of removable features that are only removed when AIL movements occur. The detailed designs for these changes shall be developed in consultation with the Local Highway Authority, and managed through the Local Highway Authority Permit Scheme. The Applicant is also proposing to temporarily reduce the speed on A134 The Causeway to 30mph, with additional temporary prohibition of vehicular overtaking, between TR-D-008 and TR-D-009 on Section D, Sheet 3 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [App 036]. The Applicant is proposing mitigation in Table 5.7 of 7.3 Outline Construction Traffic Management Plan (Revision B) for the A134 (PAR 36). This includes the embedded mitigation of the driver information management pack, highlighting locations where pedestrians are expected to be in the carriageway or on verges. The Applicant is proposing the following additional mitigation: - Ensuring adjacent vegetation is maintained to keep the verge clear. - Place signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway

Topic	Comment	National Grid's response
Transport and Traffic	49.We therefore suggest that the A134 be removed from your plans and replaced with access directly from the A12 via new temporary slip-road which you construct from the A12 at the point the route crosses the A12 between Colchester and Langham. If this is insufficient or if secondary access is required, we suggest that you investigate whether access can be gained via Colchester Park and Ride at Junction 28 of the A12, again avoiding use of the A134.	The Applicant has assessed the suitable and feasible options available when proposing the routing of the Project Primary Access Routes (PARs). The identification of PARs and their specific mitigation measures have been produced for the anticipated construction vehicles associated with each location and developed iteratively through engagement with the Local Highway Authority, and public consultation feedback. This has included consideration of alternative available routes, and the relative suitability, sensitivity and practicality of each option. The Applicant has assessed the suitability of PAR 36 on the A134 through Great Horkesley, and the proposed mitigation measures are presented in 7.3 Appendix C Indicative Highway Mitigation Plans [App-316]. The Assessments undertaken by the Applicant in 7.11 Transport Assessment [APP-333] indicate that the route is suitable, as noted in the responses above. The option for a new temporary construction access from the A12 has not been proposed. This is supported through engagement with National Highways and is supported by DfT policy (Strategic Road Network and the Delivery of Sustainable Development), which generally presumes against new connections for temporary access, and is considered applicable to The Project in this location.
Cumulative Effects	50.There is also the cumulative impact from new housing developments which will lead to a significant increase in construction traffic.	Great Horkesley Parish is within Colchester District and is located within Section D of the Project. An assessment of Cumulative Effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The assessments presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP 271] and 7.11 Transport Assessment [APP-333] have considered the cumulative effects on the highway network of the combined Project and other committed developments. Committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts.

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		The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 Inter-Project Cumulative Effects [APP-284] concludes that in Colchester, overall, negligible and not significant effects were assessed during construction and operation (and maintenance) for socio-economics, recreation and tourism, ecology and biodiversity, contaminated land, geology and hydrogeology, hydrology, flood risk and land drainage, health and wellbeing, historic environment, noise and vibration, and air quality. Moderate adverse significant effects could not be ruled out in relation to construction effects for landscape and visual, and Major adverse significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.
Transport and Traffic	51.It is unsuitable to route all this heavy traffic through residential areas and via junctions (such as VUR/Wildeve) which have very short filter lanes which will clog and cause congestion.	The Applicant has assessed the suitability of the Primary Access Route (PAR) proposed on the A134 through Great Horkesley (PAR 36). The Applicant identified the following junctions for assessment on the LRN (7.11 Transport Assessment [APP-333]): - A134 Northern Approach Road / A1341 Via Urbis Romanae - A134 Northern Approach Road/ Boxted Road Section 7.11 of 7.11 Transport Assessment [APP-333] presents the findings of the junction assessments along the A134. It was found that the Project construction traffic can be accommodated without causing significant congestion and delay at the junctions. The assessment has considered the worst-case peak construction activity, and this will be temporary and over a short duration of one week as indicated on Figure 1 Page 18 of 30 7.11 Transport Assessment Appendix 1 Figures [APP-342]. Outside of the peak hours and peak construction period, the construction flows will be lower. The Construction Routeing Strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B) and has been developed to manage the impact of construction vehicles on the Public Highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. An assessment of the suitability of each PAR was completed prior to prescribing each route to be used for HGV movements. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within 7.3 Outline Construction Traffic Management Plan (Revision B) which is secured through Requirement 4 of the 3.1

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		Draft Development Consent Order [APP-056]. The Project also requires the transportation of Abnormal Indivisible Loads (AIL). The Applicant has developed specific routing proposals for AIL movements and these have been developed with engagement by the relevant stakeholders including the Local Highway Authorities and National Highways. Details about these movements are submitted in support of the Development Consent Order (DCO) application in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310].
Transport and Traffic, Safety and Security	52. In the event that the current proposals are to proceed, and road safety features are to be removed, we ask that this be given specific consideration and detailed plans set out as to the maintenance of road calming and safety, including pedestrian crossing points and refuges.	The Applicant notes this comment. The Applicant is proposing to temporarily remove street furniture in a number of locations on the A134, to enable the safe movement of Abnormal Indivisible Load (AIL) movements (detailed in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section D [App-316]). The Applicant is committed to maintaining safe pedestrian facilities, and crossings will be retained, with potential use of removable features that would themselves only be removed when AIL movements occur (at such times, alternative management measures would be put in place). The detailed designs for these changes will be developed in consultation with the Local Highway Authority, and managed through the Local Highway Authority Permit Scheme. The Applicant is proposing to temporarily reduce the speed on the A134 The Causeway to 30mph, with additional temporary prohibition of vehicular overtaking, between points TR-D-008 and TR-D-009 shown on Section D, Sheet 3 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [App 036]. Additional controls, mitigation measures and monitoring for the impacts associated with the construction of the Project are detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). 7.3 Outline Construction Traffic Management Plan (Revision B) has been developed in consultation with Local Highway Authorities and Local Planning Authorities. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Essex County Council for approval post DCO consent.
Transport and Traffic	53. The underground section of the proposed route crosses the	At the crossing of the A134 The Causeway the Applicant proposes to install two temporary access points (TB-B022 and TB-B023) as well as the installation of the

Topic	Comment	National Grid's response
	A134, School Lane (twice) and London Road. It will not be possible to open-trench beneath these roads without serious disruption and cutting off half of the Village from substantially all access routes to Colchester. The A134 in particular is unsuitable for any road closure with no diversion route avoiding single-track lanes which are wholly unsuitable and, from experience, get insurmountably jammed in such event. It will therefore be essential that trenchless crossing methods such as directional drilling are employed to avoid disruption.	underground cable crossing. The Applicant has retained two methodologies to undertake the required works as set out in 3.1 Draft DCO [REP2-004], Schedule 5 and Schedule 8. The Applicant will continue to engage with the Local Highway Authority and affected stakeholders as detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). Following detailed design (post-DCO consent) it is anticipated that one methodology would be progressed, however a combination of both may be utilised if considered beneficial during engagement with the Local Highway Authority and affected stakeholders. Shuttle working would result in a longer impact on the highway when compared to a closure. The A134 The Causeway has been identified as too narrow to safely undertake the works with shuttle working alone so the carriageway would need to be widened if shuttle working was to be implemented. The proposed closure of the A134 The Causeway between TR-D-009 and TR-D-008, is detailed in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036]. The proposed closure is anticipated to be short term, expected to be for no longer than 4 weeks. The diversion route via lines SMD-D-007, SMD-D-008, SMD D-009 and SMD-D 010 as shown on 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036], Plan B. If the A134 works were to be completed using shuttle working, the works would typically be completed on one side of the road, while the other remains operational (using temporary control). The arrangement would then be swapped to the other side to complete the crossing. Where required the road would be widened up to one metre (remaining within the existing highway boundary). Where the roads have associated footways, these footways will be managed locally to enable access to be maintained throughout the works. In addition, the Applicant is proposing to temporarily close London Road, School Lane, Vinesse Road and Crabtree Lane, associated with the underground cabling works, due to the width of the carriageways. Road closures with diversions are anticipated to be no longer than 4 weeks. These are detailed in 7.3 Outline Construction Traffic Management Plan (Revision B), Section 5.8. The proposed diversions are detailed in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section D [APP-036] and are to be:

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		— London Road: Diversion route via lines SMD-D-015, SMD-D-012, SMD D-011, SMD-D-022 and SMD-D-023 as shown on Section D, Plan B. — School Lane: Diversion route via lines SMD-D-022, SMD-D-010, SMD D-021 and SMD-D 024 as shown on Section D, Plan B. — Vinesse Road: Diversion route via lines SMD-D-029, SMD-D-027, SMD D-026 and SMD-D 025 as shown on Section D, Plan B. — Crabtree Lane: diversion route via lines SMD-D-025, SMD-D-019, SMD D-029 and SMD-D 027 as shown on Section D, Plan B. As noted in Section 5.8.8 of 7.3 Outline Construction Traffic Management Plan (Revision B), where a diversion route is proposed, it will adopt the principle to follow the same standard of road, or higher where practicable and available. The Applicant is proposing to use temporary diversion signs, in accordance with the relevant signage design guidance. The Applicant is proposing to use the Permit Schemes managed by the Local Highway Authority for the coordination of the street works for the Project to minimise disruption. It is not expected that the road closures listed above will occur simultaneously. The project will adhere to these principles, the permit requirements and any resulting traffic diversions will be shown on the relevant county council online traffic map.
Transport and Traffic	Construction & Amenity 54.GHPC is also very concerned about the long core working hours for construction; far beyond what is reasonable. 55.In more detail: a. Great Horkesley is a rural Parish and our residents are greatly concerned by the impact of the proposals upon	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 07:00 to 19:00 • Saturday, Sunday and Bank Holidays/Public Holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order [APP-056] (draft DCO). The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters; this includes the core working hours for the construction phase of the Project.

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	their day-to-day lives from noise, pollution and road congestion, the amenity of the local area for walks including on the Essex Way in close proximity to the Eastern sealing end compound and underground route, and upon farming. b. The interests of local community and landowners / farmers must be put first ahead of National Grid's own convenience, even if that results in increased costs for National Grid. To ensure this the following mitigations and restrictions are essential: c. Construction: Timing, Operational Hours, Impact: In order to protect the local population from disturbance, working and vehicle movements must not ordinarily be permitted on Sundays or Bank Holidays, nor outside of the hours of 8am and 6pm on any work day without the	The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. 7.2 Outline Code of Construction Practice [REP2-014] (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction

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	further agreement of the Parish Council. Consideration as to reducing vehicular movements during peak traffic flow times should be given.	activities to minimise adverse impacts during the construction phase. The measures set out within 7.2 Outline CoCP [REP2-014] will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft DCO [APP-056] within the final CoCP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of 7.2 Outline Code of Construction Practice (Revision C), including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Regarding item 55a specifically – The Applicant has assessed the suitability of the Primary Access Route (through Great Horkesley), with detailed on the assessment captured in the above responses. The Applicant has not identified any instances of significant delays in the assessment undertaken in 7.11 Transport Assessment [APP-333]. Detailed in 7.3 Outline Construction Traffic Management Plan (Revision B) indicates that junctions which have no proposed mitigation are to be monitored throughout the construction period, instances where the junction is performing under current baseline conditions will be discussed when required. As a result, the Applicant does consider that peak hour restrictions are necessary in Great Horkesley.
Transport and Traffic, Land and property	d. Construction infrastructure: Compounds The set down and construction compounds located either side of the A134 are in extremely close proximity to local residential and listed buildings, including Grade II* listed Chapel Cottage, Grove House, and the cluster of other residences and listed buildings at that point. It would however	Access to residential properties during construction is secured through Commitments S02, S03, AS03 and GG30 of 7.2 Outline Code of Construction Practice (Revision C), which require access to be maintained where practicable, alternative access to be provided where necessary, and advance notification and liaison with affected residents. These commitments are enforced through Requirement 4 of 3.1 Draft Development Consent Order [APP-056], which requires approval and implementation of a final CoCP by the host local planning authorities. An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]. The

Topic	Comment	National Grid's response
	be easy to relocate such to mitigate the harm and disruption to residents caused by their visual blight and noise nuisance, and also reduce the visual impact of the scheme from the centre of the village at the A134. We would suggest that it will be easy to move such East behind farm buildings at TL 98185 31054 where it will have reduced visibility and noise nuisance to residents and beyond.	assessment provided indicates that no significant effects are expected in Great Horkesley in relation to noise and vibration from pylon construction with appropriate mitigation measures. Additionally, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. For Chapel Cottage (1222607) the assessment concluded a moderate adverse, and significant effect, during construction due to the disruption to the rural setting of the asset, and a neutral effect in operation (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) following reinstatement of vegetation as set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D).
Transport and Traffic	e. Haul Roads and Construction Vehicles: National Grid's plans call for construction of haul roads alongside the cable route, in many locations on both sides of the line. This will increase construction time, cost of construction, cost of land reinstatement, and result in	7.2 Outline Code of Construction Practice (Revision C) (CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] . Relevant commitments (AS01–AS03, GG06 and GG07)

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	greater damage to soils over a longer period. Construction of haul roads must be minimised to that which is absolutely necessary. Instead, agricultural vehicles with larger lower pressure tyres suitable for use on farmland should be used in place of traditional road-suitable construction vehicles. This will eliminate or reduce the need for haul roads and result in quicker, cheaper reinstatement of land together with better soil recovery. For the same reason the width of the construction swathe must be minimised. It is extremely close to residences and listed buildings at the A134 and along School Lane. We note that the recent water-main installation project from Bury St Edmunds to Great Horkesley successfully made use of agricultural machinery.	require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through CoCP Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order [APP-056].

Topic	Comment	National Grid's response
Historic Environment	f. As set out above, local listed and heritage properties are particularly vulnerable to vibration and located in very close proximity to the proposed haul road (especially near the A134 and along School Lane). Haul roads should be moved as far as possible away from residences and listed buildings and appropriate mitigation and monitoring undertaken.	6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Great Horkesley that would be impacted by vibration from the Project. Commitments NV01, NV02, NV03, NV04, NV05, and NV20 in 7.2 Outline Code of Construction Practice (Revision C) ensure measures will be put in place first to avoid impacts from vibration. NV04 provides a means to repair damage in the highly unlikely event it occurs. The pre-condition surveys committed to in NV04 are an important element to ensure there is a check against which any concerns regarding damage can be measured.
Transport and Traffic	g. Alternative Construction Methods: National Grid must investigate and wherever possible adopt new construction techniques such as 'cable ploughing' which are able to bury cables much more quickly and cause dramatically less damage to farmland, environment and ecology resulting in correspondingly faster recovery times.	The Applicant has identified four locations where underground cable is proposed to be installed. At Fairstead and Lower Thames Crossing the short distance and (at LTC) interaction with other works restricts the techniques. Elsewhere the Applicant can consider a number of techniques for cable installation. Our chosen method of AC cable installation is used to achieve the highest rating matching the overhead lines. There is very limited application of cable ploughing in Europe at high voltages. it is not established that the ratings required by this project could be achieved by such a technique for AC underground cables of 3465MVA per circuit.
Biodiversity, ecology and	h. Hedges: the removal of hedgerow should be minimised	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes the results of the hedgerow surveys undertaken over 2022-2025 and an

Topic	Comment	National Grid's response
nature conservation	to the greatest extent possible, ensuring that gaps created are wide enough only to allow access of machinery. They should be fully reinstated afterwards.	assessment of impact as a result of the Project. This hedgerow impact assessment is based on a reasonable worst-case scenario of hedgerow loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of hedgerow loss would be reduced and impacts to hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) as agreed with Natural England and Local Planning Authorities which includes reinstatement requirements. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain with wider environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment.
Water environment	i. Drainage: It should be noted that our Parish already has significant issues with regard to run-off and flooding after heavy rain on local roads (and on occasion ingress to local residences) and the impact of construction (including impacted soil) must be properly assessed.	It is acknowledged that areas such as these are susceptible to flooding in 7.9 Flood Risk Assessment [APP-331]. Information on flood history specific to this locality was provided by the Parish Council during consultation. A construction phase risk assessment is included within 7.9 Flood Risk Assessment [APP-331] for fluvial flooding, surface water flooding and groundwater flooding in Sections 4.8, 4.10 and 4.11 respectively. Section 4.10 addresses construction activities which could temporarily change existing land surface permeabilities, influence the rainfall runoff regime and disrupt existing land drainage regimes. A Drainage Strategy has also been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The Drainage Strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] also includes measures to help minimise impacts on the existing land drainage regime.
Historic Environment	Inspection	Noted, this is a matter for the ExA.

Topic	Comment	National Grid's response
	56.GHPC is concerned that when the inspectors visited the area, their route did not take them North enough along The Causeway and to the historic heart of the village where the route crosses the village and from where the sealing end compound and other infrastructure will be seen, and beyond where the National Landscape is located.	
N/A	Overall Position of GHPC It is the position of the Parish Council that: (1) We continue to believe that an Integrated Offshore Grid represents the best long-term interests of the UK as a whole. 2) The Norwich to Tilbury proposals would bring very significant harm to this parish, the listed buildings and landscapes within it, and to the Dedham Vale National Landscape / AONB.	Noted, detailed points are responded to by the Applicant above.

Topic	Comment	National Grid's response
	(3) The proposals fall outside of the requirements of local and National Policy NPS-EN5. (4) The EACN is in the wrong location and / or not required. (5) Regardless of which, National Policy requires that an alternative route be adopted, such as EAS1, ESO Alternative 5b or ESO Alternative 8, avoiding the Dedham Vale and this Parish entirely. (6) Alternatively, National Policy at the very least requires that the entire section of line between TB1 and TB41/2, or at least TB31/34 at Great Horkesley be undergrounded. (7) National Grid's argument that the cost of additional underground line in this area is not justified by reduction in impact to the Dedham Vale is not appropriate as firstly, cost is not a relevant argument in the terms of NPS-EN5 within this setting, and secondly because	

Topic	Comment	National Grid's response
	in the terms of NPS-EN5 even residual impact is unacceptable in planning terms.	
	(8) The use of underground HVDC technology, as proposed by ESO in Alternative 8, would represent a far better approach to this problem and should be employed for the whole project as it would afford protection to the whole line including significant improvements within the areas already proposed to be underground due to the significantly narrower trenches and working space requirements.	
	(9) If it still exists, the Sealing End Compound at Great Horkesley must be in another location further to the East and sited further from the national landscape/AONB and in less visible areas in conformity with the Horlock and Holford rules. Wherever the Sealing End Compound is located it must be fully screened with tall native	

Topic	Comment	National Grid's response
	tree species such that it cannot be seen from any listed building or in any direction from or into the Dedham Vale. Its visual blight is significant due its sheer scale and height. (10) The set down and construction compounds located either side of the A134 must be located away from residential and Listed Buildings. Where possible, these should be located near to farm buildings or other commercial activities to minimise disruption to residents and suggest that it will be easy to move such East behind farm buildings at TL 98185 31054 where it will have reduced visibility and noise nuisance to residents and beyond. (11)The A134 should not be used to carry the majority of construction and other traffic for the project in section D and proper consideration ought to	

Topic	Comment	National Grid's response
	be given to alternative, direct, routes from the A12 to reduce the significant harm that would otherwise occur; in any event appropriate measures must be taken to maintain public safety. Further, road closures should be avoided, especially on the A134, during construction (and trenchless crossing technology utilised).	
	(12) The hours of operation for both construction and vehicle movements must be reduced avoid Sundays, bank holidays and evenings.	

2.30 Great Tey Parish Council

2.30.1 Table 2.30 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Great Tey Parish Council [RR-1315]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.30 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Needs Case	Great Tey Parish council are submitting a formal representation on behalf of their residents. This is in support of the representation made by Colchester City Council. Great Tey Parish council wishes to make clear its strong objections to the proposed Norwich to Tilbury pylon scheme. Our Parishioners have formulated detailed arguments highlighting the destructive effect this proposal will have upon the community, environment, and surrounding areas. While we accept the need to move power from the North Sea to London, we object to the National Grid’s Norwich to Tilbury pylons proposal. This objection is based on: The arguments set out in consultation responses	The Applicant notes the respondent’s feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review [APP-355]), and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]).

Topic	Comment	National Grid's response
	submitted by this Parish Council in 2022 and 2023. The submissions of the Essex Suffolk Norfolk Pylons Action Group, including to this Statutory Consultation, which we endorse.	
Consultation	Concerns Regarding Consultation Consultation has been, and remains, inadequate. Previous consultation responses appear to have been ignored.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .
Alternatives	Valid alternatives have not been presented.	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357] , with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to

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		2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Needs Case	The harm of National Grid's preferred solution significantly outweighs the benefits.	The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands. The need case in Section 3 'Need Case' and Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP-355] clearly states the existing system capabilities and the amount of energy that is expected to transfer across system boundaries. National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible.
Alternatives	Supported Alternatives Great Tey Parish Council supports the following alternatives: A fully integrated offshore grid. HVDC transmission from Norwich to Tilbury, either underground or subsea. The subsea option includes a platform for Five Estuaries and North Falls, which we welcome.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Biodiversity, Ecology and nature conservation	Key Areas of Concern Environmental Damage Loss of natural habitat, hedgerows, and resident wildlife. Long-term disruption to footpaths,	The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental

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	bridleways, and lanes. Destruction of treasured landscapes, views, and sunsets. Harm to birdlife, including growing populations of Red Kites and Buzzards. Loss of ancient woodland and substantial trees within the 40-metre swathe.[...] Removal of tree cover along Salmons Lane.	Statement [APP-123 to APP-287]) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. <i>Ecology</i> The area around Great Tey has been subject to a full range of ecological surveys over 2022–2025. These surveys have included habitats, hedgerows and birds, and the results and assessment of impacts on ecological receptors are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the associated ecological appendices. Impacts on trees and hedgerows, amongst other ecological features, will be refined further at detailed design stage. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. The Applicant can confirm there will be no residual impact on ancient woodland or any other ecological receptor following the implementation of appropriate mitigation measures. Commitment GG14 in 7.2 Outline Code of Construction Practice (Revision C) confirms that following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable. Vegetation management along Salmons Lane is associated with visibility splays for the proposed bellmouth crossing points. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits. <i>Public Rights of Way</i>

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		With regard to Public Rights of Way (PRoWs), the overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Within the Parish of Great Tey, Footpaths Great Tey 38, 50, 59, 36, 42 and Bridleway 46 will require a temporary diversion, for indicative durations ranging between 1 day and 15 weeks, depending on the construction activities at each location. Footpaths Great Tey 44 and 45 will remain open on their existing alignments throughout construction, with access managed as required at points where they interact with construction activities, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan. All PRoWs temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The impacts of construction on PRoWs including diversions and closures have been assessed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] taking account of the overall strategy set out within 7.6 Outline Public Rights of Way Management Plan [APP-329]. The findings of the assessment are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. No significant effects on users of PRoWs were identified where access to PRoWs would be maintained along their existing alignment and managed. Where PRoWs would be temporarily closed with a diversion provided an assessment was undertaken on the net increase in distance and judged against the length of time the diversion would be in place. Footpath Great Tey 38 was found to have a notable increase in distance and would be in place for a two-month duration and therefore identified as having a significant impact on users of the PRoW. Although this is a leisure route, the increase in walking distance may not necessarily result in any adverse effects to users. <i>Landscape and visual effects</i>

Topic	Comment	National Grid's response
		Effects on visual receptors within Great Tey Parish are set out under Visual Receptor Areas (VRA) D7 Fordstreet and Aldham, D8 Great Tey, D9 Marks Tey, E1 Coggeshall and E2 Rivenhall in Sections 13.7 and 13.8 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Great Tey Parish are set out under LCA B4: Gosfield Wooded Farmlands in paragraphs 13.3.637 to 13.3.653, LCA B4: Great Tey Farmland Plateau in paragraphs 13.3.573 to 13.3.588 and LCA B2: Easthorpe Farmland Plateau in paragraphs 13.3.589 to 13.3.603 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228]. Significant effects have been identified on landscape and visual receptors within 1.5 km of the Project in these areas. The assessment of construction effects on visual receptors recognises that some vegetation removal would occur within the VRAs and LCAs, including along Salmons Lane. The Environmental Statement is based on an assumed worse-case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236].
Biodiversity, Ecology and nature conservation	Impact on Sites of Scientific Interest.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as designated sites (i.e. Sites of Special Scientific Interest (SSSIs)). The Project has therefore avoided direct impacts on all SSSIs across the whole Project. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the potential indirect impacts on SSSIs. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice and mitigation measures to avoid or reduce impacts on SSSIs. The Applicant can confirm there would be no significant residual effects on SSSIs following the implementation of mitigation measures.
Socio-economics Recreation and Tourism	Community and Business Impact Road closures will disrupt local businesses and parishioners.	Socio-economic impacts on businesses within the study areas are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be no significant adverse effects on businesses within Great Tey Parish Council as a result of the Project. In addition to the Environmental Statement, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The government has

Topic	Comment	National Grid's response
		published its guidance on community funds for transmission infrastructure³⁹. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the Environmental Impact Assessment.
Transport and Traffic	Safety risks from increased traffic on small country lanes, as seen during recent National Highways projects. Retained access rights for future maintenance will cause repeated disruption.	The Applicant has developed a construction routeing strategy, as set out in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. From these site access points, traffic will be routed off the public highway along the internal haul road to access the construction sites. No prescribed Primary Access Routes are proposed to run directly through the village of Great Tey. The closest Primary Access Route is proposed to the south of Great Tey, along an approximate 875 m section of Great Tey Road (PAR 39) from the A120. This is displayed on page 20 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. As noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], in the AM and PM peak hours, the Project is anticipating a peak of 20 construction traffic vehicles (14 HGV and 6 LGV) for a duration of 3 weeks along this section of Great Tey Road (PAR 39). Outside of this peak construction period, the construction flows will be lower as shown in Image E.39 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. Therefore, magnitude of impact outside of the worst-case peak period will be lower. As noted in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], operational and maintenance activity would require a limited workforce. During operation (and maintenance), the Applicant would require infrequent access to ensure the

³⁹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
		operational Project is appropriately surveyed, assessed, and maintained. Access would typically be made by foot, 4x4 or tractor and trailer which would not cause disruption on local roads.
Landscape and Visual	Winching compounds required along the route will scar the landscape.	The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, including as a result of construction activity. The effects are explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The Applicant has developed its proposed locations of construction compounds, substations and Cable Sealing End (CSE) compounds in line with its duties, the practicalities of construction and informed by guidance such as the Horlock Rules. The location and configuration of such sites have also been modified in some instances responding to feedback from consultation and surveys. The details of why some changes were made, and other requested changes were not are set out in 5.15 Design Development Report [APP-122] and in 5.1 Consultation Report [APP-066].
Noise and Vibration	Noise and disturbance during construction will affect residents and wildlife.	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] which was undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The assessment provided indicates that no significant effects are expected in Great Tey in relation to noise and vibration from pylon construction with appropriate mitigation measures. Additionally, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the 7.2 Outline Code of Construction Practice (Revision C). Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). Indirect effects on ecological features (such as bats and birds) arising from the noise of temporary construction elements (i.e. haul roads, access tracks, temporary construction

Topic	Comment	National Grid's response
		compounds) and/or operational use of permanent assets (i.e. substations, CSE compounds, permanent access roads for substations/CSE compounds) are assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No significant residual effects on ecological features as a result of construction or operation (and maintenance) noise have been identified.
Historic Environment	Heritage and Amenity Impact on historic buildings and monuments: St Barnabas Church (Grade I Norman Church) within 1,500 metres. St James the Less in Little Tey (Grade I listed) within 400 metres.	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets within Great Tey Parish. The Project would not result in any substantial harm to designated heritage assets. The Applicant has reviewed the assessment of the Church of Saint Barnabas considering the respondent's comments. The church is located within its associated graveyard, which is defined by a low wall and contains scattered mature trees and shrubs. There are clear views from the church to the surrounding village streets. The surrounding village streets are largely residential with defining mature tree lined hedgerows. Due to the tree cover in the village, overall distance, and screening by the topography, mature tree lined boundaries, and copses in the intervening landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. The Applicant has reviewed the assessment of the Church of Saint James the Less considering the respondent's comments. The Project would be partially located within the setting of the asset. The church is located within its associated graveyard, which is defined by a hedgerow and contains scattered mature trees. There are residential properties immediately to the west and north-west and off Church Lane which itself is defined to the west by a mature tree lined hedgerow. Due to some screening by the mature vegetation of the graveyard, in the gardens of the residential properties, lining Church Lane and in the intervening landscape, the Project would only be occasionally visible. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent low adverse significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate.

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		Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Transport and Traffic	The Essex Way public footpath passes within 50 metres of the route, undermining its role as a showcase for Essex. Bracks Lane in Broad Green, an Essex Green Lane, will be directly under the proposed cables with a pylon within 50 metres. Visual amenity of houses along East Gores Road will be impaired. Landscape views from East Gores Road and the Kings	Protected Lanes are also included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and assessed following the methodology set out in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. Detailed assessment is presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Applicant acknowledges the concerns regarding Quiet Lanes and the construction vehicle routeing has been designed to minimise impacts across the highway network, as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). When developing the proposed construction access routes (Primary Access Routes), sensitive receptors were considered. There is no proposed interaction with Quiet Lanes except for at crossover points, with vehicles associated with construction not travelling along Quiet Lanes. There are two instances where Quiet Lanes are used as a vehicle crossover point

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	Arms Public House (with rooms) will be impacted.	between two proposed site access points, to allow construction vehicles to continue along the haul road. These locations are: • Millway Lane (Palgrave) Crossover Point for bellmouth RG-B061 • Tye Lane (Bramford) Crossover Point for bellmouth RG-B115. The impacts will be temporary during the construction phase, and mitigation measures will be put in place to minimise any potential impacts; see 7.3 Outline Construction Traffic Management Plan (Revision B). There are a couple of instances where Quiet Lanes may need to be closed for the overhead line conductor stringing and associated scaffold crossing protection. The closures are anticipated to be short term in nature. Socio-economic impacts on businesses within defined Study Areas are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The assessment concludes that there would be no significant adverse effects on businesses within Great Tey Parish Council, including The Kings Arms Broad Green, as a result of the Project. Effects on the Essex Way are set out within Section 13.12: Assessment of Effects on Routes in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The Applicant acknowledges that there would be significant effects on users of the Essex Way, which would range from major and significant (adverse) to minor and not significant (adverse). Effects on visual receptors within Great Tey Parish are set out under Visual Receptor Areas (VRA) D7 Fordstreet and Aldham, D8 Great Tey, D9 Marks Tey, E1 Coggeshall and E2 Rivenhall in Sections 13.7 and 13.8 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Great Tey Parish are set out under LCA B4: Gosfield Wooded Farmlands in paragraphs 13.3.637 to 13.3.653, LCA B4: Great Tey Farmland Plateau in paragraphs 13.3.573 to 13.3.588 and LCA B2: Easthorpe Farmland Plateau in paragraphs 13.3.589 to 13.3.603 of 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228]. Bracks Lane in Broad Green is located within VRA D9 Marks Tey, East Gores Road is within VRA D8 Great Tey and the Kings Arms Public House is within VRA D9 Marks Tey and VRA E2 Rivenhall. Significant effects have been identified on visual receptors within 1.5 km of the Project in these

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		VRAs. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Two properties along East Gores Road (Tye Cottage and Anahata Cottage) are expected to experience a high magnitude of visual change as a result of the Project. However, overall, the RVAA concludes that the effects on residential visual amenity at these locations would not be so great that they would breach the Residential Visual Amenity Threshold (RVAT), as explained in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment⁴⁰. It is noted that some properties / property groups along the Project route do come close to this threshold and that mitigation measures have been recommended to reduce effects.
Transport and Traffic	Social and Economic Harm At least three years of disruption during construction, plus further time to remove compounds and access points.	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). 7.3 Outline Construction Traffic Management Plan (Revision B) highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project. The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333]. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse riding modes on the roads along the Primary Access Routes located in the Local Road Network. 7.11 Transport Assessment [APP-333] submitted with the Development Consent Order application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns.

⁴⁰ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

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		Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] concludes that there would be no significant adverse effects on the tourism economy across the Project, including in Great Tey, during construction as a result of the Project. The tourism economy effects during operation (and maintenance) were scoped out of the assessment as set out and agreed in 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297].
Land and property	Predicted house price reductions of up to 40%. No mention of compensation for residents, particularly those outside the red line ("Offline houses").	It is understandable to have concerns about property values regarding new infrastructure proposals near homes; however, there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, and national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beauldy-Denny 2024 report was commissioned by Scottish Renewables and conducted by BiGGAR Economics⁴¹. The report focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers, and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: House prices in affected areas (Highland, Perth and Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauldy-Denny power line

⁴¹ BiGGAR Economics (2024) *House Prices: Impact of Beauldy-Denny Grid Infrastructure*

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		Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Health and Wellbeing	Potential long-term health risks for residents living within 50 metres of pylons (electromagnetic fields).	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing electric and magnetic fields (EMFs), which are incorporated into the decision-making process for development consent in National Policy Statement (NPS) EN-5 (2024). These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. As well as exposure limits, the introduction of 'corridors' or restrictions on proximity of homes to overhead lines and other precautionary measures in respect of exposure of people to EMFs has been considered by government. In 2009, the outcomes of the Department of Health's established Stakeholder Advisory Group to Government on Extremely Low Frequency Electric and magnetic fields (SAGE) were published. The aim of the process was to bring together a range of stakeholders, to identify and explore the implications for a precautionary approach to Extremely Low Frequency EMF and make practical recommendations for precautionary measures. The government adopted several of the recommendations SAGE had made for precautionary measures. Those measures specific to high voltage power lines include 'optimal phasing' of power lines and providing more advice on EMFs. Other precautionary measures, specifically the introduction of corridors around new and existing overhead lines, were considered but were judged to be disproportionate in light of the scientific evidence and were not adopted. The government-adopted precautionary measures are included within NPS EN-5. All the infrastructure proposed as part of this Project complies with the requirements of NPS EN-5 and evidence of compliance is available in the 7.8 Electric and Magnetic Field Compliance Report [APP-330].

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Good Design	Damage to sewerage systems (cess pits, soakaways) and water supplies (recent test drilling caused closure of East Gores Road for five days). Existing utility lines under pylons should be undergrounded.	The Applicant undertakes regular utility searches to understand where such sewerage systems and water supplies are located and will undertake further site-specific location exercises prior to excavation and ground penetration activities in line with best practice. The Applicant is engaging with third-party utility asset owners to underground assets where required. The scope of such undergrounding is allowed for within 3.1 Draft Development Consent Order (Revision C).
Alternatives	Subcontractors may be less communicative than National Grid, leaving parishioners and councillors without adequate support.	The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance⁴². The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.

⁴² Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
Alternatives	Example: Pylon 067 to 068: The new pylon lines will fly over existing phone and electricity lines which will need to be undergrounded. Pylon 068 will be right in the view of the houses along Salmons Lane. Please can you extend the under grounding of the existing lines as marked on the map below, as mitigation for the damage caused to residents of the lane by the new pylon lines? This has been discussed with National Grid's Simon Pepper at in person consultation event and he has acknowledged it as a practical possibility. There are existing lines both in front of and behind the houses, and Fisher German have visited residents to discuss. Pylon 069: in early drafts this pylon was to be located to the West of the Bracks Lane footpath, but it was later moved to the East, where it is in full view of the new rooms built at the Kings Arms Pub This pub is considered to be a village asset but is currently struggling. It is therefore reliant on the income generated from its rooms.	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents. Individual responses are set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360). 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266] assessed the potential effects on businesses within the 3 km Study Area. The assessment concluded that a minor adverse effect (not significant) is anticipated on the Kings Arms Broad Green during construction and operation. These considerations include the potential visual amenity impacts, while land take or access disruption to the business is not anticipated during construction or operation (and maintenance). Effects on visual receptors in the location of pylons 067 to 068 (assumed to be TB67 and TB68) are set out under Visual Receptor Areas (VRA) D8 Great Tey and VRA D9 Marks Tey in Section 13.7 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant effects have been identified on visual receptors within 1.5 km of the Project in these VRAs, which includes receptors at the Kings Arms Pub and residents in Broads Green and East Gores. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. The Applicant notes the respondent's feedback. TB69 was moved between the 2023 non-statutory consultation and the statutory consultation. Due to long spans between pylons in this section, to move TB69 back to the west of the hedge would require taller pylons and therefore would increase visual impacts. Therefore, the current location of the pylon is preferred, and no change has been made.

Topic	Comment	National Grid's response
	Therefore, if the scheme has to proceed please could Pylon 069 be moved back to its original position to the East of Brack's Lane?	
Alternatives	Conclusion It is inconceivable that in 21st century Britain such outdated technology should be inflicted on communities, causing financial hardship, unnecessary stress, and permanent damage to our landscape, environment, and heritage.	The respondent's view is noted; however, the Applicant must work within the confines of the relevant policy which is the current National Policy Statement EN-5 (2024). This policy makes clear that: <i>'the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated Landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)'</i> (paragraph 2.9.20). The majority of the Applicant's existing transmission network is constructed from pylons and overhead lines; these are a demonstrated and reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example, with regard to climate change) would need to be applied to the entire network. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project. These included an offshore connection using direct current technology, and various onshore connection options including: increasing operational voltages on the existing network to above 400 kV; alternating current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; high voltage direct current (HVDC) overhead line and underground cables; and gas insulated line. Currently, overhead lines offer the most economic and efficient solution to transmit electricity over long distances.
N/A	Great Tey Parish Council, on behalf of its parishioners, strongly objects to the Norwich to Tilbury pylons proposal. We urge National Grid to:	Noted. The Applicant has responded to detailed points of objection above.

Topic	Comment	National Grid's response
	Completely reconsider the current plans. Adopt modern, sustainable alternatives such as an integrated offshore grid or HVDC transmission. Seek solutions that protect communities, landscapes, and heritage while meeting the energy needs of future generations.	

2.31 Higham Parish Meeting

2.31.1 Table 2.31 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Higham Parish Meeting **[RR-1421]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.31 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	As a Parish meeting we are writing to formally object to the proposed Norwich to Tilbury pylons Development Consent Order.	Noted.
Landscape and Visual	Our primary concern is the massive and irreversible damage that the undergrounded trenches will cause to Higham Village and the Dedham Vale National Landscape, areas of significant natural beauty and cultural importance. Our village has a Conservation Zone and sits within the National Landscape, both of which will be affected by the visual intrusion of large pylons on the horizon. The trench through our village will forever destroy the character and tranquillity of this cherished location.	The Applicant acknowledges the concerns relating to undergrounding, which have been considered as part of the assessment of landscape and visual effects. Effects on visual receptors within Higham Parish are set out under Visual Receptor Areas (VRAs) C6 Raydon and C8 Higham in Section 13.6 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant visual effects are identified on visual receptors within 0.5 km at construction. The village of Higham and the National Landscape are located within this distance. Effects would reduce to not significant at operation. Effects on landscape receptors within Higham Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under LCT Valley Meadowlands in paragraphs 13.3.282 to 13.3.295, LCT Rolling Valley Farmland in paragraphs 13.3.296 to 13.3.310 and LCT Plateau Farmlands in paragraphs 13.3.322 to 13.3.336. Significant landscape effects are identified on receptors within 0.5 km on Valley Meadowlands LCT and Plateau Farmlands LCT and within 1.5 km on Rolling Valley Farmland LCT at both construction and operation. Construction activity associated with undergrounding, including the digging of trenches, has been considered within the landscape and visual construction assessments. The Project is designed to minimise effects on Dedham Vale National Landscape in accordance with National Policy Statement EN-1 (2024), including consideration of the Project within the National Landscape and its setting. An assessment of effects on the

Topic	Comment	National Grid's response
		special qualities of the Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment is based on the Project design as described in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The assessment concludes there will be significant effects on the special qualities of the National Landscape during construction. Once the Project is operational and the land has been restored, effects on special qualities will gradually reduce (as the landform and vegetation cover is restored), such that they will not be significant. The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of the Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant has reviewed the assessment of the Higham Conservation Area considering the respondent's comment. The conservation area is focused on the B1068 and short sections of Higham Road and Hadleigh Road. These thoroughfares are lined with a scattering of listed buildings and by non-designated buildings which contribute to the character of the conservation area. The majority of properties are one plot deep, so that the countryside is immediately to hand at the rear of most properties, although many of the garden plots contain or are defined by mature tree lined hedged boundaries. The surrounding rural landscape cannot be seen from the centre of the conservation area due to topography and the streetscape, which is lined with well-established mature hedgerows and trees. The setting of the conservation area is, therefore, confined to the streetscape of the village and the immediate rural landscape and the assessment concluded that the setting of the asset does not extend to the Order Limits so there would be no impact from the Project. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate.
Alternatives	Furthermore, we strongly believe that there are far less harmful and more modern alternatives available that have	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity

Topic	Comment	National Grid's response
	not been adequately considered for this project. These include the use of HVDC underground cables, offshore coordination, and upgrading the existing electrical grid with the most up-to-date technology. Such alternatives would avoid the environmental degradation and blight caused by overhead lines and miles of underground trenching.	network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant NPS EN-5 (2024) paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 (2024) and EN-5 (2024) policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault.

Topic	Comment	National Grid's response
Historic Environment		Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
	In the case of the Dedham Vale, the trenching passes through known Roman settlement sites	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Higham Parish. The Project would not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. The Applicant is aware of the archaeological potential of Higham Parish, and this potential has been assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070].

Topic	Comment	National Grid's response
		The desk top assessment has been supplemented by geophysical survey (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072, AS-074, AS-076]) and archaeological trial trench evaluation (6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]). In addition to the proposals in the 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the archaeological remains identified in Higham Parish. Following the implementation of mitigation there would be no significant effects to archaeology within the Parish. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development.
Water environment	[In the case of the Dedham Vale, the trenching passes through] a centuries old flood plain and river bed.	The Applicant acknowledges that the Project crosses the River Stour and its floodplain. The river is a receptor included in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and is addressed in 7.9 Flood Risk Assessment [APP-331]. 7.9 Flood Risk Assessment [APP-331] addresses the Stour valley, flood defences along the Stour, flood history, floodplain and measures that will be in place to reduce effects on the River Stour. It is proposed that the River Stour would be crossed by a trenchless crossing to reduce effects on the River Stour during construction. A Flood Warning and Evacuation Plan (7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]) would be in place for construction works within the floodplain. Further detail on the measures that would be in place are provided in 7.2 Outline Code of Construction Practice (Revision C).
N/A	In conclusion, the damage to Higham Village and Dedham Vale is unacceptable and completely avoidable. We join many other communities along	Noted, the Applicant's response to the detailed points of the RR is provided above.

Topic	Comment	National Grid's response
	the Norwich to Tilbury route in urging the Planning Inspectorate to reject the Development Consent Order for these pylons and insist on solutions that respect our Nationally significant landscapes and treasured village hamlets.	

2.32 Hintlesham and Chattisham Parish Council

2.32.1 Table 2.32 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Hintlesham and Chattisham Parish Council **[RR-1430]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.32 Comments and National Grid's response

Topic	Comment	National Grid's response
Objection	Please find below the initial comments from Hintlesham & Chattisham Parish Council for registration as an Interested Party in OBJECTION to the submitted proposal by National Grid.	Noted.
Landscape and Visual / Alternatives	The mitigation hierarchy is a core principle referenced throughout the National Policy Statements, including EN-1 and EN-5, which apply to NGET's Norwich to Tilbury proposal. The application should therefore be expected to demonstrate adherence to these principles at overarching project level and with regard to impacts experienced by local communities. This application falls short in both regards. At project level it fails to demonstrate that the significant visual impact of an overhead line cannot be	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement (NPS) EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant has set out how the mitigation hierarchy has been applied to the Project in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and other application documents including the 5.6 Planning Statement [APP-085]. Whilst compensation is part of the mitigation hierarchy, NPS EN-1 (2024) and NPS EN-5 (2024) do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 confirm that residual landscape and visual

Topic	Comment	National Grid's response
	avoided by using an alternative solution which would be equally compliant with the regime decided by the regulator (Ofgem) and recommendations made by the system operator (NESO). If avoidance cannot be achieved, the application fails to consider simple and financially insignificant modifications at local level that would help to provide mitigation. This flawed assessment is aggravated by errors of fact relating to property identification, conflicts due to lack of coordination between disciplines and incomplete information. Mitigation might become evident when the project is underway, such as through slight changes in position and alignment of assets, but the application mostly denies the need for such mitigation and gives no undertaking to seek such mitigation in relation to specific, identified impacts. On the basis of past experience there is nothing to suggest the applicant's 'goodwill' might be	effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines <i>'and the impossibility of full mitigation in these cases does not countermand the need for overhead lines'</i>. It is particularly noteworthy that none of the policies on landscape and visual effects in EN-1 or EN-5 expressly mention compensation. This is in contrast to the other NPS policy sections, e.g. on biodiversity, where the provision of compensation is expressly referred to. The residual landscape and visual effects that remain following the application of the mitigation hierarchy therefore fall to the planning balance in accordance with the EN-1 and EN-5 policy framework, including the further critical national priority presumption in Section 4.2 of EN-1. The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. There is no requirement under the said Regulations for all residual effects to be compensated. The above aligns with the Bramford to Twinstead Development Consent Order, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects. It is not clear what the Parish Council is specifically referring to regarding a 'flawed assessment' and 'errors of fact'.

Topic	Comment	National Grid's response
	sufficient, or that verbal undertakings will be fulfilled.	
Needs Case	The need case; The need case is reviewed in the Strategic Options Backcheck and Review (APP-355 & APP-357) as well as options in APP-127 6.3 Environmental Statement Chapter 3 -Alternatives (Final Issue A) These documents do not consider the ESO (East Anglia) Network Study of March 2024. This study indicated that an underground HVDC solution – Option 8 – could be economically comparable to the proposal adopted by NGET (ESO Option 3). NGET's response of April 2024 sits outside the application and is dismissive, providing and allowing for no further investigation. The need case is therefore incomplete This same document states: "... stakeholders and the public are consulted during the	The needs case in Section 3 'Need Case' Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP-355] clearly states the existing system capabilities and the amount of energy that is expected to transfer across system boundaries. There are limitations as to what a circuit can carry, and these are defined by the International Electrotechnical Commission, who set ratings for 420 kV transmission, of 5,000 amperes being the highest available equipment. This equates to: • A capacity on a single circuit of 3,465 MVA (megavolt-ampere) • A double circuit of 6,930 MVA • And where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA. The current post-fault capacities are: • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW. Option 8, page 42, within the Electricity System Operator (ESO) East Anglia Network Study⁴³ (ESO is now the National Energy System Operator (NESO)), evaluates an option with 2 x 2 GW high voltage direct current (HVDC) links starting in Norwich and a 2 GW link starting from Friston. As shown above, EC5N, which is the boundary between Norwich and Bramford, requires the ability to manage capacities greater than 6 GW in the near term. Therefore, an option where all HVDC connections do not start at Norwich would not meet this need. Therefore Option 8 does not meet the need. The Applicant has undertaken an appraisal of an option set out as Section 14 'Offshore 1 – Norwich to Tilbury' pages 101–108, in 7.17 Strategic Options Backcheck and Review [APP-355]. This option looked at three sets of 2 GW (6 GW) links from Norwich to Tilbury Substation as a less optimal solution that does not connect Bramford or generation at a capital cost of £4,096.50 million.

⁴³ ESO (2024) *ESO East Anglia Network Study*

Topic	Comment	National Grid's response
	proposed project's evolution allowing for feedback to have influence in the development of the location, design and mitigation proposals for our schemes." (Transmission response to the ESO East Anglia Network Study page xxxxx) Without detailed review of Option 8 in the ESO study the applicant therefore fails to meet its own undertaking to allow feedback to have influence on the project.	The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 (page 108) of 7.17 Strategic Options Backcheck and Review [APP-357] states: <i>'Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m)'.</i> Therefore, the equivalent to the Applicant proposal would be Offshore 1 – 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10 million (£5.3 billion). In comparison, the (ESO) NESO Option 8, which does not meet the need case on the EC5N boundary, has a capital cost of £4.9 billion. The Applicant has also undertaken recent work to show that the cost of HVDC cabling has lower cost in marine environments where a cable laying vessel can carry up to 100 km of HVDC cable in one operation, compared to onshore HVDC undergrounding where circa 1 km of cable can be delivered via road transport at a time. This leads to costs being 1.6 times higher for HVDC land installation than the offshore alternatives set out by the Applicant and not considered in the NESO report. The Applicant has shown the lowest cost alternative that meets the need case set out in Section 3 'Need Case' Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP-355]. That is the option most equivalent to NESO Option 8, but meets the need as described above.
Socio-economics, Recreation and Tourism	Along the proposed length of an overhead line from the Bramford substation to the undergrounding location at Wenham there are communities that will suffer severe impact.	The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter considers how the Project might potentially impact local economy, local employment, tourism economy, community facilities, businesses, recreational and tourism activity and identifies potential mitigation measures where appropriate to reduce

Topic	Comment	National Grid's response
		negative impacts. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors located within Hintlesham and Chattisham Parish Council in the assessment. Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. No significant health and wellbeing impacts have been identified for the Hintlesham and Chattisham communities. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance⁴⁴. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.

⁴⁴ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
N/A	It is clear that the current National Grid proposal is contrary to the established Mitigation Hierarchy. Hintlesham & Chattisham Parish Council supports the Essex Suffolk Norfolk Pylon Campaign and reserves the right to submit further detailed comments during the examination.	Please see the response to the second row of this table.

2.33 Ingatestone and Fryerning Parish Council

- 2.33.1 Table 2.33 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Ingatestone and Fryerning Parish Council **[RR-1485]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.33 Comments and National Grid's response

Topic	Comment	National Grid's response
Planning policy	Representation by Ingatestone & Fryerning Parish Council Ingatestone & Fryerning Parish Council wishes to register a formal objection to the above application and to make the following representation. Summary of objection: We recognise the national need to upgrade electricity transmission infrastructure. However, we strongly oppose the proposed use of overhead transmission lines supported by large lattice pylons through Ingatestone & Fryerning parish and the surrounding landscape.	Noted.
Landscape and Visual	The proposed 50-metre lattice structures would cause unacceptable and irreversible harm to the character, views and heritage of the Wid Valley and adjacent areas.	The Applicant notes the concerns raised. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. The term 'Harm' is not reported on in a LVIA, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment

Topic	Comment	National Grid's response
		(GLVIA3)⁴⁵, as part of the Environmental Impact Assessment process. Harm is considered in the planning balance, given use of the term in national planning policy. The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project in relation to the Wid Valley and adjacent areas. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement (NPS) EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors in the Wid Valley and adjacent areas including Ingatestone and Fryerning Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under LCA D2 Brentwood Hills (paragraphs 13.3.736 to 13.3.756) and LCA 11 West Billericay Wooded Farmlands (paragraphs 13.3.784 to 13.3.800). The Wid Valley and adjacent areas including Ingatestone and Fryerning Parish are located within Visual Receptor Areas (VRAs) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors within the Wid Valley and adjacent areas including Ingatestone and Fryerning Parish are set out under VRAs in 6.13.A3 Environmental Statement Appendix 13.3 – Landscape Baseline and Assessment [APP-229] as below: • F11 Margaretting and Stock (paragraphs 13.9.123 to 13.9.135)

⁴⁵ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
		• VRA G1 Ingatestone and Fryerning (paragraphs 13.10.1 to 13.10.12) • VRA G4 Ingrave and Herongate (paragraphs 13.10.37 to 13.10.48). Viewpoint assessment findings also identify significant and adverse visual effects. This includes views from Ingatestone and Fryerning Parish looking to the east as represented by Viewpoint 7.09 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232], pdf page 151. Views looking west into the Parish, over the Wid Valley, are represented by Viewpoint 7.01 and Viewpoint 7.12 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232], pdf pages 127 and 160 respectively. Viewpoints 7.09, 7.01 and 7.12 are approximately 0.21 km, 1.32 km and 0.22 km away from the nearest above ground structure of the Project. The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting in the Wid Valley. During both construction and operation (and maintenance) phases, the historic environment and setting of this area have been assessed. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)⁴⁶. The Applicant recognises that a number of permanent adverse effects (some of which are significant) are predicted for the historic environment in this area. This includes the potential for less than substantial harm to designated heritage assets. However, the assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations

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

Topic	Comment	National Grid's response
		2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Alternatives	We believe viable, less damaging alternatives exist specifically offshore routing, undergrounding, or use of lower-impact pylon design such as the T-ylon-and request that these options be given proper, transparent consideration.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. A standard lattice pylon is the starting point for any overhead line as guided by National Policy Statement EN-5 (2024) and the consideration of the mitigation hierarchy. There are two locations where the Applicant is proposing to change to the low-height lattice design. These are Little Waltham (sheets 3 and 4 of 2.3 Works Plans - Section F [APP-022]) for heritage reasons and keeping heights below and out of the view of some

Topic	Comment	National Grid's response
		gardens, and the other location is Thurrock due to technical reasons for the airfield (sheets 1 and 2 of 2.3 Works Plans - Section H [APP-024]). T-pylons are considered in locations where the mitigation hierarchy identifies that lattice pylons are unacceptable. The Applicant did not identify any locations that met this on the Project.
Landscape and Visual	Grounds of objection 1. Severe landscape and visual harm The Wid Valley east of Ingatestone is an area of exceptional natural beauty within the parish. The introduction of 50-metre lattice pylons (pylons TB187–TB199) would dominate views, fragment the skyline and substantially erode the peace and character of open valley landscapes. The cumulative visual effect—given the current scarcity of overhead lines in this locality—would be particularly damaging.	The Applicant notes the concerns raised. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. The term ‘Harm’ is not reported on in a LVIA, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁴⁷, as part of the Environmental Impact Assessment process. Harm is considered in the planning balance, given use of the term in national planning policy. The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project where it crosses the Wid Valley, between pylons TB187 and TB199. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement (NPS) EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors in the area around Ingatestone and Fryerning are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under LCA D2 Brentwood Hills (paragraphs 13.3.736 to

⁴⁷ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

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		13.3.756) and LCA 11 West Billericay Wooded Farmlands (paragraphs 13.3.784 to 13.3.800). The Wid Valley near Ingatestone and Fryerning is located within Visual Receptor Areas (VRAs) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors within the Wid Valley are set out under VRAs in 6.13.A3 Environmental Statement Appendix 13.3 – Landscape Baseline and Assessment [APP-229] as below: • F11 Margaretting and Stock (paragraphs 13.9.123 to 13.9.135) • VRA G1 Ingatestone and Fryerning (paragraphs 13.10.1 to 13.10.12) • VRA G4 Ingrave and Herongate (paragraphs 13.10.37 to 13.10.48). Viewpoint assessment findings also identify significant and adverse visual effects. This includes views from Ingatestone and Fryerning Parish looking to the east as represented by Viewpoint 7.09 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232], pdf page 151. Views looking west into the Parish, over the Wid Valley, are represented by Viewpoint 7.01 and Viewpoint 7.12 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232], pdf pages 127 and 160 respectively. Viewpoints 7.09, 7.01 and 7.12 are approximately 0.21 km, 1.32 km and 0.22 km away from the nearest above ground structure of the Project. Cumulative effects are set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and supporting appendices. No significant cumulative visual effects are identified within VRA F11 Margaretting and Stock, VRA G1 Ingatestone and Fryerning and VRA G2 Billericay West.
Historic Environment	2. Heritage and local amenity impacts. The scale and industrial appearance of traditional lattice pylons would be discordant with local historic	During both construction and operation (and maintenance) phases, the settings of designated heritage assets such as the conservation areas or listed buildings within Ingatestone and Fryerning Parish, have been assessed. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] , 6.19 Scoping Report [APP-288 – APP-296] and 6.20

Topic	Comment	National Grid's response
	and rural settings and would harm the enjoyment of public rights of way, conservation areas and the wider setting of heritage assets.	Scoping Opinion [APP-297], and in line with professional guidance, including The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)⁴⁸. The Applicant recognises that a number of permanent adverse effects (some of which are significant) are predicted for the historic environment in this area. This includes the potential for less than substantial harm to designated heritage assets. However, the assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph

⁴⁸ Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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		4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. Public Rights of Way (PRoWs) are not considered as part of the historic environment assessment, in accordance with the scope agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and through regular engagement with historic environment stakeholders throughout the pre-application stage of the Project. The Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] considers the effect of the Project on the visual amenity of people using PRoWs. This is in accordance with the approach set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], which is in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁴⁹ and Clarification Notes. The LVIA does not consider PRoWs as features in their own right.
Alternatives	3. Failure to give adequate weight to less intrusive alternatives National Grid appears to have dismissed offshore or underground cable routing primarily on cost grounds. While cost is a material consideration, the Council cannot accept cost alone as a sufficient justification for proposals that will cause significant and permanent damage to valued local landscapes and heritage. Likewise, the dismissal of modern, lower-impact pylon designs—most notably the	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.

⁴⁹ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

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	award-winning T-pylon—has not been adequately justified.	
Good design	4. Evidence supporting lower-impact pylon designs The T-pylon is substantially shorter than traditional 400kV lattice pylons, has a smaller footprint and a contemporary form that is less intrusive in the landscape. National Grid's own material acknowledges that the T-pylon's lower height and design would reduce visibility to sensitive receptors in areas such as Ingatestone. The Council considers the deployment of T-pylons in the sensitive Wid Valley section (TB187–TB199) to be a proportionate and reasonable mitigation measure.	The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics ⁵⁰ confirms that whilst T-pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this is at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times that of a conventional overhead line. The current arrangements for the oversight of funding by Ofgem requires that the lowest cost acceptable design is taken forward rather than a more expensive design even if that design is perceived to reduce the level of effect. As such consideration of their use follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefit of adopting a low-height lattice pylon design. T-pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, their resilience and environmental impact are comparable to conventional overhead lines, but with increased carbon intensity due to construction materials. Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix C of the 7.21 2024 - Design Development Report for the Project Appendices [REP1-069]) where there may be a design option for the use of T-pylons, the need to mitigate for unacceptable effects from lattice pylons is not engaged. On this basis T-pylons are not proposed for the Project.
Alternatives	Request to the Planning Inspectorate Given the significant landscape, visual and heritage harm that the proposed lattice pylons would	1. The Applicant notes the respondent's feedback. Construction costs are included in the overall estimated costs of each strategic option. This was set out in the 2024 Strategic Options Backcheck and Review (available as Appendix B of 7.17 Strategic Options Backcheck and Review [APP-355]). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and

⁵⁰ Institution of Engineering and Technology (2025) *A Comparison of Electricity Transmission Technologies: Costs and Characteristics*

Topic	Comment	National Grid's response
	cause, we respectfully request that the Planning Inspectorate: 1. Instruct National Grid to produce a clear, comparative appraisal that transparently assesses offshore routing, undergrounding and lower-impact overhead alternatives (including T-pylons), with full cost-benefit and environmental impact analysis specific to the Wid Valley and other sensitive sections; and 2. Require National Grid to demonstrate why, if at all, T-pylons and other less intrusive technologies are not suitable for pylons TB187–TB199 and other sensitive locations, rather than relying on high-level cost arguments alone.	regulatory framework. Where the costs of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. We will continue to engage with the government and our regulators regarding policy and costs for new infrastructure and will adjust our approach if necessary. A full and transparent cost model is provided in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355], which sets out in transparent detail how options appraisal costs were evaluated. 2. A response in relation to T-pylons is provided in the row above.
N/A	Conclusion: Ingatestone & Fryerning Parish Council accepts the need for improved transmission capacity, but not at the expense of permanent and avoidable damage to local landscapes, heritage assets and community amenity. We ask the Inspectorate to ensure that the Secretary of State and National Grid properly and transparently consider offshore	The position of the Parish Council is noted. A response to the specific points of objection is provided above.

Topic	Comment	National Grid's response
	routing, undergrounding and T-pylon alternatives before any consent is granted for traditional lattice overhead infrastructure through this parish.	

2.34 Langham Parish Council

2.34.1 Table 2.34 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Langham Parish Council [RR-2069]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.34 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Alternatives	Nationals Grid's three previous rounds of consultation have all been deficient in scope because they have failed to seriously appraise alternative options such as an offshore grid or HVDC undergrounding- options which National Grid are using in other parts of the United Kingdom.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement (NPS) EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. Furthermore, the Applicant cannot present proposals for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. At each stage of consultation, the Applicant has presented our consideration of the alternative route options and technologies. All feedback received at each stage of consultation has been considered by the Project team and, where appropriate, the Applicant has amended the proposals in response. The proposals that we have chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by NPS EN-1 (2024) and NPS EN-5.
Consultation	The scope of their consultations has been extremely narrow, looking only at micro-adjustments to a predetermined solution based on Pylons. Their final round of targeted consultations was	The Applicant carefully considered the most feasible options and presented our proposals for public consultation. The scope of our consultations is defined by the fact that we cannot present plans for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. The Project has been designed in line with government policy as contained in National Policy Statement EN-5 (2024), which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting

Topic	Comment	National Grid's response
	further deficient in its failure to contact and consult all residents living in close proximity to the proposed amended route through Langham (and maybe other affected areas as well?).	presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. Except in nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts. The Applicant has rigorously tested all realistic alternatives to assess those impacts, including onshore alternating current (AC) cable, AC gas-insulated line, high voltage direct current (HVDC) options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socio-economic, programme and cost considerations, all of which were clearly presented at each stage of consultation. All feedback received at each stage of consultation has been considered by the Project team and, where appropriate, the Applicant has amended our proposals in response. This has included adjustments to the alignment, but the Applicant has also proposed the use of underground cable in additional areas of the route where appropriate. At the targeted consultations in 2025, the Applicant developed bespoke consultation zones for each location to include nearby properties which were likely to be affected. They were created following the principle that each consultation zone should be appropriate and proportionate in relation to the type and potential impact of the change. These properties were sent consultation materials and a letter in the post. For those outside of the bespoke consultation zones, the Applicant issued an email update at the start of the consultation to the list of those who asked to be kept informed on the Applicant's proposals. This announced the beginning of the consultation and directed to where details of the proposed changes could be found. The Applicant also advertised the targeted consultations in local media and wrote to elected representatives. The Applicant's lands team and land agent, Fisher German, were also in contact with affected landowners and offered meetings. Some of this communication happened on a different timeline to the public targeted consultations which included Essex .
Landscape and Visual	The revised route through Langham adds significantly to the overall route length, and more specifically this additional route length lies mostly with the protected Dedham Vale	The change in routeing is fully explained in Section 6.4 of 5.15 Design Development Report [APP-122] . The route is now through land that is predominantly in arable cultivation and avoids the additional risks and effects presented by the previous routeing which was close to a Grade I church, envisaged trenchless crossing under ancient woodland with potential effects on protected species and would have required more extensive tree removal amongst other effects.

Topic	Comment	National Grid's response
	National Landscape. The plans and documentation submitted do not appear to come close to the enhanced duty that now applies to protection of National Landscapes under section 85 of the Countryside and Rights of Way Act 2000: proponents can no longer simply “have regard” to conserving and enhancing the landscape, but “must” do so. The Secretary of State has recently conceded that this is the position in a case which was brought by the Dedham Vale Society. The National Landscape's views, setting & surroundings will be significantly impacted by vast amounts of infrastructure placed less than a mile of its boundary. The run of pylons along the southern boundary will be visible across a huge swathe of the National Landscape, notably changing the landscapes immortalised by the world-renowned landscape artists Constable and Gainsborough. Multiple vast substations near Ardleigh will	The Applicant has a statutory duty, in accordance with s 85 of the Countryside and Rights of Way Act 2000, to seek to ‘further the purposes’ of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term ‘harm’) on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect arising from infrastructure proposed outside the designated area. An assessment of ‘Harm’ is not reported on in a Landscape and Visual Impact Assessment, the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment⁵¹, as part of the Environmental Impact Assessment (EIA) process, but it is considered in the planning balance, given use of the term in the policy above. The purpose of a National Landscape is to ‘<i>conserve and enhance natural beauty</i>’, as set out in the Countryside and Rights of Way Act 2000. The special qualities of Dedham Vale National Landscape (DVNL) explain the aspects of natural beauty which are important for this nationally protected landscape. When considering effects on special qualities, the long-term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute ‘harm’ to these special qualities. There will however be some significant visual effects on views looking outwards from the edge of DVNL. The fact that the Project will be visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the special qualities of the National Landscape will not be significant (and so will not constitute ‘harm’). Note that, in terms of indirect effects, the potential for effects on the special qualities of the DVNL was considered when siting the Cable Sealing End compounds to the north of Raydon airfield and at Great Horkesley.

⁵¹ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
	also be visible from the National Landscape along with the pylons to the North.	In addition, there will be short to medium-term significant effects on the special qualities of DVNL during construction and after reinstatement, as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. This is because of the time it takes grassland to establish across disturbed areas, and for hedgerows and trees to grow. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The assessment was undertaken taking into consideration the special qualities, which describe which aspects of natural beauty are important in the DVNL. The assessment was also informed by a Position Statement from the Dedham Vale National Landscape Partnership : Development in the Setting of the Dedham Vale Area of Outstanding Natural Beauty (AONB)⁵². The Position Statement clarifies that: <i>'The National Landscape Partnership...considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in substantial impacts, positive or negative, on the natural beauty and special qualities of the AONB.'</i> [emphasis added]. It is considered (as informed by paragraph 5.10.34 of NPS EN-1 (2024)) that the reference to 'substantial' impacts here is taken as meaning the 'likely significant effects' identified through the EIA for the Project. Figures A13.5.6 to A13.5.12 within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of DVNL. These figures are useful to aid in the understanding of theoretical visibility related to the Project within 5 km of DVNL because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. For example, Viewpoint 4.07: School Road / Stour Valley Path, west of Little Horkesley is approximately 1.7 km from

⁵² Dedham Vale National Landscape Partnership (2024) *Development in the Setting of the Dedham Vale AONB*

Topic	Comment	National Grid's response
		the nearest above ground structure of the Project. The assessment of effects from Viewpoint 4.07 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], pdf page 17. At this distance, effects are judged to be negligible and not significant (adverse) during construction, at year 1 and also year 15 of operation. The assessment of effects on a number of viewpoints within the National Landscape conclude that the visual effects of the overhead line outside the National Landscape would at most be minor adverse and not significant. This includes consideration of effects on Viewpoint 3.20 which can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 132. Viewpoint 3.20 is approximately 4.24 km from the nearest above ground structure of the Project and represents a locally promoted view looking south over the Stour Valley, in an area associated with Constable. The East Anglia Connection Node (EACN) Substation is approximately 1.3 km from the National Landscape boundary. The ZTV in 6.13.F12 Environmental Statement Figure 13.12 - ZTV of East Anglia Connection Node EACN [APP-248] indicates few publicly accessible locations within approximately 1.3 km to 3 km from which glimpsed views of the tops of taller equipment such as gantries within the substation may be possible. For example, Viewpoint 3.19 is approximately 2.44 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 3.19 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 130. At this distance, effects are judged to be minor-moderate and not significant (adverse) during construction, at year 1 and also year 15 of operation.
Biodiversity, Ecology and nature conservation	The plans will have huge impact to the National Landscape itself and its surrounding, ranging from loss of trees, hedging, animal	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method, e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies and relevant Local Planning Authorities) throughout the development of the Project design and

Topic	Comment	National Grid's response
	habitats, and sensitive ecosystems.	environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) that accompanies the application for development consent. The ES is based on an assumed worse- case tree and hedgerow removal, including that within Dedham Vale National Landscape, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 162 to 177 of 352 of Figure A13.6.1 within 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity and Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) includes mitigation measures to avoid or reduce risks to habitats and species. Measures to avoid/mitigate impacts to all trees is Project commitment LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain (BNG) with wider environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment.
Water environment	One significant area of concern is the wetlands/floodplains at the centre of the Vale.	The Applicant acknowledges that the Project crosses the River Stour and its floodplain. The river is a receptor included in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and is addressed in 7.9 Flood Risk Assessment [APP-331]. 7.9 Flood Risk Assessment [APP-331] addresses the Stour valley, flood defences along the Stour, flood history, floodplain and measures that would be in place to reduce effects on the River Stour.

Topic	Comment	National Grid's response
		It is proposed that the River Stour would be crossed by a trenchless crossing to reduce effects on the River Stour during construction. A Flood Warning and Evacuation Plan (7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]) would be in place for construction works within the floodplain. Further detail on the measures that would be in place is provided within 7.2 Outline Code of Construction Practice (Revision C). With mitigation in place there would be no significant effects.
Water environment	There is also significant risk of damage to the river (silting up) due to planned works on the floodplains (trenching and tunnelling) with no obvious mitigations.	The risk of damage to the River Stour from silting up/sediment entering the river has been considered as part of the assessment in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and 7.10 Water Framework Directive Assessment [APP-332]. Measures would be in place to safeguard the water quality and hydromorphology of the river. These include, for example, commitments GG23, GG32, B03 and W10 in 7.2 Outline Code of Construction Practice (Revision C). With these measures in place, there would be no significant effects on the River Stour.
Water environment	Finally, there is a significant concern relating to increased flood risk to the village of Stratford St Mary due to the planned works.	Environment Agency flood mapping indicates that parts of Stratford St Mary are at risk of fluvial flooding and surface water flooding. Areas of risk such as this are acknowledged in 7.9 Flood Risk Assessment [APP-331]. Section 4.8 of 7.9 Flood Risk Assessment [APP-331] summarises the assessment of fluvial flood risk for construction and operation of the Project whilst Section 4.10 addresses surface water flooding. As part of this assessment, potential impacts of the Project on flood risk have been considered. Measures would be in place during both construction and operation of the Project with respect to both of these sources of flooding. These measures would ensure that the Project does not result in an increase in flood risk and have been agreed with the Environment Agency. Further detail on the measures is within 7.2 Outline Code of Construction Practice (Revision C). A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The Drainage Strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled.

2.35 Langham with Boxted Parochial Church Council

- 2.35.1 Table 2.35 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Langham with Boxted Parochial Church Council [RR-2070]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.35 Comments and National Grid's response

Topic	Comment	National Grid's response
Historic Environment	I register on behalf of [REDACTED] Priest-in-Charge, St Mary's Church Langham and of the Trustees of the Langham with Boxted Parochial Church Council. St Mary's Church, a grade 1 listed building at CO4 5PS, sits just above the Stour river in the Dedham Vale and neighbours Langham Hall and Church Farm (previously known as Glebe Farm when painted by Constable). This is an area of significant heritage value as is well documented. The church is set apart from the main village with access along a drive from the Dedham Road close to where your proposed project will cross that road.	The Applicant notes the respondent's comments.

Topic	Comment	National Grid's response
	Langham Church is part of a group of 6 parishes, including churches in Boxted, Great Horkesley and Little Horkesley, so our parishioners are widespread. Our previous responses to National Grid during their consultations have focused on St Mary's but also consider the impact on our parishioners across 7 villages affected directly by proposed routes or by future disruption and significant changes to the local landscape.	
Alternatives	We object to the way the National Grid consultation has been conducted since we have not been provided with alternatives for consultation nor with enough detail to make a reasoned decision. Although NG presented alternatives in the Strategic Options Lookback Review, there was no consultation on these. This exposes the degree of pre-determination of the one route. We also question the need for a 2030 deadline.	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.

Topic	Comment	National Grid's response
Needs Case	I had lengthy conversation with one of the project managers in 2024. He admitted that if 2035 were to be adopted, the Planning Framework indicates that the offshore option would for cost and environmental reasons be the preferred option from National Grid's point of view. We strongly urge reconsideration of the 2030 deadline and whether this is in the longer term interests for National Grid and for everyone affected by this upgrade.	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the GB energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on net zero delivery.
Landscape and Visual	It is clear the current proposal is destructive and causes irreparable harm to heritage, landscape, ecology and wildlife.	The Applicant notes the concerns raised by Langham and Boxted Parochial Church regarding the potential effects of the Project on heritage, the landscape and ecology and wildlife around Langham and Boxted. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, ecology and landscape in Langham and Boxted Parishes. i) Heritage The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented

Topic	Comment	National Grid's response
		in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report (Rev B) [AS-72, AS-074, AS-076]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report - Clean Version (Rev B) [AS-078]. In addition to the proposals in 7.2 Outline Code of Construction Practice (Revision C) the 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. The Project would lead to no harm or less than substantial harm to designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. ii) landscape The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁷. The Applicant has responded to concerns raised, regarding landscape effects, in relevant representations made by Langham and Boxted Parish Council. EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. iii) Ecology and wildlife 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on these important ecological receptors. As part of the

Topic	Comment	National Grid's response
		Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys were undertaken, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats. Following the implementation of mitigation measures there will be no significant residual effects on any ecological receptors. In addition the Applicant has committed to delivering 10% BNG with environmental and societal benefits for the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Health and Wellbeing	We are aware from our parishioners that the lengthy disruption as well as the destruction of wide areas of landscape will cause serious stress and worry during construction and ongoing distress due to the changed landscape following completion of the work.	The Applicant recognises that activities construction activities have the potential to cause disruption and that this can potentially impact people's wellbeing through ongoing stress and anxiety. The Applicant has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential impacts of the Project on mental health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], particularly in relation to the construction phase. The assessment references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings.

Topic	Comment	National Grid's response
		This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time. There is likely to be a small minority of the population who experience adverse effects as a result of changes to visual amenity, however this is not expected to result in a significant health impact.
Biodiversity, ecology and nature conservation	Your plans will irreparably alter the Dedham Vale and, with 2.6km required for the swathe, parishioners are stunned at the loss of trees.	The Project has been designed to minimise effects on Dedham Vale National Landscape; including consideration of the Project within the National Landscape and its setting. While there would be significant effects during construction, these would reduce and be not significant during operation (and maintenance). The assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] is based on the Project design as described in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. No further measures to reduce impacts are proposed beyond those set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. However, the Applicant would seek to minimise effects on the National Landscape during construction through development of the detailed design (e.g. by minimising tree loss). The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. As reported in 5.6 Planning Statement [APP-085] embedded mitigation has sought to minimise landscape effects as far as practicable.

Topic	Comment	National Grid's response
		Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries.
Biodiversity, ecology and nature conservation	It should be noted that [REDACTED] is home to bats, including two rare species.	The presence of roosting bats within [REDACTED] and the surrounding woodland was identified through detailed bat surveys over 2023-2025. Results of the bat surveys are presented in 6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034] and 6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]. Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on bats and in the area of Langham/Boxted, this has resulted in a diversion of the 400 kV underground cable to the west of [REDACTED]. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on protected species, including bats, based on this baseline information and where/if required appropriate mitigation measures are detailed within the 7.4 Outline Landscape and Ecological Management Plan [AS-046]. Following the implementation of mitigation measures there will be no significant residual effects on bats.
Socio-economics Recreation and Tourism	St Mary's has regular services and requires daily, uninterrupted access and we have concerns about the haul road running close to the church. St Mary's is also a destination for tourists. Visitors will note the industrialisation effect as all roads into the Dedham Vale will pass beneath lines of pylons. This has been dismissed by	Construction access and traffic management would be managed accordingly as set out in the 7.2 Outline Code of Construction Practice (Revision C), 7.6 Outline Public Rights of Way Management Plan [APP-329] and 7.3 Outline Construction Traffic Management Plan [APP-309]. Please refer to the response below in this table relating to transport and traffic for more detail on access to the church. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] concluded that no significant adverse effects are anticipated on the tourism economy in the Wider Study Area during construction. Tourism economy during operation (and maintenance) was scoped out as agreed in the 6.19 Scoping Report and 6.20 Scoping Opinion [APP-297].

Topic	Comment	National Grid's response
	NG on the basis that roads are 1.5 to 2.5km away. This is wrong, they are as close as 1.3km.	The Applicant has responded to concerns regarding roads to Dedham Vale passing beneath the Project in 9-5.593 of 5.1 Consultation Report [APP-066]. The following roads would be oversailed by the proposed 400 kV overhead line south of Dedham Vale National Landscape (DVNL): • B1508 Colchester Road (approximately 2.2 km along the road network to the nearest part of DVNL) • Straight Road (approximately 2.2 km along the road network to the nearest part of DVNL and 2.6 km along Straight Road) • Langham Lane (approximately 2.7 km along the road network to the nearest part of DVNL) • A12 and Old Ipswich Road (approximately 1.6 km along the road network to the nearest part of DVNL) • Dead Lane (approximately 2 km along the road network to the nearest part of DVNL) • B1029 Deadham Road (approximately 1.5 km along the road network to the nearest part of DVNL) • A137 Harwich Road (approximately 1.8 km along the road network to the nearest part of DVNL) • Hungerdown Lane (approximately 1.9 km along the road network to the nearest part of DVNL) The Church of St Mary at Langham is approximately 3.75km north of the closest pylon (as the 'crow flies'). People travelling along roads crossed by the proposed 400 kV overhead line, south of DVNL, would be travelling for a range of distances between the overhead line and DVNL. The distances vary between approximately 1.5k m and 2.7 km. People would travel past other intervening built form including houses, commercial buildings and smaller scale vertical elements such as road signs, wood pole lines and 132kV lattice overhead lines before entering the National Landscape.
Landscape and Visual	It is implausible to say that the Dedham Vale is unimpacted and our understanding from	The Applicant notes the concerns raised by Langham and Boxted Parochial Church. As a point of clarification the Applicant has not stated that Dedham Vale National Landscape would be unimpacted by the Project. An assessment of effects on the special qualities of

Topic	Comment	National Grid's response
	other assessments is that infrastructure will be visible almost everywhere in the National Landscape. This happens because the cable route is far too close to the Dedham Vale as are the Sealing End Compounds. They run through wide open countryside and along the ridge parallel to the Dedham Vale which is of concern to our parishioners in these areas and to all who travel about between the villages.	Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. As reported in 5.6 Planning Statement [APP-085] Embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that 'virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape' and paragraph 5.10.13, that 'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'. For CNP infrastructure, 'the need case will outweigh the residual effects in all but the most exceptional cases' (paragraph 4.1.7 of NPS EN-1 (2024)). The Applicant assumes the respondent's comment relating to the visibility of infrastructure including the 'cable route' and CSE compounds is made with reference to the proposed 400 kV overhead line and CSE compounds outside Dedham Vale National Landscape. The assessment of effects on Dedham Vale National Landscape has considered potential visibility of above ground infrastructure sited outside the National Landscape. Figures A13.5.6 to A13.5.12 contained within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility related to the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is

Topic	Comment	National Grid's response
		important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. For example, Viewpoint 4.36, on the southern boundary of the National Landscape, is approximately 1.58 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 4.36 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], pdf page 109. At this distance, effects are judged to be negligible and not significant (adverse) during construction, at year 1 and also year 15 of operation. The assessment of effects on a number of viewpoints within the National Landscape conclude that the visual effects of the overhead line outside the National Landscape would at most be minor adverse and not significant. This includes consideration of effects on Viewpoint 3.27, B1066 Park Road, near Thorington Street, which can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 151. Viewpoint 3.27 is approximately 4.80 km from the nearest above ground structure of the Project.
Landscape and Visual	You have made no significant efforts to screen the project and those in Langham's main village, as well as in Boxted, Great Horkesley and Little Horkesley have concerns whether as home owners, business owners or farmers.	The Applicant has sought to reduce, as far as practicable, potential impacts on visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the effects of the Project in relation to the impacts on people's views from areas including Langham, Boxted, Great Horkesley and Little Horkesley. Effects on visual receptors including the local communities of Langham, Boxted, Great Horkesley and Little Horkesley are set out under Visual Receptor Areas (VRA) in 6.13.A3 Environmental Statement Appendix 13.3 – Landscape Baseline and Assessment - Part 1 of 4 [APP-229] as below: • VRA C11 Langham (paragraphs 13.6.122 to 13.6.137) • VRA D1 Tye Green and Boxted (paragraphs 13.7.1 to 13.7.12) • VRA D2 Little Horkesley and Wormingford (paragraphs 13.7.13 to 13.7.24) • VRA D3 Great Horkesley and Horkesley Heath (paragraphs 13.7.25 to 13.7.40)

Topic	Comment	National Grid's response
		There would be some significant effects on views towards construction of the proposed underground cables and 400 kV overhead line from parts of Langham, Boxted and Great Horkesley, during construction. Significant effects would remain in some views from Boxted and Great Horkesley during operation; albeit the mitigation planting within the Environmental Area around the Great Horkesley (EACN side) CSE compound would aid in filtering views over time as represented by the assessment of Viewpoint 4.03 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], pdf page 6. Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Proposals for planting around the CSE compounds are included within 'Environmental Areas' illustrated in Appendix D of 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]. 7.16 Design Approach for Site Specific Infrastructure [APP-354], discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detailed design stage. The final details of landscape and visual mitigation within the 'Environmental Areas' will be provided in the final Landscape and Ecological Management Plan secured by Requirement 4 within 3.1 Draft Development Consent Order [APP-056] and subject to approval by the relevant Local Planning Authorities. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant effects on visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
Alternatives	ALL of these impacts can be avoided if NG were to make use of offshore connections. We continue to support	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with

Topic	Comment	National Grid's response
	as our first choice the idea of a 'Fully Integrated Offshore Alternative' of the type set out by ESO in their November 2020 paper catering to the needs of the whole of East Anglia region and East Coast as a whole. We believe that this would provide a far better and more resilient solution for the future as the need for offshore wind power continues to grow. If 2030 remains the deadline and an Integrated Offshore Grid cannot be considered, then we believe National Grid must: 1. maximise the amount of infrastructure which is placed offshore and minimise that onshore, and / or,	change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Alternatives	2. employ onshore underground HVDC cables as proposed by ESO in Alternative 8 of their East Anglia Review and note that these would mitigate damage throughout	National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital

Topic	Comment	National Grid's response
	the entire length of the project. ESO concluded that this option was viable at almost the same cost as Pylons, although pylons are likely to be very delayed and costs for those will rise, whereas underground HVDC can most likely be delivered on time given how much community support exists for that alternative. Maximising offshore coordination will further reduce costs and harms.	cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	If underground HVDC solutions are impossible and the current proposal must go ahead, in light of the planning requirements and National Policy Statements: National Grid must remove the EACN from its proposals, connecting North Falls and Five Estuaries offshore to Sealink as proposed under the OCSS. As set out in Sir Bernard Jenkin's submission to OFGEM the Tarchon interconnector is against the national interest. It	The Applicant refers the respondent to the response provided above in relation to consideration of offshore alternatives. In relation to the siting of the East Anglia Connection Node (EACN) Substation overall, alternative locations for the EACN Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardeigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360].

Topic	Comment	National Grid's response
	will result in an increase of £5bn in consumer bills, an increase in UK carbon output and will do nothing for UK energy security. It increases constraint costs as it destabilises the rest of the UK network. Tarchon has no place in East Anglia and there is nothing in National Policy allowing National Grid to use it as an argument to destroy the Dedham Vale.	
Alternatives	1. National Grid must modify routing to avoid the National Landscape altogether. Although National Grid has not consulted on EAS1, the Strategic Option Backcheck Review highlights that it could be used to replace the section of Norwich to Tilbury between Bramford and Tilbury, that it is cheaper than Norwich to Tilbury and that the only reason for not considering it is the work invested in the	Unfortunately the EAS1 option does not address all aspects of the need case, and as identified in the 7.17 Strategic Options Backcheck and Review [APP-355] and in the Applicants Deadline 2 submission there would be an additional cost estimated in the order of £500m to make this a comparable option. As such this option is therefore less preferred to the Project taken forward. More generally the Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in [APP-358 to APP-360]).

Topic	Comment	National Grid's response
	current proposals. In terms of policy ('even residual impact is unacceptable, avoid altogether areas of value by planning the route of the line in the first place even if the total mileage is somewhat increased in consequence, seek to avoid altogether internationally and nationally designated areas') National Grid is required to adopt alternatives such as EAS1 which avoid damage to the National Landscape in place of those which impact it. Other alternatives, such as the Alternative 5b proposed by ESO in the East Anglia Review are similarly achievable and would do the same.	
Biodiversity, ecology and	2. If construction goes ahead on the proposed	The Environmental Statement is based on a reasonable worst-case scenario of vegetation loss, based on the overhead line and underground cable design presented on

Topic	Comment	National Grid's response
nature conservation	route (or on any onshore route), National Grid must minimise the amount of hedgerow and the number of trees removed	6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design [APP-133] . Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts where practicable.
Transport and Traffic	<i>[If construction goes ahead on the proposed route (or on any onshore route), National Grid must]</i> employ banksmen at road crossings to ensure local safety	Section 5.8 of 7.3 Outline Construction Traffic Management Plan (Revision B) sets out how the Applicant is proposing traffic management during construction at the proposed site access points and crossover points for the safety of road users. Traffic management will vary dependent on site-specific requirements, but may typically include: • Temporary traffic light systems (and/or stop and go boards) to control flows during construction of site access points and crossover points to allow single lane working where roads are of suitable width • Further use of temporary traffic light systems during periods of peak construction traffic flows to control turning/crossing movements at public highway interfaces • Temporary speed limit restrictions in the vicinity of proposed access and crossing points. This will be completed in combination with other measures including vegetation clearance to achieve the relevant visibility requirements. Access and crossover points will be designed to reduce highway safety risks and congestion on the public highway by providing for the safe and efficient passage of construction traffic.
Transport and Traffic	<i>[If construction goes ahead on the proposed route (or on any onshore route), National Grid must]</i> ensure that the church's land and neighbouring farmland is properly secured to avoid risks to the local community and to ensure that access to St	Permanent and temporary access routes and temporary compounds are distinct and are shown in the Project plans (in their proposed location and scale). 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] includes the same level of detail. Illustrative design drawings for the above are within 2.6.1 to 2.6.3 Design and Layout Plans [APP-041 to APP-043]. It is anticipated that roads would only be temporarily closed where this is required for safe working. In accordance with measure AS03 in the 7.2 Outline Code of Construction

Topic	Comment	National Grid's response
	Mary's Church is safe and secure for our parishioners to visit during daylight hours every day of the week.	Practice (Revision C) where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. This may require signed diversions or temporary restrictions to access. Where this is not practicable, alternative arrangements will be made with the affected parties through the land agreements, such as instances of no through route single track roads where works are required. Where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. The Applicant has provided additional detail based on the assumption of Langham St Marys Church located on the Langham Hall Estate. The Applicant is not proposing to close Dedham Road (from Gun Hill), assumed to be the key route to the Church. Dedham Road is proposed to be used as a diversion route for the temporary closures of Dedham Road (from Dedham Road), Water Lane/Dedham Road, Rectory Road/Nightingale Hill. Details of the proposed closures are shown in Section C 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-035]. In accordance with GG035 in 7.2 Outline Code of Construction Practice [APP-300], members of the community and local business will be kept informed regularly of the works through active community liaison.
Land Use	National Grid must also work closely with farmers in respect of soil removal, storage, reinstatement, drainage and irrigation, employing agricultural vehicles to minimise harm and to provide compensation to landowners where necessary.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Boxted and Langham Parishes (a mix of Grade 2 and Grade 3a land, with some Grade 3b land in the north of Langham Parish). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock.

Topic	Comment	National Grid's response
		Landowners have been and are being encouraged to provide as much information as early as possible in relation to any private supplies, drainage and irrigation systems on their land so these can be factored in at the detailed design stage of the Project ahead of construction starting on site, and are asked to raise such information at any meeting with the Applicant lands team who will keep a record and pass on any information. Soil management measures to be implemented during construction across the Project, including across Boxted and Langham Parishes, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. Compensation claims for disturbance are considered on a case-by case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.
Land and property	Proximity of underground drilling or passing heavy vehicles may have an impact on our church building or on the gravestones or on the wildlife habitat provided by the church and churchyard. This needs proper consideration and a guarantee of mitigating measures or at worst any recompense for damage or reinstatement as required. If the route is to pass near St Mary's, we expect to be appropriately consulted with further detail and communication and for our	An assessment of potential effects of vibration during construction, including potential damage to buildings and structures, is provided in Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. No specific risks of building or structural damage have been identified in the Langham and Boxted areas. Further detailed construction vibration assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 in the 7.2 Outline Code of Construction Practice [APP-300] based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which would be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]). The outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration. Additionally, Commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post- condition surveys to be conducted in situations where there is a potential for building and structural damage, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works. Compensation arrangements lie outside the EIA process.

Topic	Comment	National Grid's response
	feedback to be respected prior to any commencement of works.	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] provides an assessment on wildlife and its habitats which has been undertaken in accordance with industry standard guidance. The assessment concludes that with mitigation (which has been designed in accordance with Natural England and Local Planning Authorities) in place there would be no residual significant effects.

2.36 Lawford Parish Council

- 2.36.1 Table 2.36 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Lawford Parish Council [RR-2097]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.36 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	I write in my capacity of County, District, and Parish Councillor to object in the strongest possible terms to the above proposal. Please also treat this submission as the formal response from Lawford Parish Council. My views and those of Lawford Parish Council on the project have not changed since this proposal was made public, nor the views of the many residents of Lawford, Ardleigh, and Little Bromley who will be affected and hugely impacted by this proposal.	Noted.
Landscape and visual	The village of Little Bromley will be virtually obliterated by the creation of a new haul road, and the significant expansion of Bentley Road that will remove a huge number of ancient hedgerows, will change its rural	The Applicant notes the concerns raised by Lawford Parish Council and recognises there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance), including within Lawford Parish and on the villages of Little Bromley and Ardleigh, located within neighbouring parishes. The Applicant wishes to clarify that the proposed haul road does not directly affect the village of Little Bromley. It is proposed to run through the fields to the south of the village.

Topic	Comment	National Grid's response
	feel for ever, and so will the village of Ardleigh with 50m high pylons; and the Lawford's tranquil countryside will be decimated forever.	Effects on visual receptors within Lawford Parish, and at Little Bromley and Ardleigh are set out under Visual Receptor Areas (VRAs) C10 Dedham Heath (paragraphs 13.6.108 to 13.6.121), C13 Little Bromley (paragraphs 13.6.151 to 13.6.165), and C12 Ardleigh (paragraphs 13.6.138 to 13.6.150) in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Effects on landscape receptors within Lawford Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Area (LCA) 7A Bromley Heaths (paragraphs 13.3.375 to 13.3.391) and LCA 6A Stour Valley System (paragraphs 13.3.361 to 13.3.374). Tranquillity of the existing landscape baseline is considered within the value criteria in Tables A12 and A13 in Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and contributes to the judgement on effects. The Landscape and Visual Impact Assessment (LVIA) is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Significant effects are reported within Lawford Parish up to a distance of approximately 1.5 km for landscape and visual receptors, with the exception of LCA 6A Stour Valley System within which effects are assessed as not significant. The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] is based on an assumed worse-case tree and hedgerow removal as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 162 to 177 of 352 of Figure A13.6.1 within 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment: LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of National Policy

Topic	Comment	National Grid's response
		Statement (NPS) EN-1 (2024) acknowledges that ' <i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i> ' and paragraph 5.10.13, that ' <i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i> '. For critical national priority infrastructure, ' <i>the need case will outweigh the residual effects in all but the most exceptional cases</i> ' (paragraph 4.1.7 of NPS EN-1 (2024)).
Consultation	The amendments made by National Grid do not address any of the main concerns raised previously during the many rounds of public consultation, nor the impact to my residents in Lawford, Ardleigh, and Little Bromley, to them, their properties, and the natural environment.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .
Biodiversity, ecology and nature conservation	The damage that this proposal will do to the locality, environment, and many people's lives will take several generations to recover, especially when considering the unacceptable carbon output by the millions of tons of concrete needed to shore up these pylons throughout the countryside.	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method, e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) that accompanies the application for development consent. The ES identifies and

Topic	Comment	National Grid's response
		assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics are presented in the relevant ES chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce risks to the environment. In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area would be enhanced by 10% greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Chapter 8 of the 5.6 Planning Statement [APP-085] considers the planning balance of residual impacts against the need for the Project in accordance with the National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 3.2.7 of NPS EN-1 (2024) substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects. EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides '<i>... 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</i>'.

Topic	Comment	National Grid's response
		The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5. The residual environmental effects identified in the ES fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects. The fundamental purpose of the Project is to enable the connection of low carbon generation sources. 6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131] provides an assessment of the impact of both construction and operation of the Project on greenhouse gases (GHG). In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The Greenhouse Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project.
Alternatives	Alternative solutions to transport High Voltage Direct Current, such as underwater options have been completely dismissed the as being too expensive and unviable, and no real consideration has been given to the Government's Green Book requirement to explore all avenues and demonstrate best value. Proper consideration has never been given to routing the powerlines around the coast's seabed; this will completely remove opposition, the permanent negative impacts on communities, the damage to	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with NPS EN-1 (2024) and NPS EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
	the environment and the landscape. In the face of it, under water cables may seem a more expensive option, but when considering all the lengthy and very costly legal disputes, as well as the huge delays that these will undoubtedly cause, the insistence of pushing on with the pylons options is nothing but false economy. I don't believe that the long-term sustainability of Pylons and their ability to sustain the extreme weather events we are now experiencing has been fully evaluated, and I would hate to be the one that says: "I told you so." National Grid has so far have been utterly dismissive of this options because of the cost, yet they have never produced any meaningful cost analysis, nor any alternatives other than pylons.	
Planning policy	As the Chairman of the Tendring District Council's Planning Policy and local Plan Committee I am very proud of the fact that the Council has a range of Policies in place to	The Applicant notes the respondent's feedback. Nationally Significant Infrastructure Projects of this nature are guided by National Policy Statements (NPSs) EN-1 (2024) and EN-5 (2024). However, national planning policy in the form of the National Planning

Topic	Comment	National Grid's response
	protect the rich Historic Environment and the extensive Landscape Character, very unique to our District. These policies seek to protect the Historic Environment, our beautiful landscape, and the health of our residents. But yet, not only this proposal will ride roughshod through our policies but will also cause irreparable and lasting damage to our unique countryside, its character, and the lives of those who live along the proposed route.	Policy Framework⁵³ (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. Regarding specific areas of concern, the Applicant provides the following response: <i>a) Historic environment</i> Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Lawford Parish and the wider Tendring District. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072, AS-074, AS-076]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Project would lead to no harm or less than substantial harm to designated heritage assets and the Project will not result in any substantial harm to designated heritage assets. The

⁵³ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

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		Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. <i>b) Health and wellbeing of residents</i> The Applicant recognises that the Project would have an impact on people within Lawford Parish who live in the vicinity of the proposed route, both during the construction and operation (and maintenance) phases. Construction activities have the potential to cause disruption and this can potentially impact people's wellbeing through ongoing stress and anxiety. The Applicant has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential construction impacts are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual

Topic	Comment	National Grid's response
		amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time. There is likely to be a small minority of the population who experience adverse effects as a result of changes to visual amenity; however, this is not expected to result in a significant health impact. <i>c) Landscape and visual effects</i> As noted previously, the Landscape and Visual Impact Assessment set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Please refer to the above responses for more detail on the effects on the countryside, character and views.
Land and Property	How will Farmers and Landowners be compensated for the land that will be taken up to deliver this scheme? They will be forced to sterilise between 10% and 20% of their land, and not only they will lose the income from lost crops in perpetuity, but what they have been offered will never compensate their loss. I have yet to speak to any landowner affected by this proposal who has a good word to say about Fisher German, the Compulsory Purchase & Compensation specialist commissioned by National Grid; not one single farmer has	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.

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	told me that the packages they have been offered are an acceptable proposition to what they stand to lose.	
Health and Wellbeing	The effects that this proposals has already had and will continue to have to so many of my residents' mental health well-being, is simply horrendous. This has been hanging over them for a long time, and even more so going forward. There is a great deal of uncertainty within the farming community about how this proposals will affect their livelihoods.	The Applicant recognises people may have concerns about the health effects of living close to an overhead line. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. The Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents, communities and stakeholders throughout the development of the Project. National Grid continues to work closely with affected landowners and farmers to understand and manage impacts on individual holdings. All temporarily used land would be reinstated, with compensation available for loss of income, and disruption during construction would be minimised through established good practice. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email throughout the progress of the Project: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required).
Land use	They are extremely concerned around the legacy impacts on soil quality in terms of disturbance from energy being transported through the cables	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land

Topic	Comment	National Grid's response
	and implications for land drainage as well as water extracted from historic wells; this particular apprehension has been completely dismissed by National Grid.	Classification (ALC) surveys, of the extent of each land grade within Lawford Parish (Grade 2 land). Soil management measures to be implemented during construction across the Project, including across Lawford Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post-construction, and operation (and maintenance). Implementation of these measures would ensure the land can be restored to its previous condition, which includes its ALC grade, or as agreed with the landowner. 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] states the underground cables would be surrounded by cement-bound sand to aid dissipation of heat from the cables. 7.9 Flood Risk Assessment [APP-331] addresses the potential for the Project to impact surface water flooding through changes to the existing land drainage regime. The Drainage Strategy (8.2 Drainage Strategy DCO [REP1-072]), submitted at Deadline 1, provides additional information as to how negative effects on the land drainage regime would be managed and controlled. As per commitment W14 of 7.2 Outline Code of Construction Practice (Revision C), replacement drainage schemes will be installed where appropriate once the Project has been constructed. 7.9 Flood Risk Assessment [APP-331] concludes that, with the mitigation measures in place, there would be no significant effects on the land drainage regime. The groundwater risk assessment included as 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184] provides an assessment of the potential for impacts related to the construction of the Project, on the groundwater and groundwater receptors identified within the Study Area. This includes information obtained from Tendring District Council for private water supplies. The assessment has concluded that the Project is not generally anticipated to have any impacts on groundwater quality, levels or flow and therefore impacts on private water supplies are generally considered unlikely. However, where the assessment has concluded that there is potential for impacts on abstractions (Section 9.5 of 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]), then additional

Topic	Comment	National Grid's response
Wildlife and Ecology	Although they are proposing to underground cables in the Dedham Vale National Landscape, formerly an AONB, one of most outstanding area of natural beauty in the entire country, the visual harm caused by this proposal in together with the recovery time for those disrupted natural habitats, will take generations to recover, if at all.	Hydrogeological Risk Assessment will be carried out in accordance with commitment GH11 of 7.2 Outline Code of Construction Practice (Revision C) .
		The Applicant notes the concerns in relation to Dedham Vale National Landscape that have been raised by Lawford Parish Council. Please refer to the Applicant's responses to similar representations made by Langham and Boxted Parish Councils in Table 2.35 within this document. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. The assessment of effects of the Project on Dedham Vale National Landscape is set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. While there will be significant effects during construction, these will reduce and be not significant during operation. On completion of the underground cable works through the Dedham Vale National Landscape, habitats would be fully reinstated. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss and reinstatement as agreed with Natural England and Local Planning Authorities. The Applicant has committed to a five-year monitoring period for tree and hedgerow replacement planting as stated in 7.4 Outline Landscape and Ecological Management Plan (Revision D). Environmental Areas will be subject to a 30-year monitoring period in line with the Biodiversity Net Gain (BNG) Strategy detailed within 7.1 Biodiversity Net Gain Report [APP-299]. In addition, the Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.
Transport and Traffic	Other major concern is on the impact to our Highway assets and network through the construction traffic and the lifespan of the project; the damage to these will be unmeasurable especially when every Highways authority in the land can ill afford to maintain	7.3 Outline Construction Traffic Management Plan (Revision B) details the routing strategy for construction vehicles. The Applicant is proposing to route construction traffic along Primary Access Routes from the Strategic and Major Road Networks to the site access points. There are no proposed Primary Access Routes through Lawford. The 7.3 Outline Construction Traffic Management Plan (Revision B) details the proposed monitoring, mitigation and management procedures for the construction vehicles. Construction HGVs not adhering to the agreed routes has been identified as a matter of non-compliance and will be enforced following Section 6.4 of 7.3 Outline Construction Traffic Management Plan (Revision B) .

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	what they need to, without the added damage to its networks throughout the many years of the construction stages.	There are a number of proposed temporary diversion routes within the Lawford Parish on Grange Road, Bromley Road and Ardleigh Road, for a Little Bromley Road Closure. A section of the A137 and Tile Barn Lane are also noted as a temporary diversion route. The diversion routes are detailed on Plans D and E in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035 to APP-036 inclusive]. It is anticipated that diversion routes will not be used by construction vehicles.
Traffic and Transport	Together with district council colleagues we have been actively identifying all the businesses that will be impacted during the construction stages by the huge number of HGVs, abnormal loads carriers, road closures, debris, dust, and general inconvenience of whatever business they run, may that be Haulage, Hospitality, Manufacturing, Building, and any other activity that needs transportation. This works is still ongoing and proving difficult to calculate what the financial impact will be on all these businesses.	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). 7.3 Outline Construction Traffic Management Plan (Revision B) highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project. The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333]. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse riding modes on the roads along the Primary Access Routes located in the Local Road Network. 7.11 Transport Assessment [APP-333] submitted with the Development Consent Order application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts.
Cumulative effects	The consequential impact has been given very little prominence, as the National Grid proposal by itself will bring about substantial impacts – but when considered in conjunction with North Falls, Five Estuaries and potentially the Tarchon	Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. The assessment in the 7.11 Transport Assessment [APP-333] also considered the cumulative effects on the highway network and junctions of the combined Project and other committed developments. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments including North Falls and Five Estuaries to avoid severe

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	interconnector, the combined effects will be overwhelming, not synchronised, and utterly unacceptable to our local communities. The cumulative impacts of these developments, especially with regards to the landscape, transportation, land issues, and the permanent harm to our communities by environmental and visual blight will be massive, through years of uncoordinated damaging disturbance as well as piecemeal landscaping schemes that will change the district for ever.	residual cumulative impacts. Details of mitigation are outlined within the 7.3 Outline Construction Traffic Management Plan (Revision B). The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and no traffic information is yet available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant will continue to review new planning applications during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in submission documents then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application. The Applicant has agreed to participate in the Developer's Forum, established for the number of cumulative developments ongoing within Essex County. The Applicant will ensure liaison takes place by the Main Works Contractor(s) with Local Highway Authorities and National Highways and other developments, to ensure a coordinated approach to traffic management. In relation to the assessment of cumulative effects more widely, an assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. Lawford Parish is within Tendring District and is located within Section C of the Project. The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] concludes that in Tendring, overall, negligible and not significant effects would be expected in relation to socio-economics, recreation and tourism, ecology and biodiversity, contaminated land, geology and hydrogeology, hydrology, flood risk and land drainage, health and wellbeing, historic environment, noise and vibration, and air quality. Moderate adverse and significant effects could not be ruled out in relation to construction effects for landscape

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		and visual, and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.
N/A	All these several issues I have listed, are all material consideration that the Inspectorate must take into account during the DCO examination, and I don't believe I am a lone voice as these are similar concerns raised by thousands and thousands of people across Essex, Suffolk, and Norfolk, so we cannot all be wrong.	Noted. The Applicant has responded to feedback provided at pre-application consultation exercises in the 5.1 Consultation Report [APP-066] .
Alternatives	In closing my final and obvious comment is that all these issues can be addressed and resolved through the proper consideration and development of an offshore solution such as the Sea Link Project between Suffolk and Kent, a major, new high-voltage direct current (HVDC) electricity interconnector project being developed by National Grid Electricity Transmission (NGET) in the UK. This, as the Norwich to Tilbury has been designed to carry renewable and low carbon power and billed as "The Great Grid Upgrade".	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with NPS EN-1 (2024) and NPS EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

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	So, as they have done this elsewhere, why can't National Grid do the right thing, abandon these unsustainable and unacceptable proposal and change their plans to an underwater proposal that everyone will support and get behind.	

2.37 Little Bromley Parish Council

2.37.1 Table 2.37 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Little Bromley Parish Council [RR-2172]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.37 Comments and National Grid's response

Topic	Comment	National Grid's response
Alternatives	I am submitting this Relevant Representation on behalf of Little Bromley Parish Council (LBPC) in relation to National Grid's (NG) Norwich to Tilbury Nationally Significant Infrastructure Project (NSIP). LBPC strongly objects to the proposals as the proposals fail to identify and consider the best and least harmful approach to grid expansion. In particular, LBPC has concerns about the proposals as they relate to the Parish of Little Bromley, most notably the siting of the East Anglia Connection Node (EACN), a permanent access road from the centre of Little Bromley to the EACN and cabling infrastructure	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) there were alternatives considered that would avoid routeing through the National Landscape.
Landscape and Visual	NG's current alignment would irreversibly damage the unique character, landscape, and	The Applicant notes the concerns raised by Little Bromley Parish Council. The matters are considered in turn below: <i>d) Landscape and visual effects</i>

Topic	Comment	National Grid's response
	continuity of villages including Little Bromley which have sustained rural life for generations The historical and ecological features which make these communities precious—landscapes, habitats, cultural identity—are at grave risk, with the proposed infrastructure offering no scope for meaningful avoidance or mitigation. In addition to LBPC's detailed submissions to the 2024 Statutory Consultation and the March 2025 Targeted Consultation, LBPC objects to the NG NSIP proposals on the following principal grounds:	It is recognised there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance), including within Little Bromley Parish. Through the approach taken to routeing, siting and consideration of embedded measures, the Applicant has sought to reduce (as far as practicable) the potential landscape and visual impacts. Embedded landscape and visual mitigation is proposed within 'Environmental Areas' at the proposed new East Anglia Connection Node (EACN) Substation. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) provides the site context and identifies the landscape and visual mitigation proposals for the Environmental Area. The 7.16 Design Approach for Site Specific Infrastructure [APP-354] discusses design principles for landscape and visual mitigation with any scope for variation at detailed design stage. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant landscape and visual effects will occur. These effects are reported in the Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The LVIA included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the Environmental Impact Assessment. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁵⁴. Significant effects are identified at construction up to approximately 1.5 km for landscape and visual receptors, particularly north and west of Little Bromley. At operation, visual effects from Little Bromley would be not significant. Effects on visual receptors within Little Bromley Parish, including along Bentley Road, are set out under Visual Receptor Areas (VRAs) C10 Dedham Heath (paragraphs 13.6.108 to 13.6.121) and C13 Little Bromley (paragraphs 13.6.151 to 13.6.165) in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229].

⁵⁴ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
		Viewpoint assessment findings also identify significant and adverse visual effects. This includes views from Little Bromley Parish looking to the west as represented by Viewpoint 3.13 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]), pdf page 119. Effects on landscape receptors within Little Bromley Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Area (LCA) 7A Bromley Heaths in paragraphs 13.3.375 to 13.3.391. The assessment of construction effects on landscape and visual receptors recognises that there would be direct effects arising from construction including the removal of some landscape features, including the loss of hedgerows and trees. The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] is based on an assumed worse case tree and hedgerow removal as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 190 and 193 to 195 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment: LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries. <i>e) Historic environment</i> Through routeing and siting the Applicant has sought to reduce as far as practicable, potential impacts on the historic environment in Little Bromley Parish. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through

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		change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in the 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Bromley Parish. The Project will not result in any substantial harm to designated heritage assets. <i>f) Ecological effects</i> Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on ecological features within the Little Bromley area. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include good practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as

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		appropriate. Following the implementation of mitigation measures there will be no significant residual effects on any ecological receptors. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment.
Cumulative Effects	It is disingenuous to consider the NG proposal, particularly as it relates to the EACN, without simultaneously considering the inextricably linked proposals for the other infrastructure (including substations and converter station) also being proposed in Little Bromley by Five Estuaries, North Falls and Tarchon. The cumulative effect of all the substations and associated infrastructure will effectively destroy Little Bromley as the small rural village that has existed for well over a thousand years. It would be unprecedented for a private limited company, even operating under the guise of a Nationally Significant Infrastructure Project, to wipe out an entire community.	The Applicant does not agree with the characterisation of the effects on Little Bromley which is located around 1 km to the east of the nearest substation. An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. Inter-project cumulative effects with Five Estuaries and North Falls, as well as other infrastructure developments, are considered in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and limited information is available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application. The inter-project cumulative assessment in 6.17.A3 Environmental Statement Appendix 17.3 Inter-Project Cumulative Effects [APP-284] concludes that in Tendring, overall, negligible and not significant effects were assessed during construction and operation (and maintenance) for socio-economics, recreation and tourism; ecology and

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		biodiversity; contaminated land, geology and hydrogeology; hydrology; flood risk and land drainage; health and wellbeing; historic environment; noise and vibration; and air quality. Moderate adverse significant effects could not be ruled out in relation to construction effects for landscape and visual, and major adverse significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils.
Consultation	The so-called consultation process has been characterised by the presentation of seemingly predetermined decisions, with no credible alternatives considered or meaningful changes enacted following feedback from local communities. We have not received “fair and serious consideration” of our input, contrary to planning law and best practice (including Gunning Principles). Despite consultation being a legal mandate, NG has persistently communicated only what they intend to do and where, never inviting substantive debate or alternatives. At no time has NG held a public meeting or information session in Little Bromley. The nearest consultation venues have been 3+ miles away and neither in Little Bromley nor Ardleigh as	The Applicant does not agree that consultation on the Project has been characterised by predetermined decisions or a lack of fair and serious consideration of consultees' views. The Project comprises a proposed overhead line connection over 2 km in length and is therefore classified as a Nationally Significant Infrastructure Project (NSIP), requiring development consent under the Planning Act 2008. The Act, together with statutory guidance published by government and the Planning Inspectorate, sets out clear expectations for consultation, which were developed with specific regard to the Gunning Principles. The Applicant has developed its proposals and undertaken consultation in accordance with this statutory framework and those principles, consulting at a formative stage, providing sufficient information to allow informed responses, and considering feedback with an open mind. Consultation was undertaken in line with a Statement of Community Consultation (SoCC), which was itself consulted on with the relevant Local Authorities. The SoCC set out how consultation would be advertised and promoted, and the Applicant implemented this through a range of methods including direct mail to residents and landowners, statutory notices, public information events, webinars, and the publication of consultation materials on the Project website. In arranging consultation events, the Applicant sought to provide opportunities for engagement across the wider study area, taking account of venue availability, accessibility and geographic spread. Events were held at different times and on different days, and were supported by online materials and written consultation documents to ensure that those unable to attend in person could still participate. While it was not practicable to hold events in every settlement, residents of all areas, including Little Bromley and other communities identified as affected, were able to engage through multiple channels. The Applicant also does not agree that consultation failed to invite meaningful debate or consideration of alternatives. Consultation focused on proposals that the Applicant was actively developing and reasonably considered to be deliverable, in line with statutory

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	severely impacted villages. No evidence exists of genuine engagement nor of adjustments in response to local concerns and suggestions. Maps and documentation were and continue to be very difficult for ordinary people to access, navigate and understand.	guidance for NSIPs. Feedback received during consultation informed the ongoing development of the Project, including refinements to the proposals and the identification of mitigation, as documented in the 5.1 Consultation Report [APP-066] and the 5.15 Design Development Report [APP-122]. The Applicant recognises concerns raised regarding the accessibility and usability of consultation materials, including mapping and documentation. Throughout consultation, detailed plans and explanatory materials were made available online and at events, and consultees were able to comment on the proposals using those materials. The Applicant has sought to present complex information in a clear and accessible way, consistent with the requirements of the Planning Act and relevant guidance. All consultation responses received were recorded, reviewed and considered by the Project team. The adequacy of the Applicant's pre-application consultation was considered by the Planning Inspectorate when it decided to accept the application for examination. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Transport and Traffic	Road closures/diversions: it is impossible to fully understand and assess from the Examination Library documentation (including APP-027 and APP053) the level of impact the various road closures, diversions and other traffic management measures will have on communities like Little Bromley and the wider Tendring Peninsula over a prolonged period. It is clear that almost all roads in and out of Little Bromley will be affected at some point. LBPC feel that better modelling and	The commencement dates and the durations for each temporary road closure are yet to be fully developed, and the specific locations, timings and specific traffic management measures will be agreed with the relevant highway authorities. The Applicant is proposing to utilise the Permit Scheme, operated and managed by Essex County Council for the associated street works for the Project, to coordinate the proposed road closures. The Applicant does not envisage a significant overlap between the proposed closures. The Applicant has agreed to join and participate in a Developer's Forum to be set up by Essex County Council, to help coordinate the street works for the Project with Essex County Council and other Nationally Significant Infrastructure Projects such as the North Falls and Five Estuaries wind farm projects. As noted within 7.3 Outline Construction Traffic Management Plan (Revision B), it is anticipated that roads would only be temporarily closed where this is required for safe working. In accordance with commitment AS03 in 7.2 Outline Code of Construction Practice (Revision C), where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained

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	consultation with affected communities is necessary to understand the impact on daily movements (school, work, routine appointments etc), quality of life (carer or other "home help" services) and access to urgent medical/emergency services is needed.	throughout the construction phase, or as agreed through landowner discussions. This may require signed diversions or temporary restrictions to access. Short-term road closures associated with overhead line stringing, construction of highway mitigation works, construction of bellmouth junctions and the open-cut cable swathe are expected on some of the roads, as detailed in paragraph 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B). It is anticipated that the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. Schedule 7 and Schedule 8 of 3.1 Draft Development Consent Order (Revision C) provide locations of the Streets and Public Rights of Way (PRoWs) to be temporarily closed and Permanently Stopped Up and details of the proposed diversion routes. As set out in commitment GG30 in 7.2 Outline Code of Construction Practice (Revision C), the Applicant will keep members of the community, local businesses and local stakeholders informed regularly of the works through active community liaison. A free contact number, Project email and freepost address will be provided which members of the public can use to raise any concerns or complaints about the Project. Communication is anticipated to include sending letters/emails to residents that detail the extent of the works and, for example, any implications on parking arrangements.
Noise and Vibration	Noise and vibration concerns: Many of the houses and properties in Little Bromley are many hundreds of years old and were built without foundations. That is one of the reasons why the road through the village, all the way from the A120 to the A137 in Lawford is restricted to vehicles over 7.5T. Document APP-256 (6.14 Environmental Statement Chapter 14 – Noise and Vibration (Final Issue A). In	With regard to vibration, the properties in question are located approximately 7 m from proposed works. This is beyond the 2 m threshold distance within which there is a potential non-zero risk of damage from vibratory compaction during highway works. The Haywain is located within approximately 1 m of the works location and is therefore identified as having a greater than zero risk, and is therefore highlighted. The assessment in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] considers reasonable worst-case assumptions, and the Main Works Contractor(s) would specify mitigation measures to reduce vibration levels as set out in the 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. These measures would also reduce vibration levels at the properties to the south of the Haywain. With regard to the historic environment, the Haywain is not identified as a heritage asset within the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 -

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	Para 14.7.27 (Construction Vibration Effects on Buildings and Structures). NG have identified only “five structures or buildings where there is the potential for damage due to construction vibration from potential compaction activities”. Two of these are located along Bentley Road in Little Bromley (War Memorial and The Haywain) and another two in the entrance to Bentley Road on the turning off the A120 (Jasmine Cottage and Pellens cottage). LBPC urge the Planning Inspectorate to require NG to undertake further investigations as there are other properties along Bentley Road which are of similar age and lack proper foundations that are not listed. These include Grade II listed “Christmas Cottage” located approximately 10 meters from The Haywain which is on the list.	Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The building has not, therefore, been included in the assessment of the historic environment. Likewise, the agreed sources do not identify Jasmine Cottage or Pellens Cottage as heritage assets. The Applicant assumes that the Grade II listed ‘Christmas Cottage located approximately 10 meters from The Haywain’ is the National Heritage List asset ‘Pair of Cottages Approximately 10 Metres South of the Fox and Hounds Public House’ (NHLE 1111418). If this is the case, then the asset is set back from Bentley Road some 11 m. The Applicant, therefore, defers to the findings of the vibration assessment noted above.
Noise and Vibration	Construction traffic noise: Para 14.7.33 of Document APP-256 notes the potential for “a large adverse magnitude impact” along Bentley Road with	With regard to construction traffic noise on Bentley Road, this is assessed in 6.14.A2 Environmental Statement Appendix 14.2 - Construction Traffic Noise Assessment [APP-258]. The Applicant agrees that a large magnitude change in noise level is predicted on Bentley Road. However, this is primarily due to the low existing traffic flows on Bentley Road. Although traffic flows would increase, they would still remain relatively

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	specific properties noted as being particularly at risk and even with mitigation, Para 14.7.36 notes that “major significant adverse effects from construction traffic noise would still be expected along Bentley Road.” LBPC are very concerned by this and the prolonged impact on residents particularly as it is clear that construction activity will continue over weekends and public holidays.	low. As such absolute noise levels at most of the properties along Bentley Road would not be regarded due to their distance from the road. On balance, the effects would likely be adverse, rather than significant adverse. The exception to this is Jasmine Cottage which is located in very close proximity to the road (approximately 1 m). Due to this distance, noise levels would be relatively high. Coupled with the change in noise level, the effects at this property are considered, on balance, to be significant.
Historic Environment	Impact on Little Bromley protected War Memorial: we are concerned that Little Bromley war memorial, listed as a building of Special Architectural or Historic Interest and listed as Grade II is at risk. Document APP-011 3 (Document: 2.2 Land Plans - Section C) indicates that it sits within an area of compulsory purchase (C-16/1), it is impacted by the above vibrations concern and LBPC are generally concerned that the sheer volume of traffic could result in accidental damage through construction traffic not only related to NG	6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by vibration from the Project. The vibration assessment identified one historic structure, the Grade II listed Little Bromley War Memorial, in Tendring (Little Bromley Parish) that has potential to be impacted. As this is not a residence, the Applicant considers the current approach in H07 and the associated NV04 (7.2 Outline Code of Construction Practice (Revision C)) to be appropriate. H07 – ‘<i>Commitment NV04 will be applied in relation to any designated historic buildings with potential to be impacted by construction vibration.</i>’ NV04 – ‘<i>Where there is potential for works to generate vibration at, or approaching, levels exceeding 12.5 mm Peak Particle Velocity (PPV) at buildings or structures (or lower levels if the building or structure is deemed particularly sensitive to vibration), pre and post work condition surveys will be conducted. Any damage (cosmetic or otherwise) deemed to be caused by the works will be rectified.</i>’

Topic	Comment	National Grid's response
	but also from the other NSIPs and residents/ visitors to the area all trying to use Bentley Road at the same time. The general setting of the war memorial within Little Bromley including its outlook on a "heritage hedge" is particularly notable however, from Document: 2.16 Trees and Hedgerows to be Removed and or Managed Plans – Section C, it seems that this "heritage hedge" will be removed.	
Transport and Traffic	Cumulative and non-NSIP traffic: APP-275 Document: 6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects (Image A16.4.30) shows NG HGV and LGV traffic peaking at over 850 vehicles per day along Bentley Road with more than 18 months of the construction period seeing more than 400+ HGV and LGV vehicle movements. LBPC are very concerned by this volume of traffic along a usually rural and quiet road with very little HGV traffic currently due to the 7.5T weight limit. We question	The Applicant is aware of the 7.5T weight restriction on Bentley Road. The Applicant has assessed the suitability of the route for construction traffic and has not identified a structure where the weight limit of the proposed HGVs is a concern. The Applicant is proposing to use Bentley Road for the purpose of loading and unloading, and as a result would be compliant with the exemption sub-plate. 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] details that during the worst-case peak week of construction, there would be 25 HGV movements and 162 LGV movements in both the AM and PM peak hour on Bentley Road. However, this would be over a short duration of one week. Outside of peak activity the construction vehicle movements would fluctuate but be lower than the worst-case peak week, as shown on Image E.30 found within 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has completed a worst-case construction trip generation assessment, where the highest volume of traffic associated with each construction activity has been undertaken. It is not expected that the authorities and agencies travelling to site will do so within the peak hours and are therefore not included within the assessment numbers. 7.3 Outline Construction Traffic Management Plan - Appendix B - Construction Worker

Topic	Comment	National Grid's response
	whether the stated figures take into account nonNG "controlled" traffic including authorities and agencies visiting/attending site to monitor works, to deal with inevitable issues and liaise with NG contractors?	Travel Plan [APP-311] provides detail on the indicative mitigation measures for visitors to site, which includes car sharing and monitoring of parking spaces.
Cumulative Effects	What about the cumulative traffic figures generated by the North Falls and Five Estuaries NCIPs as well as Tarchon?	6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] includes committed developments combined with the Project flows. Where required, mitigation measures (for example road widening and shared pedestrian and cyclist facilities) have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts. These include both Nationally Significant Infrastructure Projects North Falls and Five Estuaries Wind Farms. No significant impacts are expected as detailed within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] when taking account of the mitigation measures identified within 7.3 Outline Construction Traffic Management Plan (Revision B). The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and no traffic information is yet available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application.
Landscape and Visual	Severe permanent impact to character of Little Bromley: Bentley Road is a currently	The Applicant does not agree with the characterisation asserted by the Parish Council. The Applicant has considered the impact on all users of Bentley, both motorised and non-motorised. The widening proposed is only in limited specific areas where HGVs are

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	narrow and winding country road with mature trees and hedgerows which takes users (including walkers, cyclists, horseriders) from homes, footpaths and other entrances along its length into Little Bromley or in the reverse direction connecting to Cycle Route 51 on the opposite side of the A120. It is proposed that this currently characterful road which by its nature has a naturally traffic calming effect will be permanently widened and straightened, losing many of its mature trees and hedgerows which serve not only as important habitats but also act as windbreaks to prevent topsoil erosion from the surrounding fields. This proposed widening and straightening of sections of Bentley Road, the removal of mature trees and hedgerows alongside (including opposite the War Memorial) will result in permanent loss and disfigurement to the landscape	unable to pass safely as the road current stands. We are also proposing to provide a temporary Non-Motorised User (NMU) route along Bentley Road to facilitate NMU movements along Bentley Road, with the Applicant following LTN 1/20 guidance⁵⁵. This takes the form of a separated pedestrian and cycle way with new hedgerow planting and screening running from the village of Little Bromley to the A120 where it joins the existing Cycle Route. Bentley Road is proposed to have a permanent speed reduction to 30 mph between TR C-069 and TR-C-071 and a permanent speed restriction to 40 mph between points TR C-071 and TR-C-073. Details of these restrictions are included in Section C, Sheet 16 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035]. Potential impacts on hedgerows and trees as a result of proposed works to Bentley Road are assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The extent of vegetation removal identified is considered a worst-case position; a detailed design process (post consent) would be undertaken to retain trees/hedgerows where practicable. Mitigation measures, including replacement planting, are set out within the 7.4 Outline Landscape and Ecological Management Plan (Revision D). For any habitat that cannot be replaced in situ, off-site habitat mitigation measures are proposed as set out within the 7.1 Biodiversity Net Gain Report [APP-299]. The Applicant has committed to delivery of 10% Biodiversity Net Gain with wider environmental and societal benefits. This replacement planting will also limit changes in terms of the potential for soil erosion by wind. The Applicant notes the concerns raised by Little Bromley Parish Council. It is recognised there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance), including within Little Bromley parish, along Bentley Road (see above comment for more information).

⁵⁵ Department for Transport (2020) *Guidance: Cycle infrastructure design (LTN/20)*

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	which is currently enjoyed by many.	
Transport and Traffic	Permanent access road siting in the centre of the Little Bromley: the siting of a permanent access road from the centre of Little Bromley to the EACN is of particular concern. LBPC and residents' concerns and suggestions of alternatives seem to have been ignored. The only change seen in NG's Targeted Consultation was a minor repositioning of the road to better follow a field-edge. A sensible alternative that does not appear to have been explored would be to construct a permanent road off the A120 bypassing the village and outlying homes entirely. Of course, any permanent feature should be suitably screened and mitigations put in place. Having a permanent access road in the centre of the Little Bromley village with its 4 entrance close to the protected war memorial between two 90 degree bends and in clear view and in close proximity to a number of homes does not seem to be the obvious choice.	The Applicant notes Little Bromley Parish Council's concern regarding the proposed access arrangement to the East Anglia Connection Node (EACN) Substation. However, the Applicant emphasises that alternative access arrangements have been considered. As set out in Table 3.19 of 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127], access approaches for the EACN Substation have been considered from the A120/Harwich Road roundabout, A120/Park Road junction, and via the B1035 Clacton Road. From this assessment, the proposed access route via Bentley Road was found to be preferred based on the utilisation of a greater extent of existing infrastructure, and therefore reduced identified land take requirements and environmental impacts in comparison to the identified alternatives. This is set out under paragraph 3.8.15 of 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]. Additionally, as mentioned in the Little Bromley Parish Council commentary, following further engagement with impacted landowners a modification of the proposed permanent private access road has been put forward by the Applicant under 9.2 Notification of Proposed Change to DCO Application – Change Request 2 (Little Bromley) [AS-050]. In terms of the proposed access point on Bentley Road described in the Little Bromley Parish Council commentary, this location is shown in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315], Sheet 15 as Bellmouth JC-B072. Outline design for this proposed access has been developed in line with the principles set out in 2.6.3 Design and Layout Plans – Traffic and Transport [APP-043], which includes the provision of suitable visibility splays. This proposed access has further been subject to a Road Safety Audit overseen by Essex County Council as the Local Highway Authority, in line with the strategy set out in Section A.3 of 7.11 Transport Assessment – Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. Within this document, the safety audit for Bellmouth JC-B072 is denoted in Table A.27 on page A40.

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Biodiversity, ecology and nature conservation	Unquantified loss of trees and hedgerows: whilst NG documentation does appear to identify some trees/hedgerows that are at risk of removal, we have not been able to assess whether other arboreal management is proposed e.g. removal of individual mature tree branches over roads or thinning of hedges to allow passing of vehicles that are wider/taller/more numerous than usual. Clearly this will not only change the character of country roads (e.g. where there are natural arboreal tunnels or natural shade) but will also increase the biodiversity loss and flood risk which could yet be unquantified. If any tree/hedge reduction is required then this should be done sympathetically and at the correct time of year to minimise stress and risk of disease to what remains.	Full details on the trees and hedgerows to be affected by the Project around Little Bromley are presented on 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section C [APP-050]. Through routing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on tree and hedgerow habitats including around Little Bromley. The design process has taken account of existing biodiversity and, where practicable, seeks to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors including trees/hedgerows. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys were undertaken, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce impacts on valuable habitats. Where practicable vegetation removal/management will be undertaken within the dormant period, between late autumn and March, to minimise the stress and risk of disease and to avoid the key nesting bird season of March–August. Commitment GG31 in 7.2 Outline Code of Construction Practice (Revision C) confirms that an Arboricultural Method Statement will detail the appropriate mitigation measures when working near trees. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and not expected until May 2026). The Applicant has committed to delivering 10% BNG with environmental and societal benefits on all construction projects. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Water environment	Groundwater disturbance and contamination: residents in Little Bromley who rely on well water as they sole source of drinking water remain concerned about contamination	The groundwater risk assessment included as 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184] provides an assessment of the potential for impacts related to the construction of the Project, on the groundwater and groundwater receptors identified within the Study Area. This includes information obtained from Tendring District Council for private water supplies in the Little Bromley area. The assessment has concluded that

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	risks from construction work and high volumes of traffic. Any trenching or digging could also affect water tables or the flow of water.	the Project is not anticipated to have any impacts on groundwater quality, levels or flow at this location and therefore impacts on the private water supplies are considered unlikely.
Land use	Loss of prime agricultural land: considerable loss of prime agricultural land in Little Bromley including at Norman's Farm	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] including where relevant in Little Bromley Parish. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Little Bromley Parish (Grade 2). All land temporarily required would be reinstated in line with 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303], including land required for haul roads. The Outline Soil Resource Plan also details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), or the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. Temporary disruption to farming operations during construction (including disruption from haul roads) would be reduced through good practice, such as: maintaining/ providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.4 Outline Code of Construction Practice [REP2-014]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example in relation to temporary land take, reduced yields due to irrigation disruption, etc.). The Applicant recognises concerns that electricity infrastructure and associated rights may result in long-term restrictions on land use and agricultural productivity. In developing the Project, the Applicant has sought to minimise such effects by limiting permanent land acquisition and instead relying, wherever practicable, on the acquisition of defined rights rather than full ownership of land. The rights sought are confined to those necessary for the safe construction, operation and maintenance of the assets and are designed to enable the continued agricultural use of land beneath and around the infrastructure. The majority of

Topic	Comment	National Grid's response
		affected agricultural land would remain in productive use following construction, subject only to proportionate restrictions that are typical for high voltage transmission infrastructure, such as adhering to safety clearances.
Land and Property	Impact on house prices: house prices are already being detrimentally affected and this will be an issue for almost every homeowner in Little Bromley, yet no offer of amelioration or a compensation scheme has so far been communicated.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes; however, there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, and national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaully-Denny 2024 report was commissioned by Scottish Renewables and conducted by BiGGAR Economics⁵⁶. The report focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers, and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: • House prices in affected areas (Highland, Perth and Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaully-Denny power line • Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.

⁵⁶ BiGGAR Economics (2024) *House Prices: Impact of Beaully-Denny Grid Infrastructure*

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Cumulative Effects	Proximity to other electricity infrastructure: the close proximity of the EACN to the proposed Battery Energy Storage System (BESS) near Arleigh with its li-ion batteries and the risks of “thermal runaway” should not be overlooked with cumulative impacts being considered and not underestimated.	The proposed Battery Energy Storage System (BESS) is located to the south of Little Bromley Road to the west of the UK Power Networks substation well over 100 m from the East Anglia Connection Node (EACN) which is located to the north of the road. There is no risk of interaction given this distance and the fire control measures in place. An assessment of inter-project cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025.
Draft DCO	We are concerned that the above adverse effects for Little Bromley may only be the tip of the iceberg. As a small community we do not have the resources to be able to trawl through the library of DCO documents and 1000s of pages in the time available. We are therefore reliant on the Planning Inspectorate to properly interrogate all the information NG have provided.	The Applicant would note there have been several rounds of consultation (starting in 2022 and most recently with a targeted consultation just concluding in 2026) with information presented covering siting studies, the basis for change (or not), preliminary environmental information and the Environmental Statement with clear signposting to location specific material.
Alternatives	LBPC are concerned that NG haven't properly considered or evidenced their site selection process. The former RAF Boxford was the only other site considered but it is unclear how the EACN was selected despite the alternative site being close	The respondent is directed to review the material within the 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] and in the 5.15 Design Development Report [APP-122] which fully explains the site selection for the East Anglia Connection Node (EACN) and reasons why the site is preferred to others. Overall, alternative locations for the EACN Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Arleigh balances the effects arising from connection corridors and substations for the

Topic	Comment	National Grid's response
	to the A12, adjacent to existing energy and transport corridors and significantly closer to the core N2T alignment. The vague selection "balance of considerations" rationale is not sufficiently transparent. We fully support Tendring District Council in challenging the site selection	Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 there were alternatives considered that would avoid routeing through the National Landscape.
Planning Policy	In addition, the EACN site selection does not appear to align with the requirements of the Horlock Rules which include: • avoiding high-amenity landscapes • taking advantage of natural landform and vegetation • minimising visual impact on settlements • avoiding cumulative industrialisation • ensuring overhead line connections can be sensitively integrated The proposed EACN site at Ardleigh is on flat, open countryside with no natural land features providing suitable	The Applicant disagrees that the Horlock Rules have not been considered. 7.18 2022 Corridor and Preliminary Routeing and Siting Study [APP-356], 7.20 2023 - Design Development Report for the Project [APP-358], 7.21 2024 - Design Development Report for the Project [APP-359], and 5.15 Design Development Report [APP-122] published with the application for development consent, all set out how the Horlock Rules informed decision making. We use the Environmental Impact Assessment process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Horlock Rules typically involves balancing alternative solutions which can present conflicting Horlock Rules compliance albeit that all aspects have been considered.

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	screening. The cumulative impact of the EACN, Five Estuaries, North Falls, Tarchon converter station and pylons is extreme and cannot be reconciled with Horlock principles. Ardleigh is the wrong location for the EACN.	
Planning policy	5. Conflicts With the Tendring Local Plan the Local Plan identifies Small Rural Settlements where only modest, sustainable development is appropriate. Major industrial-scale energy infrastructure is incompatible with: • policies on landscape protection • heritage conservation • agricultural land safeguarding • rural settlement character NG proposals directly undermine these objectives and would permanently negate years of community-led planning.	The Applicant notes this comment. Whilst the Project will be considered against the policy context contained in National Policy Statements EN-1 and EN-5, consideration has been given to the Adopted Tendring Local Plan, emerging Tendring Colchester Borders Garden Community Plan and relevant Neighbourhood Plans, particularly where they contain policies that may be a material consideration in the determination of applications for development consent. Further details are presented in 5.6 Planning Statement [APP-085] and 5.7 Policy Compliance Document [APP-086] which have been submitted with the Development Consent Order application.
Socio-economics	There has been no assessment of the impact these proposals will have, specifically on the community of Little Bromley	Socio-economic impacts on the community facilities, businesses, recreation and tourism assets are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . The chapter concludes that there would be no

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Recreation and Tourism	and the effect on the lives of the people who live there; the societal costs the mental health impacts as well as the actual financial costs of devalued house prices, disruption to businesses, etc. It seems inconceivable that there could not be a way of delivering the nationally significant infrastructure required by this project without such wholesale devastation and destruction.	significant adverse effects on the community facilities, businesses, recreation and tourism assets within Little Bromley Parish Council as a result of the Project. In addition to the Environmental Statement, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The government has published its guidance on community funds for transmission infrastructure. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure: Guidance⁵⁷. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the Environmental Impact Assessment. Commentary on mental health is provided below.
Health and Wellbeing	the mental health impacts	The Applicant recognises that the Project would have an impact on people within the Little Bromley area who live in the vicinity of the proposed route, both during the construction and operation (and maintenance) phases. An assessment of the impacts of the Project on mental health and wellbeing during both construction and operation phases is contained in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. Construction activities have the potential to cause disruption and this can potentially impact people's wellbeing through ongoing stress and anxiety. The Applicant has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential construction impacts are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure

⁵⁷ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
		information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change and this would be the case for some residents within Little Bromley Parish. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health effects during the construction phase, although it is noted that impacts are likely to be experienced differentially by local residents according to factors such as where they live, or their outlook. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time. There is likely to be a small minority of the population who experience adverse effects as a result of changes to visual amenity; however, this is not expected to result in a significant health impact.
Alternatives	Alternative proposals of a technical nature, such as whether the most appropriate solution is underground cables or pylons, subsea cabling or	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with

Topic	Comment	National Grid's response
	HVDC onshore are clearly very difficult matters for us as a small parish council to meaningfully assess or comment on, but NG have not even considered them.	change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Cost	NG appear to have decided on the use of pylons, the route of the pylons and the siting of the EACN based purely its submission that it is the cheapest to build with no consideration given to human and environmental costs. NG's fiduciary duties to make profits for shareholders are in conflict with the sweeping powers of a nationally significant infrastructure project	The estimated costs for each strategic option considered by the Applicant are set out in 7.17 Strategic Options Backcheck and Review [APP-355]. This assessment reflects updated cost and technology information, together with changes in the planning and regulatory framework. Where the costs of more minor elements are unlikely to be differentiating between strategic options, these have not necessarily been included. Throughout the development of the Project, the Applicant has engaged proactively with government and regulators on policy and cost considerations associated with new infrastructure. The Applicant continues to monitor technological developments, actively exploring innovations and alternative technology types, which are assessed for their suitability and applicability to the Project. A range of alternative technologies has been investigated and is documented within 7.17 Strategic Options Backcheck and Review [APP-355]. These include an offshore connection using direct current (DC) technology, as well as a range of onshore connection options. The onshore alternatives considered comprise increasing operational voltages on the existing network above 400 kV; alternating current (AC) overhead lines (an established technology); alternative pylon designs; AC underground cables; high voltage direct current (HVDC) overhead lines and underground cables; and gas insulated line technology.
N/A	7. Requests of the Planning Inspectorate Specific hearing for EACN affected parishes - as the EACN location and effects are specific to Little Bromley and neighbouring parishes including Ardleigh, we	The Applicant acknowledges the points raised in these sections, which are directed at the ExA or which summarise the points raised above and are responded to in this table.

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	request that a hearing is dedicated to dealing with discussions on this topic as well as the cumulative impacts of other NSIPs to the same area. • EACN location site visit – we invite the Planning Inspectorate to make a site visit to the proposed EACN site and the surrounding area. LBPC will be happy to help facilitate and to work in conjunction with other neighbouring impacted parishes. 8. Conclusions We ask the Planning Inspectorate to give full weight to: • the destruction of Little Bromley that this proposed NG NSIP and the cumulative impact with others will unnecessarily inflict; • the flawed site-selection process and disregard for established siting rules; • non-compliant consultations; • conflict with statutory planning policy;	

Topic	Comment	National Grid's response
	• demonstrable environmental and heritage harm; • unacceptable cumulative impacts; • availability of viable, lower-harm alternatives. Little Bromley Parish Council strongly objects to the Norwich–Tilbury proposals affecting the village of Little Bromley and surrounding area and urges the Planning Inspectorate to: 1. Reject the proposed siting of the EACN and associated infrastructure in Ardleigh/Little Bromley; and 2. Request and require NG to undertake a full alternative assessment, including offshore and brownfield options.	

2.38 Little Horkesley Parish Council

- 2.38.1 Table **2.38** below outlines the Applicant's comments on the Relevant Representation (RR) provided by Little Horkesley Parish Council **[RR-2173]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.38 Comments and National Grid's response

Topic	Comment	National Grid's response
Planning Policy	The proposals as set out breach national policy, fail statutory duties, and cannot lawfully or ethically be approved. They must therefore not be recommended by the Planning Inspectorate.	The Applicant, whilst noting the respondent's feedback, disagrees and consider its proposals to be lawful and consistent with National Policy, our duties and regulatory requirements. Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by National Planning Policy Statements EN-1 (2024) and EN5 (2024). However, national planning policy in the form of the National Planning Policy Framework⁹ (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies.
N/A	I also state my full support for the comprehensive submission made by Villages Against Pylons.	The Applicant has responded separately to this submission [REP1-282] in 8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings (Final Issue A) [REP2-028] .
Landscape and Visual	1. Breach of National Policy and Statute NPS-EN5 (paras 2.9.12 & 2.9.21) requires applicants to avoid entirely National Landscapes such as the Dedham Vale and, where avoidance is impossible, to	The Applicant notes the concerns raised by Little Horkesley Parish Council in relation to the Project and Dedham Vale National Landscape. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way¹. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes.

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	underground lines unless engineering infeasibility or greater harm can be proven. Even “residual impacts” may make a scheme unacceptable in planning terms. Redrafting of NPS in 2024 made it explicit that impact upon the Dedham Vale can be caused by infrastructure beyond its boundaries and set the requirement that any cables which impact the Vale should be undergrounded save for where it is infeasible in technical terms or where to do so would be more harmful than using Pylons.	In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. The Applicant also has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to ‘further the purposes’ of the National Landscape. The Applicant confirms that this duty has been fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term ‘harm’) on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect arising from infrastructure proposed outside the designated area. The LVIA included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3). 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on DVNL. The assessment was undertaken taking into consideration the Special Qualities, which describe which aspects of natural beauty are important in the DVNL. Section 13.5 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] sets out the method of approach for assessing effects of the Project on Dedham Vale National Landscape. The assessment was undertaken with reference to NatureScot’s Special Landscape Qualities Guidance³ on assessing effects, the principles of which can be applied to developments outside of Scotland.

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		The assessment was also informed by a Position Statement from the Dedham Vale National Landscape Partnership⁶. The Position Statement clarifies that: '<i>The National Landscape Partnership...considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in substantial impacts, positive or negative, on the natural beauty and special qualities of the AONB.</i>' [emphasis added]. It is considered (as informed by paragraph 5.10.34 of NPS EN-1 (2024)) that the reference to 'substantial' impacts here is taken as meaning the 'likely significant effects' identified through the EIA for the Project. An assessment of 'Harm' is not reported in a Landscape and Visual Impact Assessment (LVIA), the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁵, as part of the Environmental Impact Assessment (EIA) process. Consideration of harm is taken into account in the planning balance, given use of the term in the policy above. The purpose of a National Landscape is to '<i>conserve and enhance natural beauty</i>', as set out in the Countryside and Rights of Way Act 2000. The Special Qualities of Dedham Vale National Landscape (DVNL) explain the aspects of natural beauty which are important for this nationally protected landscape. When considering effects on Special Qualities, the long-term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute 'harm' to these Special Qualities. There will be short to medium-term significant effects on the Special Qualities of DVNL during construction and after reinstatement, as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. This is because of the time it takes grassland to establish across disturbed areas, and for hedgerows and trees to grow. As reported in 5.6 Planning Statement [APP-085] Embedded mitigation has sought to minimise landscape effects as far as practicable.

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		The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that <i>'virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape'</i> and paragraph 5.10.13, that <i>'all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'</i>. For CNP infrastructure, <i>'the need case will outweigh the residual effects in all but the most exceptional cases'</i> (paragraph 4.1.7 of NPS EN-1 (2024)).
Cost	Cost is not a relevant factor in the terms of NPS-EN5 when pylons would harm the Dedham Vale and the policy is explicit in stating that rerouting must occur even if cost is greater and route longer.	The Applicant notes the respondent's feedback. Cost is one of many factors that was considered in making decisions on the Project as guided by our duties under the Electricity Act 1989. The NPS EN-5 (2024) makes it clear that the Government considers overhead lines to be appropriate and acceptable in most instances. However, the Government is aware that overhead lines may not be appropriate in particularly sensitive areas. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting¹⁸). Its aim is to ensure that decisions regarding the project's design (route, location, or technology option) are based on a full understanding and balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. The consideration of cost within the decision-making process is therefore one of our statutory duties and is not something that we could make representation to the Office of Gas and Electricity Markets (Ofgem) to waive.
Landscape and Visual	The Levelling-up and Regeneration Act 2023 (s.245) imposes a statutory duty to conserve and enhance natural beauty, applying not only within National Landscapes but also to any development that affects them. Damaging the Dedham	The Applicant recognises its duty to seek to further the purposes of the Dedham Vale National Landscape introduced by the Levelling-up and Regeneration Act 2023 and incorporated into section 85(1) of the Countryside and Rights of Way Act 2000 (CROW Act). The section 85 duty does not prohibit development or activities within the National Landscapes, nor indeed does it prohibit development that causes harm to a National

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	Vale can hardly be consistent with the need to conserve or enhance it. Even if enhancements are made elsewhere the need to conserve stands in its own right. The current proposal fails both tests. National Grid acknowledges that its pylons and compounds will be visible from within the Dedham Vale, causing negative effects on its "special qualities", including the Constable landscape. Harm that is both predicted and avoidable cannot satisfy the duty to conserve or the policy requirement to avoid residual impact.	Landscape. The core legal framework for decision making on a development consent application remains section 104 of the Planning Act 2008 (please see the Planning Statement [APP-085] for further details on the core decision making framework applicable to the Application). The Defra guidance (Defra, 2024) states the duty '<i>does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities</i>'. It remains the case that decision makers can make decisions that impact designated landscapes, but they are required to show that they have taken steps to seek to further the purpose of conserving and enhancing natural beauty. Case law clearly supports this interpretation of how the duty operates, in a recent judgment (Campaign for the Protection of Rural England (CPRE) v Secretary of State for HCLG [2025]), the High Court confirmed that the duty does not require a refusal of planning permission where there is harm to the National Landscape. Mr Justice Mould confirmed '<i>The language of section 85(A1) of the 2000 Act imposes no prohibition on the grant of planning permission for development which fails to conserve and enhance the natural beauty of a protected landscape</i>'. The approach set out by Mr Justice Mould '<i>recognises that in a case where development is found to result in harm to the natural beauty of a protected landscape, the duty imposed by section 85(A1) of the 2000 Act requires certain matters to be addressed by planning decision-makers. It is an approach which is essentially reflected in the guidance issued by DEFRA in December 2024</i>'. He said matters should be expressed in terms of weight, and that the '<i>duty does not and is not intended to displace the established evaluative character of the determination of planning applications, which arises from the long established principles that govern such decisions under sections 70 of the 1990 Act and 38(6) of the 2004 Act</i>'. Whilst the above case law has related to decision making under the Town and Country Planning Act 1990, the principles in relation to the duty to seek to further the purposes are considered broadly applicable for decision making under the PA 2008.

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		NPS EN-5 (2024) was adopted after the strengthened duty came into force and provides a clear direction as to the form infrastructure should take in paragraph 2.9.20 which states, 'Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)'. Paragraph 2.9.22 goes on to state '<i>Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape</i>'. This paragraph again recognises there is no prohibition to development within the National Landscape, indeed it is expressly addressing the scenario where electricity infrastructure development will take place in the National Landscape. The developer's discharge of the duty to seek to further the purposes is to be considered in that context and the case law relating to the duty. Details on how the Applicant has sought to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the CRow Act is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Project has been sited and designed to reduce the potential for adverse effects on the Dedham Vale National Landscape designation and alterations of its special qualities, as far as practicable. Project cables will be laid underground within the National Landscape and its setting, where there is potential for significant effects on the designation in accordance with national policy (paragraph 2.9.20 NPS EN-5 (2024)). The National Landscape Assessment Study describes the effects of the Project on the Dedham Vale National Landscape during construction and operation (APP-235). In addition to taking the National Landscape into consideration through all stages of the Project design, in line with the Defra guidance additional 'appropriate, reasonable and proportionate steps' are proposed in respect of the duty to seek to further the statutory purpose of the National Landscape. The additional measures have been identified in collaboration with the National Landscape Partnership and following engagement with the relevant Local Authorities. The additional measures include:

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		• A financial contribution in the form of the Dedham Vale National Landscape Fund • Undertaking/commissioning an initial feasibility study into the potential future removal of an existing UK Power Networks 132 kV overhead line (known as the PJ Line). The Dedham Vale National Landscape Fund will be utilised by the National Landscape Partnership to deliver benefits and provide enhancements to further the statutory purpose of the National Landscape. A potential list of projects has been created and provided within Annex A of 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant considers the approach taken to the Project and measures identified meet the requirements of section 85(1) of the CRow Act, and are appropriate, reasonable and proportionate in accordance with NPS EN-1 (2024) and the Defra guidance. This approach is also consistent with other DCO decisions in respect of the section 85 duty including Lower Thames Crossing and Rampion 2 Offshore Wind Farm. The assessment of effects of the Project on the Special Qualities of Dedham Vale National Landscape (DVNL), including those linked to the famous artist John Constable, is presented in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The Project would result in significant adverse effects on some of the special qualities of the DVNL during construction. During operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be not significant. The effect of construction activity on the special quality '<i>Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today</i>' is assessed as a major and significant (adverse) effect, localised along the length of the underground cable corridor in the short to medium term. At operation (and maintenance) it is considered that there would be a minor and not significant (adverse) on this special quality. The fact that the Project will be visible from within the DVNL is not disputed. Figures A13.5.6 to A13.5.12 contained within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility related to the Project within 5 km of Dedham Vale National

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		Landscape because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. For example consideration of effects on Viewpoint 3.20 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 132. Viewpoint 3.20 is within DVNL, approximately 4.24 km from the nearest above ground structure of the Project and represents is a locally promoted view looking south over the Stour Valley, in an area associated with Constable. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
Alternatives	National Grid's own Strategic Options Backcheck and Review identifies EAS1, a southern route that meets all project requirements, entirely avoids the Dedham Vale, and is around £140 million cheaper over its lifetime. The terms of NPS EN5 require that such route be adopted over one which impacts the Dedham Vale. The current route must be abandoned and a better route away from the National	Unfortunately the respondents position does not represent a comparison of like for like solutions in terms of meeting the Project need case, and the Applicant maintains it position that the Project is the most appropriate means of doing so. In regards to EAS1, the various SOBRs have set out why this option was not progressed. This is because whilst it facilitates resolution of the boundary reinforcement aspect of the need case, it does not facilitate the connection of the windfarms and interconnectors (North Falls, Five Estuaries and Tarchon). To address this, to make the solutions comparable, adds an estimated £500m which is significantly greater than the differential between the EAS1 and EAS2 (the option progressed). This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the

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	Landscape and ideally making use of brownfield sites found. No appropriate consultation in respect of meaningful alternatives has been held. EAS1 together with other routes were revealed only after National Grid had already settled on its Norwich to Tilbury corridor, were withheld from public consultation and rejected without transparent justification - contrary to Planning Act and the Gunning Principles, which require early, effective engagement and genuine consultation in respect of reasonable alternatives. This procedural defect alone renders the current route unsound.	Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Landscape and Visual	Between TB1 and TB49, the scheme would encircle the Dedham Vale in a "ring of steel" given the presence of existing lines to the north and east of the Vale and forever damage the setting of an important National Landscape. All major routes in to and out from the Vale will pass beneath or have	The Applicant notes Little Horkesley Parish Council's concerns about proposed pylons TB1 and TB49 to the south of Dedham Vale National Landscape (DVNL). The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the

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	views of Pylons which cannot fail but damage its setting.	immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant's position is this is not justified. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on Dedham Vale National Landscape. This includes a total of approximately 20 km of underground cable through and in the vicinity of the DVNL, including a section at Great Horkesley to reduce the changes in views and setting of the AONB from within and adjacent to its designated boundary. The Applicant has fulfilled the duty under Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. Please refer to the response above for details of the landscape and visual effects on the DVNL and its setting which are reported to be not significant during operation. It is important to note that perceptions of being encircled / surrounded when viewing the Project on maps are very different from the actual local context. Where there are proposed sections of overhead line south of Dedham Vale National Landscape the closest proposed pylon is approximately 1.3km. People travelling along roads crossed by the proposed overhead line would be travelling for a range of distances and past other modern-day features before entering the National Landscape. The assessment recognises there will be some views of sections of the overhead line from Dedham Vale National Landscape; however, these are not judged to have significant effects on the special qualities of the National Landscape over the longer term, as explained in Table A13.1.3 on page 17 onwards of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].

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Land use	More than 10 km of hedgerows and 500 acres of farmland in the area would be destroyed, fragmenting habitats for otter, water vole, bats, newts, red kite, and owl.	The Applicant does not recognise the figures stated by Little Horkesley Parish Council, the actual habitat impacts are included within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. It should be noted that these assessments are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to hedgerows will be minimised as far as practicable. The 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and 7.2 Outline Code of Construction Practice [REP2-014] both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats hedgerows, where practicable. 7.4 Outline Landscape and Ecological Management Plan [REP2-018] sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species (such as otter, water vole, bats and birds) as agreed with Natural England and Local Planning Authorities. On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting has been proposed within Environmental Areas surrounding the permanent National Grid asset. Illustrative landscape designs for these areas have been provided within 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Little Horkesley Parish (Grade 3a). During the construction stage of the Project, there would be

Topic	Comment	National Grid's response
		areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Little Horkesley Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Biodiversity, ecology and nature conservation	The corridor also lies within the East Atlantic Flyway, one of seven UK sites proposed for UNESCO World Heritage status—an international conservation interest that NPS-EN1 5.10 and NPS-EN5 2.9 require to be protected.	The proposed UNESCO World Heritage East Coast Flyway is largely defined by designated sites of International Importance including Special Protection Areas (SPA) for avian interest, Ramsar Convention Wetlands and Special Areas of Conservation. The effects on such 'European Sites', including an assessment on collision risk, is presented within 5.3 Habitats Regulations Assessment Report [APP-082]. The Project is outside the Impact Risk Zone for most coastal European Sites, however the Stour and Orwell Estuaries SPA/Ramsar was considered at Stage 1 Screening and Stage 2 Appropriate Assessment within the 5.3 Habitats Regulations Assessment Report [APP-082]. Vantage point surveys did not identify areas of notable concern with regards to collision with overhead line sections within the Impact Risk Zone of the Stour and Orwell Estuaries SPA/Ramsar, however on a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at Ardleigh Reservoir. Functionally linked land for lapwing and golden plover was identified in the vicinity of the River Stour through wintering bird surveys. This area is proposed for underground

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		cabling. It was demonstrated at Stage 2 Appropriate Assessment, that there is extensive alternative habitat for these species within the River Stour catchment and as the works are temporary at this location (with habitats reinstated following installation of underground cables), there would be no adverse effects on the integrity of the Stour and Orwell SPA/Ramsar site. This conclusion was agreed with Natural England. Overall, the evidence indicates the Project does not pose a significant collision risk, nor does it compromise established movement corridors for migrating and commuting birds.
Historic Environment	Archaeological work has revealed Bronze-Age urnfields, Saxon and Roman remains, including burial vessels beside the proposed Western Sealing End Compound (SEC). Numerous listed buildings with important and historic views in to and out from the Dedham Vale would lose the open agricultural settings central to their significance. The cultural, visual, and ecological harm would be irreversible.	The Applicant fully recognises the importance of safeguarding the historic environment, including archaeological remains, within Little Horkesley. Our approach is aligned with this principle. The approach concerning the archaeological remains set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation. The Applicant is confident that the physical impacts of the underground cable sections of the Project, such as at the proposed Western Sealing End Compound (SEC), on below ground archaeology have been assessed. Through the evaluation process appropriate mitigation will be determined and agreed with stakeholders. The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the views from and to heritage assets within the Dedham Vale area. The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting in this area. If the settings of some listed buildings fall partially within the Order Limits, it has been assessed within 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of designated assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of designated assets falls within the Order Limits. The Applicant

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		considers that the assessment of the historic environment has been proportionate and is appropriate within the framework of the DCO. Note: without further location information for the listed buildings it is not possible to comment more specifically on the respondent's concern. 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026] presents an impact assessment on ecology. The assessment concludes that with mitigation in place, which has been design in consultation with Natural England and Local Planning Authorities, there would be no residual significant effects.
Cumulative Effects	The EACN at Ardleigh and associated pylons (TB1–TB15) would be widely visible across the Dedham Vale. The presence of the EACN has already caused a growing number of industrial proposals including the siting of Tarchon and a proposal for an Asphalt facility will add further industrialisation. These are bound to continue and are entirely inappropriate for the setting in close proximity to the Dedham Vale. The impact must be seen cumulatively and these projects could not exist in isolation. Pylons here are admitted by National Grid to intrude on the most sensitive features of the Dedham Vale including landscapes associated with Constable.	The Applicant would correct the suggestion that the proposals by SRC for an asphalt plant are as a consequence of the EACN. The siting is entirely unrelated and does not arise as a consequence of the Project. Also as far as the Applicant is aware, there is as yet no confirmed proposed location for the Tarchon Interconnector so it is premature to assert they are inappropriately sited. Preceding answers also set out that visibility of pylons is not of itself unacceptable and also sets out the assessment in the context of the /special Qualities of the DVNL An assessment of Cumulative Effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter project cumulative effects assessment as of the 1 April 2025- which includes the North Falls and Five Estuaries projects. Since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination (as appropriate). The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages and no traffic information is yet available. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so

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		during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of its respective development consent application. Please refer to responses above for details of the landscape and visual effects on the DVNL, its special qualities, and its setting. With specific regard to the EACN Substation, this is approximately 1.3 km from the National Landscape boundary. The ZTV in 6.13.F12 Environmental Statement Figure 13.12 - ZTV of East Anglia Connection Node EACN [APP-248] indicates few publicly accessible locations within approximately 1.3 km to 3 km from which glimpsed views of the tops of taller equipment such as gantries within the substation may be possible. For example, Viewpoint 3.19 is approximately 2.44 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 3.19 can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230], pdf page 130. At this distance, effects are judged to be minor-moderate and not significant (adverse) during construction, at year 1 and also year 15 of operation.
Landscape and Visual	If an alternate route is not selected then the EACN must be relocated away from the Dedham Vale, ideally to a brownfield site. Any associated pylons which impact upon the Vale must be removed from the proposals and underground cables used instead in accordance with the requirements for those circumstances set out in NPS	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. █ █ The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former

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	EN5 section 2.9.21 5. Great Horkesley and the Eastern Sealing End Compound At Great Horkesley, the proposed section between TB15 and TB34, including the Eastern Cable Sealing End Compound, would introduce a major industrial structure into an area of open farmland forming the northern gateway to the Dedham Vale National Landscape. The terrain here is level and elevated, offering no natural screening, and the compound would be visible from the Essex Way, a nationally recognised long-distance footpath, and from numerous local dwellings.	Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN1 (2024) and NPS EN5 there were alternatives considered that would avoid routeing through the National Landscape. Similarly the positioning of the Great Horkesley (Tilbury side) CSE has been reviewed in response to feedback but remains unchanged. Whilst effects may be reduced for some receptors by a more southerly position, the Applicant's position is that there is not considered to be a need to change (see para 7.2.5 of APP-122 DDR 2025) and given the additional cost from a longer cable route this additional cost cannot be justified. The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant's position is this is not justified. The Applicant notes the concerns raised by Little Horkesley Parish Council. The Applicant has provided responses relating to Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) and to other similar points raised in previous responses.

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		The below text responds to points made about views of the CSE compounds and views from the Essex Way. The theoretical visibility of the Cable Sealing End (CSE) compounds at Great Horkesley are illustrated in 6.13.F13 Environmental Statement Figure 13.13 - ZTV of Great Horkesley EACN side CSE Compound [APP-249] and 6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250]. Paragraph 13.2.19 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] explains that these Zones of Theoretical Visibility (ZTV) indicate the theoretical visibility of these CSE compounds would be relatively extensive within 1 km, and more intermittent beyond 1 km. These CSE compounds are located approximately 1.3 km from the southern edge of Dedham Vale National Landscape. The landscape effects of the Great Horkesley CSE compounds (EACN side and Tilbury side) are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Rochfords Farmland Plateau Landscape Character Area (LCA) in paragraphs 13.3.513 to 13.3.527 (Tilbury side) and Great Horkesley Farmland Plateau LCA in paragraphs 13.3.528 to 13.3.542 (EACN side) . The topography of the plateau landscape is relatively flat as the Parish Council suggests. The visual effects of the Great Horkesley CSE compound (EACN side) are set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] under D1 Tye Green and Boxted (paragraphs 13.7.1 to 13.7.12) and D3 Great Horkesley and Horkesley Heath (paragraphs 13.7.25 to 13.7.40). The visual effects of the Great Horkesley CSE compound (Tilbury side) are set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] under D2 Little Horkesley and Wormingford (paragraphs 13.7.13 to 13.7.24), D3 Great Horkesley and Horkesley Heath (paragraphs 13.7.25 to 13.7.40), D5 Fordham (paragraphs 13.7.52 to 13.7.63) and D6 West Bergholt, Fordham Heath and Eight Ash Green (paragraphs 13.7.64 to 13.7.75). The VRA assessments do not identify and significant adverse effects on views from Dedham Vale National Landscape.

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		The visual effects of the Great Horkesley CSE compounds (EACN side and Tilbury side) in views from Dedham Vale National Landscape are also outlined in Table A13.1.1 on pages 10 to 12 of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The effects on views from the Essex Way are set out in paragraphs 13.12.84 to 13.12.121 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. To the east of Great Horkesley there would be close views of the Great Horkesley CSE compound (EACN side). Proposed mitigation planting around the Great Horkesley CSE compound (EACN side) is set out in 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. By operation year 15 the proposed mitigation planting associated with the CSE compounds will have reached semi-maturity and screen and filter localised views towards the Project. For example, Viewpoint 4.03 Broad Lane / Essex Way, east of Great Horkesley set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] assesses there would be significant adverse effects at construction and operation (and maintenance) year 1, which will reduce to not significant adverse by operation year 15 due to the mitigation planting.
Historic Environment	The site is also overlooked by several Grade II and II* listed properties whose settings depend on uninterrupted rural views.	The Applicant acknowledges that the setting of some Grade II and II* listed properties within Little Horkesley Parish could be disrupted by the Site. However, the Applicant considers that, whilst not desirable, the Project's interruption of the views across the setting of several Grade II and II* listed properties within Little Horkesley area does not equate to a high level of less than substantial harm. The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting in the Little Horkesley area. Document 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Horkesley Parish. The Project will not result in any substantial harm to designated heritage assets. During both construction and operation (and maintenance) phases, the setting of the historic environment within this area has been assessed. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11

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		- Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. Note: without further location information for the listed buildings, it is not possible to comment more specifically on the respondent's concern. Planning Statement [APP-85] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Landscape and Visual	The scale and character of the proposed works directly contravene NPS-EN1 and NPS-EN5 paragraph 2.9.19, both of which require the	The Applicant notes the concerns raised by Little Horkesley Parish Council but disagrees with this statement. The Applicant recognises that good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (EN-1 and EN-5) and the embedded environmental design mitigation as

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	avoidance of visual intrusion and cumulative industrialisation near designated landscapes.	part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure. As stated previously above, the Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. The reference to Paragraph 2.9.19 of NPS EN 5 (2024) relates to the Horlock Rules. the Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions. They also concern the siting of CSE compounds and line entries. The ExA will be aware that the wording of the paragraph referred to is not as absolute as inferred and instead uses qualifying phrases that recognise that a balance must be found with the use of “reasonably practicable minimum and ‘as far as reasonably practical’. The Applicant has applied this approach in the balanced manner intended. The guidance provided by the Horlock Rules has been applied throughout development of the Project. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [AP-356] published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]). Please refer to the response above for details of the visual and landscape effects on the DVNL, its special qualities, and its setting.
Landscape and Visual	National Grid has set out that is nothing which prevents in engineering terms the undergrounding of TB15-34 and therefore in policy term undergrounding must be extended from TB15 to TB34	The characterisation of ‘nothing which prevents it’ is not correct as the assessment has to reflect the narrow corridor width and constraints. There are restrictions that include a need to cross Ardleigh reservoir which in this case is unlikely to be achievable due to the depth required for the trenchless installed cables. It is also the case that other developments around Wick Lane do not leave sufficient space for underground cable. This was set out in Document 5.15 Design Development Report 2025 from paragraph 6.5.22 [APP-122].

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	thereby preserving the open visual approach to the Dedham Vale and maintaining compliance with the statutory duty to conserve and enhance natural beauty.	In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, at Great Horkesley having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] , 5.6 Planning Statement [APP-085] and 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP-139] .
Planning policy	Western Sealing End Compound at Little Horkesley The proposed Western SEC at TB35/36 sits on an exposed ridge plainly visible from across the Dedham Vale and from public viewpoints within the Vale. It contravenes Holford Rules 1 and 3 (avoid ridges and use landform for screening) and Horlock Rule 2 (avoid siting near designated landscapes) and fails to comply with NPS EN5 2.9.21. National Grid previously identified an alternative location south of the current TB40–TB42, much lower in elevation, naturally screened from the Dedham Vale by the Horkesley ridge and woodland. Relocation here would remove almost all visibility from within the Vale. The additional underground	The positioning of the Great Horkesley (Tilbury side) CSE has been reviewed in response to feedback received on a number of occasions but remains unchanged. Whilst effects may be reduced for some receptors by a more southerly position, the Applicant's position is that there is not considered to be a need to change (see para 7.2.5 of APP-122 DDR 2025) and given the additional cost from a longer cable route this additional cost cannot be justified. The Project was designed to minimise effects on Dedham Vale National Landscape (DVNL), including consideration of the Project within the National Landscape and its setting. The potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End (CSE) compounds to the north of Raydon airfield and at Great Horkesley. The assessment of effects of the Project on Dedham Vale National Landscape is set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. While there will be significant effects during construction due to the installation of underground cables, these will gradually reduce as vegetation cover re-establishes, and will become 'not significant' in the longer term. There will however be some significant visual effects on views looking outwards from the edge of the DVNL, where some of the proposed pylons would be visible.

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	length—stated by National Grid to be about 500 m—is trivial in both engineering and cost terms. In policy terms the Western SEC must be relocated from TB35/36 to beyond TB40 and undergrounding extended accordingly. This single change would eliminate residual visual harm, comply with NPS-EN5 2.9.21, and restore consistency with the statutory duty to conserve beauty	The Great Horkesley (Tilbury side) CSE compound is approximately 1.3 km from the National Landscape boundary. The ZTV in 6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250] indicates few publicly accessible locations within 1.3 km to 3 km from which glimpsed views of the gantries may be possible. Views towards the Great Horkesley (Tilbury side) CSE compound would be filtered and screened by existing tree cover and over time mitigation planting would increase screening. At worst effects relating to the Great Horkesley (Tilbury side) CSE compound would be negligible and not significant and as mitigation planting within the Environmental Area around the infrastructure matures there would be no visual effect. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant consideration of this duty is set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant is fully aware of and has considered the guidance of the Holford and Horlock Rules in developing its proposals. Firstly the guidance is more nuanced and for example refers to keeping environmental effects to a reasonably practical minimum rather than to a minimum. Residual effects stand to be considered in the planning balance but from a position where the Project has been identified as a Critical National Priority which means the residual effects are outweighed in the planning balance in "all but the most exceptional cases" - those exceptional circumstances being an unacceptable risk to defence, HRA sites / irreplaceable habitats. The documents 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford and Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Rules typically

Topic	Comment	National Grid's response
		involves balancing alternative solutions which can present conflicting Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Holford Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Holford Rule 2. A balanced decision is taken which is not the same as contravening the Rules.
Landscape and Visual	Fordham Valley is of special character and deserves its own protection. Within the Fordham Valley, the proposed pylons and overhead lines would impose particularly severe and unjustified visual, heritage, and landscape impacts. The valley's enclosed topography amplifies the prominence of any tall structure, and the line of pylons would cut directly across open farmland forming the traditional visual corridor between Fordham, West Bergholt, and the Dedham Vale National Landscape.	The Applicant notes the concerns raised by Little Horkesley Parish Council and assumes that the Parish Council's reference to Fordham Valley is made in relation to the River Colne tributary valley lying between Fordham and West Bergholt. In the context of all the landscapes considered in the LVIA, the relative value of this landscape is judged to be medium-high as represented by judgements made on the Colne Valley River Slopes (LCA A5) and Colne River Valley Floor (LCA A4). The basis for these judgements is contained within Table A29 (page A40) and Table A30 (page A41) in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Landscape effects are set out under the Colne River Valley Floors Landscape Character Area (LCA) and Colne River Valley Slopes LCA in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The assessment notes the introduction of the Project would be a prominent feature within the narrow, meandering river corridor (within the Colner River Valley Floors) and that pylons TB51 to TB53 would sit more prominently in the landscape due to their elevated position on the valley slopes and the edge of the plateau. There would be significant adverse effects on landscape character of the valleys in this area within 1.5 km of the Project Effects on the visual receptors within the Fordham Valley are set out under Visual Receptor Areas (VRAs) VRA D5 Fordham, VRA D6 West Bergholt, Fordham Heath and Eight Ash Green and VRA D7 Fordstreet and Aldham in paragraphs 13.7.52 to 13.7.87 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Viewpoints 4.24 and 4.25 presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] confirm there would be major significant (adverse) visual effects within 1.5 km of the Project including within the River Colne tributary valley lying between Fordham and West Bergholt.

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		Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Little Horkesley Parish. The Applicant acknowledges that the settings of some designated assets within Little Horkesley Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Horkesley Parish. The Project will not result in any substantial harm to designated heritage assets.
Historic Environment	The works would dominate the settings of several Grade I and II* listed buildings, including St Mary's Church (West Bergholt) and All Saints Church (Fordham), as well as Highfield Farm, Kings Farmhouse, and Fordham Place, all of which derive their historic value from open agricultural surroundings.	The Applicant has reviewed the assessment of St Mary's Church (1225120), All Saints Church (1239789), Highfield Farm (1225094), Kings Farmhouse (1266530) and Fordham Place (1222602) in light of the respondent's comments and agrees that the setting of Highfield Farm, Kings Farmhouse, and Fordham Place is informed by their location within a rural/agricultural area. However, the Applicant has concluded that the setting of the two churches does not extend to the Order Limits due to vegetation around them and topography. The setting of Highfield Farm (1225094), Kings Farmhouse (1266530) and Fordham Place (1222602), has been assessed by the Applicant. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment.

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		Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering Critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP Infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. Therefore, the Applicant is confident that its conclusions for these assets are proportionate and appropriate.
Landscape and Visual	Although not part of the Dedham Vale National Landscape itself, this valley is of equivalent beauty and value and deserves protection in the same way. NPS-EN1 and EN5 requires development protect the character and setting of heritage assets and instructs that routes should avoid skyline intrusion and visually sensitive valleys.	The Applicant confirms that detailed siting and routeing is informed by the guidance available in the Holford and Horlock Rules, the results of technical and environmental studies and fieldwork and the application of the mitigation hierarchy. The Applicant notes that balanced decision-making is required to consider the different combinations of effects and consequences. The Applicant starts from the policy position set out in NPS EN-5 (2024). This is clear on the strong Government starting presumption that overhead lines in general are appropriate. The River Colne tributary valley lying between Fordham and West Bergholt is not within a nationally designated landscape and not within the setting of a Nationally designated landscape. Therefore NPS EN-1 (2024) para. 5.10.34 and the reversed assumption to use underground cables as per EN-5 2.9.20 are not engaged. The Applicant also does not consider that the tests in NPS EN-5 paragraph 2.9.23 are engaged.

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		National Grid has undertaken a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Impact Assessment for the Project. The LVIA acknowledges that the Project would give rise to significant landscape and visual effects during both construction and operation. Mitigation measures relevant to landscape and visual effects are summarised in Environmental Statement Chapter 13: Landscape and Visual [APP-226]. In this context, National Grid notes that National Policy Statement EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Please refer to the responses above for details of the visual and landscape effects on the River Colne tributary valley lying between Fordham and West Bergholt. The Applicant acknowledges that the settings of some designated assets within Little Horkesley Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Horkesley Parish. The Project will not result in any substantial harm to designated heritage assets.
Good Design	The proposed alignment through the Fordham Valley also conflicts with Holford Rule 1 (avoid ridges and skylines) and Rule 4 (choose routes through less sensitive landscape), both of which are directly breached by the current design. NPS EN5 2.9.23 permits undergrounding even	The Applicant disagrees that the Holford Rules ¹⁰ have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions

Topic	Comment	National Grid's response
	though the route is away from the National Landscape. All pylons within this valley (which extends to TB49 on current maps) should be removed.	which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. On the wider routeing point the Applicant's position remains unchanged on this matter for the reasons set out below and expanded upon in section 4.6 of 5.15 Design Development Report [APP-122]. The Applicant carefully considered the use of overhead lines or underground cable and has concluded that an overhead line is the appropriate basis for the Project. It is acknowledged that there would be effects arising from overhead line infrastructure, but the level of such effects is not considered to meet the requirements to consider a change to underground cable set out at Paragraph 2.9.23 to 2.9.25 of NPS EN-5 (2024) in this area, which is not subject to a National Landscape designation. Even if others took a contrary view regarding the test at 2.9.23, then different undergrounding methods either give rise to a high level of impact on trees, on high organic matter soils or on the WaLOR project; present unacceptable risks to cable integrity; or are at a level of cost inconsistent with National Grid's duties and relevant planning policy (i.e. Electricity Act 1989 and NPS EN-5 (2024)).
Alternatives	Misuse of Cost arguments and Selective Assessment by National Grid National Grid repeatedly invokes cost as justification for rejecting undergrounding and relocation in settings where Pylons harm the Dedham Vale. Yet NPS-EN5 2.9.22 only refers to engineering infeasibility and greater harm. It does not allow cost to influence decisions on National Landscapes. Cost is only the consideration in policy where	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way³. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-

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	the National Landscape is unaffected, the additional cases where it might still be worthwhile being set out in 2.9.29. Only in these cases does undergrounding become a matter of the cost benefit balance. In designated National Landscapes or adjoining areas, financial grounds cannot outweigh cultural, environmental and heritage harm. National Grid also repeatedly state policy in selective terms or seek to extend it beyond actual meaning. Further examples include the (inaccurate) statement that policy requires use of Pylons outside of National Landscapes, and repeated attempts to minimise statements of harm within the Dedham Vale and to constrain consideration to artificially narrow terms.	122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.
Landscape and Visual	Moreover, the company's visual-impact evidence is selective: several viewpoints are photographed from behind hedges or oriented away from pylons. Accurate view-sheds	The Applicant notes the concerns raised by Little Horkesley Parish Council and confirms that the LVIA assessment team has thoroughly explored potential effects on views to at least 3 km from the Project, and their findings and judgements are set out, in an objective and consistent manner, at 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].

Topic	Comment	National Grid's response
	show near-total visibility of 50 m pylons across the Vale, except for the narrow river corridor. This renders the claim of "no significant effect" indefensible. Impacts must be minimised by design and fully and fairly represented.	The Applicant has not stated there would be no significant effects. As set out in the responses above, significant adverse visual effects are reported up to 1.5 km from the Project within the Visual Receptor Areas (VRAs) associated with the River Colne tributary valley lying between Fordham and West Bergholt. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed and agreed with relevant Local Planning Authorities, as set out in the relevant Statements of Common Ground (5.9.1 – 5.9.12 [APP-089 to APP-100]) and described in Table 13.1 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The LVIA viewpoints are a representative selection of publicly accessible locations along the Project route, capturing a range of receptors and a variety of distances and viewing directions. Professional guidance set out in GLVIA3 requires that representative viewpoints are selected. It does not require that every potential receptor is represented by an assessment or illustrated viewpoint, recognising that this would be impossible, and would result in a disproportionate level of information being provided, which would not be helpful to decision makers. It is important to note that the judgements presented in the LVIA, as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] are based on first hand observations and professional judgements made during site visits and not on viewpoints and visualisations alone. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in 7.12 Visualisations [APP-343 - APP-349]. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in the 7.12 Visualisations [APP-350 - APP-351]. The methodology to produce the Zones of Theoretical Visibility (ZTVs) is set out in section 13.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] and follows the current good practice guidance

Topic	Comment	National Grid's response
		produced by the Landscape Institute (Landscape Institute, 2019). The ZTV indicates theoretical visibility but this does not take into account the reduction in perception of the infrastructure with increasing distance, or given screening from other built features in the landscape, or filtering by vegetation. As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area It is important to remember that the fact that a feature is potentially visible from a location does not automatically equate to the visual effects being significant. The nature and extent of that visibility is also a consideration, as is the sensitivity of the receptor.
Consultation	Procedural Defects and Public Confidence. The consultation process offered a single predetermined route and dismissed alternative suggestions. That approach breaches the principle of fair participation embedded in Planning Act and Gunning Principles which expect real, open and iterative engagement. Public trust in national-infrastructure planning cannot be maintained when consultation is a formality rather than a dialogue.	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a NSIP. Therefore, the Project would require consent under the Planning Act 2008. The Government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP Project for developers to follow. The authors of that guidance had specific regard to the Gunning principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. The development of the Project from consideration of strategic options through to detailed siting of individual elements has been comprehensively set out in documents published in support of consultation and the DCO application, This includes Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [APP-060], 5.15 Design Development Report [APP-122] and [APP-355 to APP-360]. Alternatives in the context of the EIA Regulations have been described in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]. Additionally, chapter 2 of 5.15 Design Development Report [APP-122] sets out why we consult on a single project. We do present the alternatives and reasons for our preferences but it would be disingenuous to present alternatives by way of a choice in circumstances where the alternative fails to meet our duties.

Topic	Comment	National Grid's response
		A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N5: Legal Opinions [APP-080] .
Planning policy	Changes must be made. In order to comply with the requirements of National Policy and Law the Planning Inspectorate MUST: Reject the current proposal in the area immediately south of the Dedham Vale as incompatible with NPS-EN5, NPS-EN1, and LRA23 s.245.	The Applicant notes the respondent's feedback. Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by National Planning Policy Statements EN-1 (2024) and EN5 (2024). However, national planning policy in the form of the National Planning Policy Framework⁹ (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies.
Alternatives	Require adoption of an alternative route which avoids the Dedham Vale entirely. If such alternative route is not adopted (which would in itself be contrary to NPS EN5), then it must relocate the EACN away from Ardleigh to a low-impact brownfield site away from the Dedham Vale. Mandate full undergrounding of any pylons which impact the Dedham vale, unless infeasible in engineering terms, regardless of whether inside or outside of the boundaries of the National Landscape.	The Applicant has considered the siting of the EACN, the location of the Great Horkesley CSE compounds and the nature of the connection (overhead line or underground cable). The comments noted here have already been responded to in the responses above and so are not repeated in detail. However in summary the effects from the CSEs do not justify the additional cable and transfer of effects as tests in 2.9.23 are not engaged; the EACN is appropriately sited balancing the effects arising from the substation infrastructure, 400kV connections to it and customer connections; alternative sites for the EACN lead to transfer of effects, greater effects on the National Landscape and present a number of technical risks; a change to underground cable cannot be justified in this location, nor can the broader consideration of HVDC be supported.

Topic	Comment	National Grid's response
	Allow more underground cable and remove pylons on the way in to the Eastern Sealing End Compound Great Horkesley Relocate the Western Sealing End Compound from Little Horkesley further south to at least the alternative location identified by National Grid, with extended undergrounding. Remove or underground pylons in the Fordham Valley which extends to TB49 or beyond in careful consideration with residents to protect listed buildings and key viewpoints in a landscape of immense character equal to that of the Dedham Vale in its own right.	
Historic Environment	Avoid damage to Archeology through careful planning	The Applicant fully recognises the importance of safeguarding archaeological remains within Little Horkesley, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including geoarchaeological and palaeoenvironmental investigation A programme of archaeological evaluation has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground)

Topic	Comment	National Grid's response
		[APP-089 to APP-100 and APP-102]). All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information [AS-068 to AS-083], of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,440 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.
Landscape and Visual	Conclusion The Dedham Vale is a landscape of national	The Applicant acknowledges the points raised which are responded to in detail above.

Topic	Comment	National Grid's response
	importance—ecologically rich, culturally iconic, and legally protected. National Grid's own evidence confirms that the harm it proposes is both foreseen and avoidable. At least one alternative route has been said by National Grid to be cheaper on a lifetime basis. Employing an alternative route away from the Dedham Vale, significantly extending undergrounding along the southern border and relocating the Western Sealing End Compound would bring the project into compliance with policy. Parts of these changes can be achieved at minimal cost. The Fordham Valley must be protected. I therefore urge the Planning Inspectorate to reject or substantially amend the Norwich–Tilbury project and to uphold the principle that major infrastructure must be planned in accordance with law, evidence, and respect for England's most cherished landscapes.	

2.39 Little Waltham Parish Council

- 2.39.1 Table 2.39 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Little Waltham Parish Council **[RR-2174]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.39 Comments and National Grid's response

Topic	Comment	National Grid's response
Alternatives	Submission 1: The Parish Council strongly believes that the transmission line should be routed offshore to minimize environmental and community impact.	The Applicant considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357] , with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	Submission 2: If the offshore route is not accepted, we advocate for the transmission line to be undergrounded as it passes between Little Waltham	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with

Topic	Comment	National Grid's response
	and Great Waltham to reduce the visual and environmental impact.	change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. This has been considered by the Applicant. Paragraph 9.2.23 of 5.15 Design Development Report [APP-122] concludes that: <i>'Considering the overall balance of effects on the area between Great Waltham and Little Waltham resulting from a low height lattice pylon alignment in the context of NPS EN-5 Paragraph 2.9.23, it is concluded that this does not provide a clear case to justify the costs and effects arising from the use of underground cable. The effects arising from overhead line on heritage assets comprise less than substantial harm with the Grade II registered park and garden experiencing effects that could overall be considered to be in the middle range of less than substantial harm. With the cost of an underground solution, indicatively estimated to be in the order of £80 million to £100 million for a 2 km to 3 km section (subject to CSE compound location and need for trenchless crossings), National Grid has concluded that the use of an overhead line utilising a section of low height lattice pylons should be taken forward in the vicinity of Great and Little Waltham.'</i> The Applicant does not propose a change to this conclusion
Alternatives	Submission 3: Should the use of above-ground pylons be preferred over undergrounding, we urge that the line follow the "alternative route" proposed in the consultation. These options reflect our view that they would be the most beneficial for both the community and the environment, and we urge you to reconsider this. The Parish Council's previous submission	The Applicant considered a more westerly alignment, which is preferred by the respondent, which is routed away from Little Waltham diverting from the south of Great Leighs towards Pleshey and then southwards towards Chignal Smealey. In the Corridor and Preliminary Routeing and Siting Study published as part of the 2022 non-statutory consultation (7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]) and in the 2023 [APP-358] and, 2024 [APP-359] Design Development Reports published in subsequent consultations , and the 5.15 Design Development Report [APP-122], the Applicant set out the challenges associated with routeing either further to the west or to the east of Chelmsford parallel to the existing 400 kV overhead line. Whilst noting the respondent's preference for one of these alternatives, no new factors have been identified nor new evidence provided nor identified to remove the basis for previous decision making. Firstly, it is noted that our assessments of the Project alignment are that it is not unacceptable in policy terms and there is no specific need therefore to change, nonetheless we have reviewed other route alternatives. The eastern route around

Topic	Comment	National Grid's response
	from May 2024, provides further details supporting these positions.	Chelmsford remains less preferred and no change to the fundamental constraints to successful routeing have been identified or proposed. We have also previously reviewed a more westerly alignment which is preferred by the respondent. Whilst noting a reduction in some effects for this more western alternative, it would be a longer route by 2.5 km to 3 km with a degree of transfer of effects. Given that none of the effects arising for the Project alignment are considered to be at a level which is unacceptable in policy terms, the Applicant continues to prefer the Project alignment and for the reasons stated the eastern and western alternatives are not progressed. No change is proposed. An Environmental Impact Assessment has been undertaken and the findings are presented in the Environmental Statement [APP-123 to APP-287, AS-026 and AS-068] , which has identified any need for additional mitigation.
Historic Environment	We would like to reiterate the significance of the Ash Tree Scheduled Monument and the highlight the potential destruction it will face if the proposed pylons are permitted in their current locations.	The Applicant is aware of the significance of the high value Ash Tree Scheduled Monument and it has been assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] . The scheduled monument lies 100 m to the south-east of the Order Limits, c.200 m south-south-east of pylon TB140, and c.160 m south-east of the temporary haul road. This means that the known areas of below ground impact within the Order Limits are well outside the bounds of the monument. However, the archaeological evaluation work for the Project has continued since submission of the Development Consent Order, and the Order Limits to the north-west of the asset has been geophysically surveyed and archaeological trial trenching will be undertaken in the coming month. Should archaeological remains be encountered that potentially relate to the monument then 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the archaeological remains. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development.
Historic Environment	Little Waltham is in a conservation area, and there are many listed buildings, especially on The Street. Allowing the pylons to be	6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets within Little Waltham Parish. The Project will not result in any substantial harm to designated heritage assets.

Topic	Comment	National Grid's response
	placed in these locations would effectively destroy this important historic site and negatively impact on the rich housing heritage of the area.	Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP Infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. The Applicant has reviewed the assessment of Little Waltham Conservation Area considering the comments received from Little Waltham Parish Council. The Applicant acknowledges that the Project will introduce pylons and wires to within 150 m of the western edge of the asset impacting its setting. The Applicant acknowledges that the rural land to the west and between the asset and Great Waltham contributes to the value of the conservation area but considers that the construction of the B1008 bypass already reduced this contribution. Furthermore, the contribution this agricultural land makes to the value of the conservation area is proportionally much less significant than internal vistas along The Street and along the route of the Chelmer River towards the Church of St Martin. The Applicant is, therefore, satisfied that the conclusions reached in 6.11.A2

Topic	Comment	National Grid's response
		Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of low adverse significance of effect and in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of lower less than substantial harm are proportionate and appropriate.
Historic Environment	Conclusion The Parish Council firmly maintain that the proposed pylon route, as currently outlined, would lead to the destruction of the village environment and the Ash Tree Corner Scheduled Monument. We urge you to carefully consider our concerns and take them into account during this consultation. Thank you for your attention to these matters. We look forward to your response and hope that our comments are given due consideration. Yours sincerely, Little Waltham Parish Council	The Applicant acknowledges these concluding points made by Little Waltham Parish Council and has responded to them in detail above.

2.40 Marks Tey Parish Council

- 2.40.1 Table 2.40 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Marks Tey Parish Council [RR-2375]. **The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.**

Table 2.40 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	To the Planning Inspectorate, On behalf of Marks Tey Parish Council, I formally object to the National Grid Norwich to Tilbury overhead pylon project proposed under the Development Consent Order.	Noted.
Landscape and Visual	The installation of these overhead lines will cause significant and irreversible blight on the landscape, detracting from the natural beauty and character of the region. Such visual intrusion will impact communities, harm local environments, and reduce the quality of life for residents.	A landscape assessment which considers effects on landscape character has been carried out and the Applicant has reported that there will be significant effects on landscape character within approximately 1.5 km of the Project in this area. The effects close to Marks Tey Parish are set out in paragraphs 13.3.589 to 13.3.603 (LCA B2 Easthorpe Farmland Plateau) and 13.3.637 to 13.3.653 (LCA B4: Gosfield Wooded Farmlands) within 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] . This document forms part of the Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] , which has been undertaken as part of the Environmental Impact Assessment. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) ⁵⁸ .
Alternatives	Moreover, I strongly urge that less harmful alternatives be	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to

⁵⁸ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
	considered and prioritized. Modern solutions such as high voltage direct current (HVDC) underground cables, offshore coordination of energy transmission, and upgrading the existing grid using the most up-to-date technology offer far less environmental and visual disruption. These alternatives can meet energy needs without imposing the damaging legacy of large overhead pylons.	2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
N/A	For the sake of preserving our environment and communities, this project should not be approved in its current form.	The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands.

2.41 Mellis Parish Council

2.41.1 Table 2.41 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by (Mellis Parish Council) **[RR-2468]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.41 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Needs Case	Objection to the Scheme Mellis Parish Council strongly objects to National Grid’s current proposal for 184km of 50m overhead pylons to transport power from Norwich to Tilbury.	Noted.
Timescales	Whilst the Parish Council acknowledges the government’s net zero commitment, and is mindful of related energy security, carbon reduction and energy poverty issues, it recognises the findings of the Hiorns report, in that the need for additional transmission capacity is more likely be closer to 2034/2035 than National Grid’s programme delivery date of 2030.	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks ⁵⁹ and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report’s conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis ⁶⁰ , Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant’s obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission

⁵⁹ Andy Hiorns (2023) *East Anglia Transmission Network Reinforcements*

⁶⁰ National Energy System Operator (NESO) (2024) *Clean Power 2030 Annex 2: Networks, connections and network access analysis*

Topic	Comment	National Grid's response
		services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.
Alternatives	The Parish council believes that a pause to the scheme is essential to allow preferable alternatives such as a fully integrated off shore grid, or HVDC underground cables, to be fully considered and consulted upon. This delay would be more likely to enable delivery of the objectives of this and other projects in the region, whilst minimizing the impacts of such developments on the local communities and environment.	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the GB energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on zero delivery. The Applicant also notes constraints in the high voltage direct current (HVDC) market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service.
Historic Environment	Key Impact Issues: Visual Impact & Heritage Mellis is a historic settlement appearing several times in the Domesday	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Mellis Parish. The Applicant acknowledges that the settings of some designated assets within Mellis Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental

Topic	Comment	National Grid's response
	survey of 1086. There are 32 listed buildings in Mellis; 29 are Grade II listed, and 3 are Grade II* listed, including the 14th century Church of St Mary. The Suffolk County Sites and Monuments Record lists 14 sites of archaeological interest from various periods within Mellis. The earliest remains listed include a Bronze Age arrowhead, an Iron Age Occupation site, and some Roman pottery shards. Three medieval moated sites are still visible. Oliver Cromwell exercised his troops in Mellis during the Civil War. The name of Cavalry Barn on the Common bears testament to this. Whilst many commons were enclosed and lost, Mellis Common was not, and provides a visual example of what large parts of the country used to look like. In fact, Mellis Common has not been encroached upon or changed in shape since the Hodgkinson's 1783 map of Suffolk. The proposed pylons, RG098 to RG117 to the north and west of the parish, will completely overshadow Mellis	Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project would not result in any substantial harm to designated heritage assets. As Mellis Common is entirely contained within the Mellis Conservation Area, the Applicant has reviewed the assessment of the conservation area considering the comments by Mellis Parish Council. The Applicant acknowledges that the view south-west from within the conservation area would include pylons at a distance of over 1 km, and that pylons would be visible in the background of the Grade II Hall Farm Barn listed building. The pylons here, however, would be replacing existing PKF 132 kV overhead line of smaller pylons. The Applicant does not discount this impact but considers this particular view is proportionally a small contributor to the overall understanding and experience of the conservation area and therefore, Mellis Common. The Applicant is therefore satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of negligible adverse significance of effect and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of lower less than substantial harm, are appropriate. The Applicant has reviewed the assessment of Hall Farmhouse and associated moat considering the comments by Mellis Parish Council. The Project would be partially located within the setting of the asset during construction, but the pylons lie outside the extent of its setting. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent neutral significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and no harm (during the operation (and maintenance)

Topic	Comment	National Grid's response
	Common, and forever change this historically important unobstructed view. Three properties on the Common, Grade II listed Hall Farm, Grade II listed Potash Farm, and the Old Parsonage, are all the sites of visible medieval moats. The settings of these unique historic sites will be irrevocably, adversely affected by the above pylons. These precious heritage assets must be protected.	phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. The Applicant has reviewed the assessment of the Potash Farm House and associated moat considering the respondent's comment. The assets are located at the south-western edge of Mellis Conservation Area. However, due to overall distance, and the setting of the assets being focused on the farm complex and immediate landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. The Applicant has attempted, but without success, to identify the moat associated with the 'Old Parsonage' as referenced by Mellis Parish Council in its comments. It has not been able to identify the Old Parsonage and so it is assumed the structure is not a listed building. It should be noted that the Study Area for non-designated assets like the moat was 250 m measured from the Order Limits and so it is possible the moated site is located outside the Study Area.
Ecology and Biodiversity	Biodiversity The construction activity between RG097 – RG119 will be detrimental to the movement of various wildlife that live in this area. The powerlines will pass through natural habitats which will disrupt wildlife migration patterns, disturb ecosystems and pose risks to bird populations due to decimation of the hedgerows as well as potential collisions with the lines. Mellis is home to successful breeding grey partridges, skylarks, yellow hammers, oyster catchers,	Through routing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on protected species, including bats, barn owl, birds, hares, badger, water vole and hedgehog. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation including between RG097 and RG119. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce impacts, including potential fragmentation impacts, on valuable habitats and species. There would be no direct or indirect effects on Mellis Common County Wildlife Site (CWS). Mellis Common CWS is located 150 m (at the closest point) to third party 132 kV

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	lapwings and turtle doves. Local farmers and conservationists have worked very hard in recent years to reclaim wildlife and biodiversity and thus their numbers have increased, most notably the grey partridges which are included on the Red List for endangered species. The village is also home to bats, barn owls, kestrels, tawny owls, roe deer, muntjac deer, hares, badgers, water voles, hedgehogs and great crested newts. Mellis Common is unique being the largest unfenced area of Common land in England, and a conservation area. In summer rare plants such as green winged orchid, sulphur clover, and adder's tongue flourish. The abundance of small mammals provides the perfect hunting ground for the barn owls and tawny owls. Great crested newts, which are a European protected species live in the ponds and wet depressions on the common, which were previously a source of clay for building, due to Mellis being situated in the	undergrounding and c.600 m from the proposed 400 kV overhead line works. There would be no short or long term impacts on the CWS and its associated flora as a result of the Project. A great crested newt district level licence would be obtained from Natural England by the Project post consent, to ensure no impacts to the conservation status of great crested newts. A signed Impact Assessment and Conservation Payment Certificate (IACPA) has been obtained from Natural England. Muntjac deer, are not protected species and are classified as an invasive non-native species under the Invasive Alien Species (Enforcement and Permitting) Order 2019. As a result, projects are not permitted to implement mitigation measures that facilitate or encourage the movement or conservation of muntjac deer. Given their invasive status, no specific mitigation is required or appropriate within the proposed works area. Muntjac deer are widespread, highly adaptable, and capable of moving freely through a variety of habitats without assistance, and the proposed construction works would not create barriers that would impede their movement significantly. The Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299]. The following bird species are known to be present in the local area as mentioned: grey partridge, skylark, yellowhammer, oystercatcher, lapwing, turtle dove, barn owl, kestrel and tawny owl. These species, including farmland birds and birds of prey, are assessed within 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026] and 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [AS-030]. While some short-term disturbance may occur during construction, impacts are expected to be localised and temporary. Suitable surrounding habitat would remain available throughout construction, and all temporarily affected areas will be reinstated following works, restoring foraging and nesting opportunities. In terms of collision with overhead lines, collision risk has been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-

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	central part of the Plateau Claylands. In their Preliminary Environmental Information Report, National Grid has stated that the Plateau Claylands will be directly affected by construction activity, particularly between RG117 and RG122, which run to the south of Mellis. The UK government has made a commitment under the G7 Nature compact biodiversity and sustainability agreement to 'support and drive the protection, conservation and restoration of the ecosystems critical to halt and reverse biodiversity loss and tackle climate change, such as supporting the target to conserve or protect at least 30% of global land'. Mellis Parish Council strongly upholds these values, which National Grid seemingly does not.	167 to APP-170]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016)⁶¹ guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records has been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. In addition, the line between RG097 and RG119 replaces an existing line through farmland in this area and is not considered to result in a significant increase of baseline collision risk to the species associated with this habitat. The noted success of breeding species of conservation concern within the area suggests the baseline collision risk in the area is low. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney to the north of the Mellis Parish as detailed in 7.4 Outline Landscape and Ecological Management Plan (Revision D). The Applicant notes that the respondent makes reference to the Preliminary Environmental Information Report (PEIR), Appendix 13.1: Landscape Baseline and Assessment in relation to the Plateau Claylands. The appraisal in the PEIR is superseded by the EIA for the Project. The Applicant has undertaken a Landscape and Visual Impact Assessment (LVIA) as part of the EIA, presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on the Plateau Claylands are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Type (LCT) Plateau Claylands (paragraphs 13.3.242 to 13.3.256). Paragraph 13.3.246 explains that the Plateau Claylands LCT would be directly affected by construction activity between RG117 and RG124, west of Thornham Magna, and between RG125 and RG152, west of Mendlesham and Mendlesham Green. These pylons are to the south of Mellis. The LVIA set out in 6.13 Environmental Statement Chapter 13 -

⁶¹ NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

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		Landscape and Visual [APP-226] identifies significant adverse residual landscape effects within Plateau Claylands LCT to a distance of approximately 1.5 km from the Project. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.
Protected Paths	Public Rights of Way The need to underground the existing UK Power Network to the north west of Mellis will directly impact the parish footpaths and bridleways making them unusable to horse riders, walkers, dog walkers and Mellis Cani-Cross Group. There are no safe alternatives and residents' daily lives, routines and leisure activities will be affected, which in turn impacts on mental health and well-being. It is unknown if, how or when the PROW will be reinstated. Affected PROW: PROW No. Pylon No. 9 RG097 10 RG099 12 RG100 14 RG114 – RG115 27 RG110 35 RG106 - RG107 36 RG109 There are many horse owners in and around Mellis, with livery service GLH Equestrian situated on Mellis Road past the primary school towards	Through an iterative process of routing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRoW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329] and detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan. With specific reference to the PRoWs listed between pylons RG097 and RG115, most of these will remain open on their existing alignments, with access managed as necessary in accordance with the 7.6 Outline PRoW Management Plan [APP-329], including appropriate safety measures at locations where they interact with construction activities. However, Footpaths W-389/002/0, W-172/036/0 and W-172/027/0, and Bridleway W-172/022/0 will be subject to temporary closure with a localised diversion provided around the perimeter of working areas. Of these, W-389/002/0 and W-172/022/0 will only be diverted for a few days, while Footpaths W-172/036/0 and W-172/027/0 will require a longer duration due to the nature of the works at these locations. Further details for each affected PRoW are provided in the 7.6 Outline Public Rights of Way Management Plan [APP-329]. All PRoWs will be reinstated as soon as practicable to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with

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	Yaxley. Overhead high voltage power lines are simply incompatible with horses. Horses are prey animals and the low frequency noise and magnetic fields can cause a flight reaction from horses at grass or being stabled, and/or whilst ridden or led. Affected bridleways: PROW No. Pylon No. 14 RG114 – RG115 35 RG106 – RG107 10 RG099.	Local Highway Authorities and affected stakeholders as the detailed PROW management arrangements are developed. The pedestrian, cycling and horse-riding delay has been assessed within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The mentioned PROWs will be temporarily diverted for a short duration with an increase in journey length less than 500 m and a maximum journey time increase of 2 minutes in footpath W-172/036/0. Therefore it is not considered that there is any significant impact of delay to PROW users once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. A recreational route assessment has been undertaken within the Environmental Statement. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] concluded that no significant adverse effects are anticipated on recreational routes within Mellis Parish Council. An assessment of the impacts of the Project on physical activity as a result of changes to PROW and areas of open space during construction has been undertaken, with conclusions set out in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The chapter notes that physical activity is important for both physical and mental health and wellbeing, with recreational routes providing opportunities for relaxation, stress reduction, and mental restoration, all of which are relevant to overall wellbeing. Table 10.13 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] categorises wards along the Project route according to the scale of potential impact relating to physical activity; Gislingham ward, within which Mellis is located, is categorised as a ward where the potential impact on physical activity is likely to be low by virtue of the fact that only a small number of PROWs or areas of open space are affected. Whilst a relatively small minority of the population would be affected in each ward through which the Project route passes, alternative routes are generally available for use for the period over which effects are predicted to last. Whilst physical activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of PROWs)

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		are generally short-term, with rapid reversal / diversions in place and no significant effects on health and wellbeing have been identified. The possible effects of electric and magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in National Policy Statement (NPS) EN-5 paragraph 2.9.58 which states: <i>'There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.'</i> Although horses are not directly mentioned, there is no evidence to suggest they are any different to other farm animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project has been designed in accordance with the principles of the government's Code of Practice Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields⁶² to ensure these are mitigated, which include equestrian facilities.
Construction Impacts	Furze Way and Stonebridge Way are both byways which will be hugely and negatively impacted by pylons RG108 to 105, and the undergrounding of the existing UK Power Network. They are due to be used as service roads, for which they are completely unsuitable. Furze Way has been the subject of complaints from residents for many years, due to the poor state of repair making it hazardous for vehicles, pedestrians, horses	The Applicant notes the concern regarding Furze Way (Byway Open to All Traffic W-172/035/0) and Stonebridge Way (Byway Open to All Traffic W-172/034/0). As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], both of these byways will remain open on their existing alignments throughout construction, with access managed as necessary where they interact with construction activities. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final Public Rights of Way Management Plan. All Public Rights of Way temporarily affected by the works will be reinstated as soon as reasonably practicable, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.

⁶² Department of Energy and Climate Change (2013) *Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields*

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	and cyclists, and prone to flooding, yet it is due to be used as a service road, which is simply unacceptable	
Landscape and Visual	Dam Lane, is a beautiful green lane covering 1.6 miles across country, between Mellis Ash Road and the A143, near Wortham. It is a historical, local asset, much loved by ramblers, dog walkers and horse riders. Dam Lane which will be visually impacted by pylons RG103 to RG100, has been highlighted by National Grid as an area of constraint, however the north end is still within the red line area of physical impact, and the proposed site of a compound. Along this route there is an early mediaeval, moated site, next to Seething's Wood which was investigated in the 1930's by the archaeologist Basil Brown, who discovered the Anglo-Saxon Ship Burial at Sutton Hoo. The Parish Council believes Dam Lane needs permanent protection and should be treated as a historic relic. Pylon RG100 is	The Applicant notes the concern regarding Dam Lane. As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], Dam Lane will remain accessible throughout construction on its existing alignment, with access from pylon RG100, past RG99, and alongside RG96 managed as necessary to ensure user safety where the lane interacts with construction activities. This may include brief holding of users or directing them around a localised working area, as appropriate. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected by the works will be reinstated as soon as reasonably practicable, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant also confirms that the construction compound shown at the northern extent of Dam Lane is located to the west of the Lane and does not encroach onto the Lane itself. Dam Lane is located within Visual Receptor Area (VRA) B3 Mellis. The closest pylons are RG100 to RG103 and these lie within 0.5 km of parts of Dam Lane. As reported by the Applicant in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229], effects on visual receptors within VRA B3, including road users and recreational receptors using PRow, have been assessed as significant at construction and operation up to approximately 1.5 km from the Project. Effects within 0.5 km are reported as major. These findings are supported by the viewpoint assessment findings which identify significant and adverse visual effects on views from Mellis looking to the north-west (represented by Viewpoint 2.05: Mellis Road, Mellis Green in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]), and views from south of Thrandeston looking south-west in the direction of Dam Lane (Viewpoint 2.33: Mellis Road, south of

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	proposed to be sited directly at the north end of Dam Lane.	Thrandeston in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. With regard to the historic environment, Dam Lane is not included in any of the agreed sources listed in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS 068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. During construction Dam Lane would be crossed by the temporary haul road. Resulting impacts on the hedges bordering the lane are reduced and mitigated in the 7.4 Outline Landscape and Ecological Management Plan (Revision D).
Hydrology Land Drainage and Flood Risk	Construction and Traffic Impact National Grid's intention to underground the existing 30m tall UKPN pylons to the west of Mellis will have a devastating impact to PROW, nearby listed buildings, (there are three Grade II listed buildings in close proximity to the north on Mellis Road, as well as Grade II* listed Burgate Church), farmland, and flood control. The Parish Council is deeply concerned that this work will impact the natural drainage of the farmland through which the undergrounding will pass. Mellis and the surrounding parishes have seen a significant increase in localised flooding in recent years. There is a natural land drain to the	The Applicant has provided detail earlier in this response in relation to how Public Rights of Way (PROWs) within Mellis Parish are affected and appropriate mitigation / management measures the Applicant will take to ensure they remain accessible and usable, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329]. A recreational route assessment has been undertaken within the Environmental Statement. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] concluded that no significant adverse effects are anticipated on recreational routes within Mellis Parish Council. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Mellis Parish. The impacts of the Project on Mellis's historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072, AS-074, AS-076]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In

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	west of Mellis Common which is at risk of disruption from the proposed works. During winter 2023/24 Mellis Ash Road was severely flooded on numerous occasions, and the Parish Council is concerned that this will significantly worsen as a result of the undergrounding. If the drainage ditches and ponds on Mellis Common are affected, the village is at an even higher risk of flooding.	addition to the proposals in the 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project would not result in any substantial harm to designated heritage assets. With regard to the impact of flooding on the historic environment, the Applicant defers to the findings of the 7.9 Flood Risk Assessment [APP-331]. It is acknowledged in 7.9 Flood Risk Assessment [APP-331] that some of the works to UK Power Networks pylons (referred to as 'third party infrastructure works') would be within areas at risk of flooding. 7.9 Flood Risk Assessment [APP-331] has incorporated information on local flood history, including information from Mellis Parish residents. 7.9 Flood Risk Assessment [APP-331] refers to the suite of measures that would be in place to manage risks during construction of the Project which includes these third party infrastructure works referred to by Mellis Parish Council. These measures have been agreed with the Environment Agency and include for example managing construction works sites in accordance with the Flood Warning and Evacuation Plan (7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]). The mitigation measures that will be in place are detailed in 7.2 Outline Code of Construction Practice (Revision C). No works are proposed at Mellis Common. Regarding the land drain to the west of Mellis Common, 7.9 Flood Risk Assessment [APP-331] addresses the potential for construction works to impact surface water flooding through changes to the existing land drainage regime. 8.2 Drainage Strategy DCO [REP1-072], submitted at Deadline 1, provides additional information as to how negative effects on the land drainage regime would be managed and controlled. As per commitment W14 of 7.2 Outline Code of Construction Practice (Revision C), replacement drainage schemes would be installed where appropriate once the Project has been constructed.

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		7.9 Flood Risk Assessment [APP-331] concludes that, with the mitigation measures in place, there would not be an increase in flood risk elsewhere as a consequence of the Project.
Traffic and Transport	The increase in traffic and HGVs during construction of the pylons, access roads, compounds and all associated works will have a significant impact on Mellis. The Parish Council has been campaigning for many years to reduce the existing high volume of traffic and HGVs travelling through Mellis from the A143 to the A140. Mellis Primary School is situated on this route, and there are already public and road safety concerns at school drop off/collections times. Whilst Mellis Road has not been specified in Appendix 16.3 of National Grid's Preliminary Environmental Information Report, the expected increase in HGV on nearby roads is unbelievably high: A143 – 20% increase Thornham Road – 371% increase Eastlands Land – 6308% increase Lion Road – 215% increase B1113 – 93% increase There is a precedent from recent local	The construction routeing strategy is detailed within Section 5.4 of the 7.3 Outline Construction Traffic Management Plan (Revision B). This has been developed to manage the impact of construction vehicles on the public highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network (SRN) and Major Road Network (MRN), and temporary haul roads for access along the alignment. Construction traffic will use the SRN and MRN to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes (PARs) to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. There is no proposed PAR through Mellis. All delivery contractors and construction staff will be instructed to use the agreed construction access routes, complying with the agreed final Construction Traffic Management Plan for each work area. A number of measures will be implemented to ensure compliance with routeing, as set out in paragraph 6.2.8 of the 7.3 Outline Construction Traffic Management Plan (Revision B). Construction HGVs not adhering to the prescribed routes is defined as a matter of non-compliance and will be investigated following Section 6.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing a crossover bellmouth on Mellis Road, to allow construction vehicles to continue to travel on the internal haul road. Short-term, temporary closures of Mellis Road are proposed during construction of the crossover bellmouth and netting activities associated with overhead line stringing. No diversion route is currently proposed; the Applicant will provide suitable traffic management measures to maintain access for residents and landowners. This is subject to detailed design, agreement of traffic management with the Local Highway Authority and subject to further detailed design Road Safety Audit. The Applicant is also proposing short term, temporary road closure for the safe construction of the crossover bellmouth on Ash Road and netting activities associated with overhead line stringing (between points SM B-009 and SM-B-010). The proposed diversion route is via SMD-B-009, SMD-B-006, SMD B-005, SMD-B-007, SMD-B-008,

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	developments for HGVs to use Mellis Road to cut from the A140 to the A143, despite being prohibited from doing so. The Parish Council has concerns that this is certain to happen again during construction of the scheme. It is also inevitable that Mellis will see an increase from local and through traffic, using alternative roads to avoid those officially being used for construction traffic. The existing road network in and around Mellis is made up of mainly single, narrow roads, many of which are already in a state of disrepair, and will be unable to cope with any increase in traffic.	SMD B-012, SMD-B-020, SMD-B-019 and SMD-B-018 as shown on Plans A and B of 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034]. The Applicant is proposing a temporary speed restriction to 40 mph (between points TR-B-018 and TB-B-019, Sheet 6 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034]). As noted above, there is no proposed PAR through Mellis. A summary of the closest Primary Access Routes near to Mellis are provided below. 7.11 Transport Assessment [APP-333] indicates the following: • A143 Old Bury Road (Link PAR 10) has a proposed increase of 80 LGVs and 27 HGVs in the AM and PM peak hours (a 16% increase of total traffic) during the worst-case construction period of one week • Lion Road (Link PAR 11) has a proposed increase of 17 HGVs in the AM and PM peak hours (a 5% increase in total vehicles) during the worst-case construction period with a duration of four weeks • B1113 (Link PAR 12) has a proposed increase of 26 HGVs in the AM and PM peak hours (a 9% increase in total vehicles) during the worst-case construction period with a duration of two weeks • Eastlands Lane (Link PAR 14) has a proposed increase of 13 HGVs in the AM and PM peak hours (a 297% increase in total traffic with a duration of two weeks. Base traffic is 17 vehicles in the peak, which results in the high percentage, for a low level of vehicles) • Thornham Road (Link PAR 15) has an increase of 8 HGVs in the AM and PM peak hours (a 7% percentage increase of total traffic) during 22 weeks. Images E.10 to E15 in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338] provide an indicative graph of construction peak movements for these PARs. Outside the worst-case construction period the Project construction flows will be lower and therefore the Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower.

Topic	Comment	National Grid's response
		The Applicant is proposing to undertake pre- and post-construction condition surveys on routes which are expected HGV routes, in line with the 7.2 Code of Construction Practice [REP2-014] measure GG15.
Noise and Vibration	Mellis Parish Council also objects to the amount of noise from construction work between pylon RG097 – RG119 should the project go ahead. This construction activity will subject the usually quiet conservation village to varying amounts of noise each day from 24 decibels up to 110 decibels. In addition, the proposed working hours are unacceptably long and include weekends and Bank Holidays. As the nights draw in, flood lights will be needed to light the construction which will visually impact our dark night skies with light pollution.	An Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the Development Consent Order application, including 7.2 Outline Code of Construction Practice [REP2-014], 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan [REP-2-018] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Noise and vibration impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment has not identified any potential significant adverse from construction noise or vibration in Mellis.
Socioeconomics Recreation and Tourism	Local Businesses and Properties There are many local businesses in Mellis which will be negatively impacted by the proposed scheme. Many of these are tourist led such as holiday lets, and rely on visitors who are attracted by the uniqueness of the local environment; Mellis Common, the history and	Through the routeing and siting exercise the Applicant has sought to reduce as far as practicable impacts on businesses, recreation and tourism assets. Reduction in these impacts would be considered during the detailed design process. Effects on local businesses, recreation and tourism assets are presented within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. No significant adverse effects have been identified for local businesses, recreation or tourism assets located within Mellis Parish Council. In addition, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329] provide good practice and

Topic	Comment	National Grid's response
	heritage, and the beauty of the local landscape and unobstructed views.	standard control measures to reduce and mitigate potential impacts and / or disruptions that may arise during the construction phase. The Project is anticipated to generate direct, indirect and induced employment during construction. The Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual project and separate to any commitments under the proposed Development Consent Order (DCO) for this Project. Post-construction job opportunities are limited given the nature of the Project; however, the Applicant will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure the Applicant leaves a lasting positive legacy in the communities where they operate. With regard to a delivery mechanism, the above measures will be delivered as part of a community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance⁶³. Beyond the individual project level, the Project is part of The Great Grid Upgrade (TGGU), the largest overhaul of the electricity grid in generations and one of the UK's biggest engines of economic growth. In addition to supply chain growth, investment in skills and creation of high-quality jobs, TGGU will connect more secure, cleaner, home-grown energy that will stimulate national and regional growth and underpin the UK's competitiveness in a rapidly electrifying global economy. Overall, investment in Great Britain's electricity networks is set to contribute £18.4 billion to GDP annually from 2024–2035.
Property Value	The proximity of the pylons will also negatively impact property prices. The Parish Council is aware that knowledge of National Grid's proposals is already affecting	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development.

⁶³ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
	interest in the village and property values.	UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
Key Legislation and Planning Policy	Breaches of Holford Rules the Parish Council believes there are several breaches in the guidelines on overhead line routing, first formulated in 1959 by Sir William later Lord Holford, who was a part-time member of the CEGB. They are known as the 'Holford Rules.' National Grid continues to employ them as a basis of the company's approach to overhead line routing. Rule 2: Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e., the more massive structures which are used when lines change direction. Where possible choose routes which minimise the effects on the setting of areas of architectural, historic, and archaeological interest including Conservation Areas, Listed Buildings; Mellis is in a	The Applicant disagrees that the Holford Rules have not been considered or are breached. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.

Topic	Comment	National Grid's response
	Conservation and Special Landscape Area. Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees;- The route will site 50-metre-high pylons against the large sky background of the unique and historic Mellis Common. Rule 5: Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees: - The ruling states Where possible avoiding cutting extensive swathes through woodland blocks and consider opportunities for skirting edges of copses and woods. Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape; the	

Topic	Comment	National Grid's response
	pylon route cuts through a beautiful, wooded area at the bottom of Furze Way, which is situated north of Mellis. The undergrounding of the existing UK Power Network, to accommodate the pylons, cuts through the length of a wooded area north of historic Dam Lane.	
Pre-application stage consultation	CONSULTATION Mellis Parish Council does not consider it has been consulted in a way that is open, fair or transparent. Mellis Parish Council has identified the following deficiencies in National Grid's consultation process: Consultation meetings have all been timed for during the working day, denying working people the chance to have their say. There has only been one meeting in Gislingham, timed 1pm-6pm. The meetings were felt by members of the public not real consultation more paying lip service to a process. The Public Consultation/Information Events have been held in locations inaccessible by	The Applicant does not agree that consultation has been undertaken in a way that is not open, fair or transparent. Consultation has been carried out in accordance with the Planning Act 2008, relevant statutory guidance and the Applicant's Statement of Community Consultation (SoCC). As far as practicable, consultation events were held with at least two weeks' notice following the opening of each consultation stage. The Applicant sought to hold events at a range of times on different days, including weekends while recognising venue availability does vary. In doing so, the Applicant balanced accessibility, venue availability and welfare considerations. Consultation events were signposted through a range of channels, including community newsletters, the Project website, letters to stakeholder groups and media engagement, in order to maximise awareness and participation. Community newsletters were issued to every property within 1 km of the red line boundary, amounting to approximately 81,000 addresses. This approach was set out in the SoCC and was considered proportionate. In addition, the Applicant wrote to all parishes along the route, as well as neighbouring parishes, and used a range of additional engagement methods, including social and traditional advertising, to reach a wider audience. However, the Applicant recognises that not everyone is able to attend events in person and therefore also provided webinars, which were recorded and made available afterwards. In addition to in-person events and webinars, the Applicant provided a dedicated Project website, a freephone hotline, an email address and a freepost address, allowing individuals to engage with the project and speak directly with members of the Project team.

Topic	Comment	National Grid's response
	public transport. Mellis Parish Council and its residents were not consulted when the proposals were at a formative stage. The route was predetermined. The decision for pylons was also predetermined. This is against the Gunning Principles. Information on the proposals has been inaccessible to many people. The maps sent to householders are small scale area maps, generic and lacking in detail. Information has only been sent to householders within 1km of the pylon line when the visual impacts of the project are far wider. The interactive online map does not show all properties, only listed buildings. Internet access is required to fully access the proposals and their supporting information. The supporting documents on National Grid's website are not labelled or indexed in a way that makes them straightforward to access. Information is being deliberately obscured. National Grid has failed in making residents aware of the	The Project comprises a proposed overhead line connection over 2 km in length and is therefore a Nationally Significant Infrastructure Project (NSIP), requiring consent under the Planning Act 2008. The Applicant has developed its proposals and undertaken consultation in line with statutory guidance issued by government and the Planning Inspectorate, which has been prepared with specific regard to the Gunning Principles as they apply to NSIPs. The Applicant considers that consultation has been carried out in accordance with the relevant Gunning Principles. The Planning Inspectorate accepted the application for Examination having regard to the adequacy of pre-application consultation. A detailed explanation of how the Gunning Principles have been applied is provided in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007]. The maps within the community newsletter were designed to provide a clear overview of the Project. As set out in the SoCC, more detailed information and mapping were available on request via the community relations team. Individuals were also able to request hard-copy information and maps if required. While information was made available online, the Applicant recognises that not all individuals have access to digital platforms. For this reason, alternative non-digital routes were provided, including hard-copy materials on request and direct contact with the Project team. Supporting documents were made available on the Project website in accordance with statutory requirements for NSIP applications. The Applicant notes the concern raised and will continue to consider how information can be presented as clearly and accessibly as possible; however, non-technical documentation was clearly labelled and available both online and in hard copies. The Applicant provided information on construction activity at a level appropriate to the stage of Project development. The Applicant provided trained staff at the public information events to explain the proposals and answer questions. Where detailed technical information was not immediately available, queries were logged and addressed through follow-up via the Project's contact channels. The Applicant recognises the concerns of those who may be adversely affected by the proposals and has engaged landowners throughout the development process.

Topic	Comment	National Grid's response
	increased traffic requirements to build the infrastructure. National Grid has failed to make the information available and user friendly for the residents. Staff at the consultation/information events have not had the necessary knowledge to respond to queries. Parishioners report that staff have avoided responding to pertinent questions.	All feedback received during consultation has been logged and reviewed. 5.1 Consultation Report [APP-066] explains how consultation responses have informed the development of the proposals and how issues raised have been considered.
Property Value	There has been no personal engagement with homeowners who are adversely affected. Homeowners do not feel the issues they have raised in feedback to previous consultations have been addressed. Homeowners seek personal engagement given the life changing impact of these proposals. The impact of the proposals on property prices has not been assessed.	As reported in 5.1 Consultation Report [APP-066] the Applicant has held three consultations for the Project: two non-statutory in 2022 and 2023 and a statutory consultation in 2024. At all of these, we have engaged directly with affected landowners, stakeholders, and local residents with an interest in the Project. We also held targeted consultations in key areas along the route where our proposals changed following the statutory consultation. In this we engaged directly with those most affected by the changes in alignment or access and took their feedback into account The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria. Where a person's land is not acquired and no land rights are taken, but they consider that their property may be adversely affected by the construction or operation of the Project, they may fall within what is commonly referred to as a Category 3 (Cat 3) claim interest.

Topic	Comment	National Grid's response
		A relevant claim may arise where physical factors attributable to the Project such as noise, vibration, lighting or other measurable effects can be demonstrated to have caused a compensable loss. Claims based solely on generalised blight, perceived loss of value, or concern about proximity to the Project are not compensable under the statutory framework. The Applicant cannot confirm in advance whether a person will be entitled to make a Category 3 claim, nor whether any claim would result in compensation. All claims are assessed on a case-by-case basis, having regard to the specific circumstances and the statutory tests that apply.
Health and Wellbeing	National Grid has made no attempt to assess the impact of the proposals on health and mental health/wellbeing. This is an important omission in the process.	Findings from the Applicant's assessment of the Project on physical and mental health and wellbeing are set out in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] . This covers assessment of potential impacts during both construction and operation (and maintenance) phases of the Project and follows good practice guidance. No significant impacts relating to health and wellbeing have been identified.
Pre-application stage consultation	National Grid has failed to give residents any faith in the process – most have been left with the impression that their views will be ignored, and that the outcome is a foregone conclusion.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122].

Topic	Comment	National Grid's response
Pre-application stage consultation	During the targeted consultations January – March 2025, National Grid's decision to renege on their Waveney Valley alternatives proposal was not consulted upon. No reason was given for this omission, and it is inconceivable that the proposal was offered as an alternative and then withdrawn without and form of consultation.	The Applicant has not reneged on this matter and was always clear that it was carefully considering whether overhead line or underground cable was appropriate for the Waveney Valley with the decision based on evidence. The Applicant's reasons are set out below and expanded upon in Section 4.6 of 5.15 Design Development Report [APP-122] . The Applicant carefully considered the use of overhead lines or underground cable and has concluded that an overhead line is the appropriate basis for the Project. It is acknowledged that there would be effects arising from overhead line infrastructure, but the level of such effects is not considered to meet the requirements to consider a change to underground cable set out at paragraphs 2.9.23 to 2.9.25 of NPS EN-5 (2024) in this area, which is not subject to a National Landscape designation. Even if others took a contrary view regarding the test at paragraph 2.9.23, then different undergrounding methods either give rise to a high level of impact on trees, on high organic matter soils or on the Waveney and Little Ouse Recovery (WaLOR) project; present unacceptable risks to cable integrity; or are at a level of cost inconsistent with National Grid's duties and relevant planning policy (i.e. Electricity Act 1989 and NPS EN-5 (2024)).

2.42 Mendlesham Parish Council

2.42.1 Table 2.42 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Mendlesham Parish Council [RR-2470]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.42 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	The Parish of Mendlesham consists of three population areas. Mendlesham itself, Mendlesham Green and Tan Office. At the census of 2021 it was recorded that the Parish has a population of 1551. The Parish is in a rural setting and has a mixture of new housing developments, traditional housing including a number of Listed buildings and a conservation area in the centre of Mendlesham village. The Parish is surrounded by good quality agricultural land that largely produces crops. The Norwich to Tilbury project proposes to erect thirteen 50m pylons in our area.	Noted.
Needs case	The Parish Council has held a dedicated meeting for this project and it was evident that the Parishioners were unanimously against the project	Noted.

Topic	Comment	National Grid's response
	proposal, however it was generally accepted that the current Climate Emergency warrants a change from oil and gas as energy providers to greener alternatives through the electricity infrastructure.	
Biodiversity, ecology and nature conservation	Concerns of the Parish include: • Significant loss of habitats for flora and fauna. There are a number of protected species within the Parish and local area.	The vegetation clearance assumptions are set out in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and presented on 2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 – APP-055]. Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on habitats, flora and fauna within Mendlesham. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as appropriate. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. The delivery of 10% BNG would require delivery of off-site Biodiversity Units via habitat creation or enhancement actions in strategic areas, and we will consider all off-site

Topic	Comment	National Grid's response
		options that are available to us. Further detail on BNG is available in 7.1 Biodiversity Net Gain Report [APP-299].
Land use	Irreversible damage caused to precious agricultural land for development of haul roads and installation of the pylons.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Mendlesham Parish (Grade 2 and Grade 3a land). During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. Soil management measures to be implemented during construction across the Project, including across Mendlesham Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its ALC grade, or as agreed with the landowner.
Biodiversity, ecology and nature conservation	Irreversible damage caused to well established trees and hedges that would be 'removed' and destroyed.	Commitments in 7.2 Outline Code of Construction Practice (Revision C) seek to reduce impacts to trees and hedgerows during the detailed design stage, for example, tree canopy lifting to create visibility splays combined with reduced speed limits may be sufficient in order to retain roadside trees.

Topic	Comment	National Grid's response
Biodiversity, ecology and nature conservation	Project indicates a -6% biodiversity net gain for area habitat units. We expect the mandatory +10% biodiversity net gain through offsite measures. From a local perspective this biodiversity net loss will be significantly greater than stated for the whole project due to being a rural area.	The 7.1 Biodiversity Net Gain Report [APP-299] sets out the Project's approach to Biodiversity Net Gain (BNG). The Project has committed to the delivery of 10% BNG with environmental and societal benefits. While every effort has been made to deliver the committed to 10% BNG through replacement planting and on-site habitat creation/enhancement, given the scale and nature of the Project, 10% BNG is not fully achievable for area habitats within the Order Limits. The BNG deficit for area habitats will be delivered through off-site habitat creation and enhancement at third party habitat banks, to ensure that an overall 10% BNG with wider environmental and societal benefits would be achieved. Biodiversity is not bound by local authority area and therefore off-site BNG will be considered across the length of the Project. However, as detailed within 7.1 Biodiversity Net Gain Report [APP-299], the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.
Landscape and Visual	Loss of natural landscape and views of the countryside.	The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] assesses and reports on the likely effects of the Project on landscape character and on views. Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors within Mendlesham Parish Council are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under LCT Plateau Claylands in paragraphs 13.3.242 to 13.3.256, with moderate significant adverse effects reported within 1.5 km of the Project. Mendlesham is located within Visual Receptor Area (VRA) B5 Wickham Skeith and Mendlesham. The Applicant has reported in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229], that effects on visual receptors within VRA B5 have been assessed as significant at construction and operation up to approximately 1.5 km from the Project. These findings are supported by the viewpoint assessment findings which identify significant and adverse visual effects. This includes views close to Mendlesham Parish looking to the west (represented by Viewpoint 2.10: Whiteup's Lane, north of Mendlesham Green within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1

Topic	Comment	National Grid's response
		of 4 [APP-229], and Viewpoint 2.24: PRoW near Mendlesham Hall, west of Mendlesham within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. As reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of National Policy Statement (NPS) EN-1 (2024) acknowledges that '<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>' and paragraph 5.10.13, that '<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. For critical national priority infrastructure, '<i>the need case will outweigh the residual effects in all but the most exceptional cases</i>' (paragraph 4.1.7 of NPS EN-1 (2024)).
Good design	Existing pylons, that run parallel to the proposed new pylons, have recently been upgraded – why? Can these not be upgraded further to accommodate the new proposed lines?	The existing high voltage network in this area and throughout East Anglia has been or is in the process of being upgraded to maximise the capacity that it can carry. However, this will not meet the urgent identified need of the Project which is for critical national priority infrastructure in East Anglia identified in National Policy Statement EN-1 (2024)
Alternatives	Comparison costs of the 3 alternatives (overground, underground or under the sea) have not been made, therefore not evident that this is the cheapest option. Note the National Grid's High Voltage Direct Current Electricity Technical Information figures should that HVDC undergrounding cost is equal or cheaper than the pylon option.	The multi-factor evaluation of all alternative options confirms the same conclusion. 7.19 2023 — Strategic Options Backcheck and Review [APP-357] Section 5: Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore alternating current (AC) solution, in line with National Policy Statement (NPS) EN-1 (2024) and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355] (Chapter 5: Strategic Option Overview summarises the options), 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] (entire chapter) and

Topic	Comment	National Grid's response
		5.15 Design Development Report [APP-122] (Section 2: Project-Wide Consideration Relevant to Design Development and local issues addressed in Sections 4 to 11 for Sections A to H siting and routing alternatives). More localised design variants have also been considered. The Applicant considered the following options, as well as AC overhead lines: i) An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal ii) AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20–30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed iii) High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection. Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357], presents the costs, based on a transparent economic appraisal. The costs were set out at the hearing with all data coming from 7.19 2023 - Strategic Options Backcheck and Review [APP-357], Sections 7-14, tables of each section and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D: Economic Appraisal.

Image 2.1 Alternative methods of electricity transmission – cost overview

Data +B21:N39from 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Cost base in 2020/21 prices				
On-shore		EAN4 (AENC) OHL	EAS2 (ATNC) OHL	TOTAL
	Wholly Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC)	£355.20m	£539.30m	£894.50m
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93			
		EAN4 (AENC) OHL	EAS2 (ATNC) OHL + Cable	TOTAL
	Majority Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) [with 20km Cable]	£355.20m	£1,275.10m	£1,630.30m
	Derived by 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix D "Economic Appraisal"			
Off-shore		EAN4 (AENC) HVDC	EAS2 (ATNC) HVDC	TOTAL
	Wholly 4 Ended HVDC Option Project Total EAN4 (AENC) + EAS2 (ATNC)	£2,381.50m	£3,473.00m	£5,854.50m
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93			
		Offshore 1		TOTAL
	Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury	£4,096.50m		£4,096.50m
	Data from Table 14.2 page 110			
		Offshore 1	Bramford HVDC Turn-in Cost	TOTAL
	Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury	£4,096.50m	£1,265.10m	£5,361.60m
	Data from paragraph 14.4.6 page 111			
* Transmission System Comparable Options - Delivering System Benefits of Connecting to Bramford				

The table sets out all of the figures shown in the presentation slide and the location of the data from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. All costs are in 2020/21 cost base. The Wholly Overhead Line cost £894.5 million (the pre-consultation cost considering the whole option provided by overhead line). The Majority Overhead Line option included the consultation sections of underground cable which mitigate the impact on the Nationally Designated Landscape as required by NPS EN-5 (2024). These sections of cable, which form part of the EAS2 (ATNC) Bramford to Tilbury section, total circa 20 km and are the nearest proxy for the Project at £1,630.3 million.

Paragraph 14.4.6 referenced in the table above, states:

'14.4.6 Should this circuit at full 6000 MW capacity made multiterminal to provide the same system flexibility as the AC circuit options. There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'

Topic	Comment	National Grid's response
		The cost of a wholly overhead line, without any regard to any landscapes or any other environment constraints is presented as part of the initial appraisal. There is also a second cost, which includes the post-consultation view of the requirements to mitigate the landscape impacts, i.e. the cost with the underground cable of £1.6 billion. In comparison, the cost of a wholly four-ended HVDC option is £5.8 billion. The Offshore 1 – suboptimal two-ended HVDC option between Norwich and Tilbury would cost £4 billion. The reason it is suboptimal is because it does not have the connection with Bramford Substation and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection. To achieve the proposed same electrical capabilities, there is an option to have a three-ended link in Bramford Substation, so there would be three converters at Norwich, three converters at Tilbury, and three converters at Bramford Substation on a three-ended HVDC Voltage Source Converter (VSC) link. This would bring it to a similar technical capability as the proposed connection but would raise the price to £5.3 billion. It would also have no ability to connect the generation customers. The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service.
Needs Case	Only 20% of the electricity generated by this proposal will	The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to

Topic	Comment	National Grid's response
	be used in East Anglia, the rest being consumed by the Midlands and London, so why is the proposed route not further in land?	transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands.
Land and Property	No comprehensive plan in respect of financial compensation for farmers, local businesses, home owners (of which 2 houses will be only a few yards away from a proposed pylon installation) and renters. This is contrary to the Human Rights Act 2014 – protection of property (Compensation).	The Applicant has confirmed in 5.1 Consultation Report [APP-066] (Ref 9-2.950) where more information can be obtained on landowner compensation. Information on how landowners are compensated can be found in the Applicant's land rights strategy ⁶⁴ (LRS), and a copy can be found on the Project website. A copy of the document has also been sent to affected landowners on several occasions, along with an invitation to discuss it with the Project's lands team. The LRS document, and the compensation payments within, were reviewed and updated in 2024. If a landowner would like to discuss compensation matters and how the payments in the LRS would apply to them, they can contact the Project's lands team.
Health and Wellbeing	Health issues in respect of the effects of electromagnetic radiation, including effects of this on wildlife.	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. Assessment of compliance with electric and magnetic field (EMF) guidelines and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMFs can cause health effects and there are no established effects below the exposure limits. When designing our overhead lines, substations and underground cables design criteria, we ensure they would not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the government have adopted, are applied to the design which ensure the EMFs reduce as quickly with distance as possible. Evidence of that compliance is presented in 7.8 Electric and Magnetic Field Compliance Report [APP-330] submitted as part of the Development Consent Order application. The Applicant takes this issue very seriously and looks to authoritative and independent scientific organisations such as the World Health Organization and in the UK Health Security Agency to review the worldwide body of scientific evidence on health. Important decisions

⁶⁴ National Grid (n.d.) *Land Rights Strategy and Payment Schedule for Assets*

Topic	Comment	National Grid's response
		on health are taken independently of industry, and the Applicant has followed the guidance and policies adopted by government on advice from their scientific experts. Each of these organisations have comprehensive reviews of EMF research available to view on their websites. The National Policy Statement EN-5 (2024) (paragraph 2.9.58) states, '<i>There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences</i>'.
Noise and Vibration	Noise pollution for those living and travelling near the pylons.	Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the Environmental Statement (Volume 6 of the Development Consent Order application), in accordance with 6.20 Scoping Opinion [APP-297], on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261], which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions.
Air quality and emissions	Significant increase in CO2 emissions as a result of the large number of lorries or other	The impact of the Project on greenhouse gas (GHG) emissions has been considered during both construction and operational phases. The impact on changes in CO2e emissions is presented in 6.4.A1 Environmental Statement Appendix 4.1 -

Topic	Comment	National Grid's response
	heavy goods vehicles and smaller vehicles for workers	Greenhouse Gas Assessment [APP-131]. In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The GHG Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project. The construction and operational CO2e emissions were not considered to have a material impact on the ability of the government to meet its carbon reduction targets and therefore are not significant. In addition, the Project would make an important contribution to reducing GHG gas emissions by supporting the distribution of greener energy.

2.43 Mountnessing Village Council

- 2.43.1 Table 2.43 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Mountnessing Village Council **[RR-2559]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.43 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	I write on behalf of Mountnessing Village Councillors and residents alike, regarding the above mentioned pylon scheme and in response to the latest statutory consultation. Whilst accepting the need to move power from the North Sea to London, Mountnessing Village Council strongly objects to the National Grid Norwich to Tilbury pylons proposal.	Noted.
Consultation	This is based on the arguments set out in consultation responses in 2022 and 2023 by Mountnessing Village Council. Consultation has been and remains inadequate; valid alternatives have not been presented and the harm of National Grid's preferred solution significantly outweighs the benefits.	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .

Topic	Comment	National Grid's response
Alternatives	Alternatives that we would support are a fully integrated offshore grid or underground or subsea cables from Norwich to Tilbury.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and Visual	The pylons and infrastructure proposed for our area will change the rural views and infrastructure of the village for future generations to come.	The Applicant notes the concerns relating to changes in views for future generations within Mountnessing Parish and the surrounding area. A Landscape and Visual Impact Assessment (LVIA) has been carried out to assess the likely effects on visual receptors during construction and operation, and has given consideration to likely views at Year 15 of operation in the viewpoint assessment. This assessment is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and identifies significant adverse residual effects on visual receptors up to a distance of approximately 1.5 km within Visual Receptor Area (VRA) G1 Ingatestone and Fryerning (paragraphs 13.10.1 to 13.10.12) and VRA G2 Billericay West (paragraphs 13.10.13 to 13.10.24), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. A landscape assessment has been carried out within the Mountnessing Parish, and significant adverse residual effects on landscape receptors have been reported up to a distance of approximately 1.5 km within Landscape Character Area (LCA) D2 Brentwood Hills (paragraphs 13.3.736 to 13.3.756) as set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. In this context, the Applicant notes that National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.
Socio-economics, Recreation and Tourism	Hugely impacting homeowners in the area, arable farmers, historical buildings, woodland walks, and public rights of way.	Homeowners Impacts on homeowners in the area have been assessed in terms of impacts relating to noise, air quality, traffic and transport, landscape and visual, and health and wellbeing. These assessments are set out in 6.7 Environmental Statement Chapter 7 - Air

Topic	Comment	National Grid's response
		Quality [APP-147], 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Assessments have been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and following guidance as appropriate. Potential effects are comprehensively assessed within the relevant chapter of the Environmental Statement to maintain clarity and avoid duplication of assessment. No significant effects on homeowners in terms of health and wellbeing have been identified as a result of the construction or operation phases of the Project. It should be noted that the assessment of impacts on property values is not a material planning consideration within the Development Consent Order process. Arable farmers Potential impacts on farming and farm businesses are considered in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This considered that, with the implementation of good practice measures to ensure that disruption is minimised, combined with reinstatement and compensation agreements, the effects on agricultural landholdings would result in a neutral effect and would be not significant. Assessments have been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and following guidance as appropriate. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Mountnessing Parish (predominantly Grade 3a and Grade 3b, with more limited extents of Grade 2 land). The Applicant has sought to minimise impacts on BMV agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As critical national priority infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. Historic buildings

Topic	Comment	National Grid's response
		Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Mountnessing Parish. The impacts of the Project on Mountnessing's historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in the 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Mountnessing Parish. The Project will not result in any substantial harm to designated heritage assets. Woodland walks and public rights of way The Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place and no severance of the overall network is anticipated. Where PRoWs are affected, any necessary diversions and associated time

Topic	Comment	National Grid's response
		periods have been kept as short as possible, with many diversions expected to be required for only a few days or weeks within the wider construction programme. A recreational route assessment has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant adverse effects have been identified for recreational routes within Mountnessing Village Council.
Historic Environment	The path of the proposed pylons through our village will impact our historic church of St Giles which has stood in the village for 100s of years. The proposed “temporary” roads and access to the pylon sites will involve heavy goods vehicles using neighbouring roads to St Giles, which will cause un-tolled damage to the area surrounding the church and neighbouring farm. The route also impacts several houses, all historical value to our village and the rural area. The road route will significantly damage existing road infrastructure, well established and ancient hedgerows, and woodland areas alike.	7.2 Outline Code of Construction Practice (Revision C) (Outline CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in Outline CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by commitment GG33, with ecological constraints covered by commitment B02. The Applicant has set out the proposed construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic and Major Road Networks to access the region and then will be routed along Primary Access Routes (PARs) to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. The route referred to, which passes St Giles Church, Church Road / Old Church Road / Old Church Lane, is one potential access route for a mobile crane, the other being from Billericay. The selection of which route shall be used is dependent upon the Contractor's final vehicle selection and what mitigations are required when crossing bridges. As noted in Table 5.2 of 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310], it is anticipated to have total proposed crane movements of two arrivals and two departures. Other than the Abnormal Indivisible Load (AIL) movements, no other construction traffic is proposed along this route. As set out in Sheet 1 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section G [APP-319], Church Road at the junction with B1002 Roman Road has been identified to be of narrow width for design movements. The suggested highway mitigation for this is the temporary removal of street furniture and island to accommodate the mobile crane movements. Appropriate traffic

Topic	Comment	National Grid's response
Land Use	Acres of rich, productive farmland are to be decimated and untouchable for years whilst the proposed pylons are built and sited. Miles of temporary roads, using thousands of tonnes of gravel will disrupt the natural habitation and crop production for years to come.	management is to be provided in agreement with the Local Highway Authority. A rolling roadblock managed by the Police is also an option depending on availability.
		The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Mountnessing Parish (predominantly Grade 3a and Grade 3b, with more limited extents of Grade 2 land). Measures to protect land, soils and drainage systems are addressed in 7.2 Outline Code of Construction Practice (Revision C) Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require preconstruction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in 7.2 Outline Code of Construction Practice (Revision C) Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through 7.2 Outline Code of Construction Practice (Revision C) Section 6 (Socio-economics, Recreation and Tourism) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).

Topic	Comment	National Grid's response
Land and property	With the proposed temporary roads also opens the issue of hare coursers and trespasses to be able to easily access woodland areas and agricultural fields, causing even more damage and harm to the local environment.	The Applicant proposes to install gates at the site access points leading to the temporary haul roads and at the crossover points where the temporary haul roads cross the public highway. The Applicant also proposes to install fencing along the temporary haul roads. 2.6.3 Design and Layout Plans - Traffic and Transport [APP-043] illustrate the proposed site access point gate and temporary haul road fencing. Both these measures will help to minimise the occurrence of the issue raised by the respondent. In addition, a free contact number, Project email and freepost address will be provided, which members of the public can use to raise any concerns or complaints.
Historic Environment	Mountnessing is a village built on Roman foundations. The archaeological value of land in our village is richly diverse and important to our village fabric and history. Building pylons into deep concrete structures would destroy this historical importance forever.	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on below ground archaeological remains in Mountnessing Parish. A comprehensive desk-based assessment and walkover have been undertaken (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]), along with archaeological evaluation (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 to AS-076], 6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [APP-213 and AS-078], 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). This has identified archaeological sites, both scheduled and non-designated, along the proposed route. Where sites of archaeological significance were identified, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant will ensure that any residual impacts are minimised and that appropriate mitigation measures are in place (see 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]). Thus far, the desk top assessment and geophysical survey of the Order Limits within Mountnessing Parish have identified former field boundaries and a possible WWII bomb crater.
Water environment	The landscape surrounding the proposed route through our village is one that is prone to severe, regular flooding after heavy rainfall. The River Wid which runs through the proposed route, directly	It is acknowledged that areas such as these are susceptible to flooding in 7.9 Flood Risk Assessment [APP-331]. Works in these areas would be programmed to avoid periods of flooding. Appendix B of 7.9 Flood Risk Assessment [APP-331] describes the review that has been undertaken to identify pylons located within the fluvial floodplains of watercourses and summarises the compensatory storage calculations. As shown in this Appendix,

Topic	Comment	National Grid's response
	alongside the pylons, regularly bursts its banks and flooding, meters deep occur in neighbouring roads and fields. The river is home to a rich array of wildlife and species, and proposed development in this area would destroy wildlife and habitat that is irreplaceable.	there are two pylons in the River Wid floodplain that compensatory storage would be provided for. Section 4.8 of 7.9 Flood Risk Assessment [APP-331] provides detail on the mitigation measures that would be in place with respect to fluvial flooding during construction and operation. The River Wid and its surrounding habitat has been subject to a range of ecology surveys and potential impacts on the river habitat and the associated protected species have been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No significant residual effects on ecological receptors associated with the River Wid have been identified.
Landscape and Visual	Our village is fortunate to have beautiful views looking into the Wid Valley from the highest points in the village. These views will be destroyed should the pylon scheme be passed. Blotting the landscape with huge 52m structures for future generations.	The Applicant notes the concerns raised regarding the Wid Valley. Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential visual impacts of the Project. National Policy Statement EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. A Landscape and Visual Impact Assessment (LVIA) has been undertaken as part of the Environmental Impact Assessment of the Project. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The LVIA recognises that there will be significant visual effects of the Project during its construction and operation (and maintenance). The LVIA is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and identifies effects in relation to the Wid Valley. Significant adverse residual effects on visual receptors are identified up to a distance of approximately 1.5 km within Visual Receptor Area (VRA) F11 Margaretting and Stock (paragraphs 13.9.123 to 13.9.135), VRA G1 Ingatestone and Fryerning (paragraphs 13.10.1 to 13.10.12) and VRA G4 Ingrave and Herongate (paragraphs 13.10.37 to 13.10.48), as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. These findings are supported by the relevant viewpoint assessment findings which identify significant and adverse visual effects. This includes Viewpoint 7.01: Ingatestone Road, Buttsbury (just outside of Mountnessing Parish) and Viewpoint 7.02: Old Church Lane, Mountnessing Hall both of

Topic	Comment	National Grid's response
		which can be found in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232] .
Consultation	With regards to the public consultation events and awareness to villages affected by these proposals, we believe that there has been a severe lack of awareness made to impacted residents in villages along the route. Not everyone is able to attend the Brentwood Centre. We have a substantial sized village hall in our village, and we have never been approached by National Grid to hold such an event to enable our residents to be fully informed of your plans.	In arranging public information events, the Applicant sought to provide opportunities for engagement across the route, taking account of venue availability, accessibility and geographic spread. It was not practicable to hold events in every settlement along the route, and the Statement of Community Consultation did not propose to do so. Events were therefore supported by online materials and written consultation documents to enable residents who could not attend a particular venue to engage with the proposals and provide feedback in other ways. Residents of all affected communities, including Mountnessing, were able to engage through multiple channels. These included attending events held in nearby locations, accessing consultation materials online, requesting hard-copy information, participating in webinars, and responding in writing.
N/A	Please accept this response, along with our previous responses in 2022 and 2023, which maintain our strong objection to this proposal.	Noted.

2.44 Nettlestead (Suffolk) Parish Meeting

2.44.1 Table 2.44 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Nettlestead (Suffolk) Parish Meeting **[RR-2670]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.44 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	Nettlestead Parish Meeting recognises the need for increased electricity generation. But it strongly believes that the current proposals are piece-meal and ill-thought through and that more sensible transmission methods – such as an undersea route – should be chosen. If overhead transmission is chosen, then the Meeting welcomes the decision not to double-up on the existing route which would impact the parish more than the proposed route will.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and visual	The Meeting's main concerns are the following:- 1. Visual impact on the surrounding countryside. There is already a proliferation of transmission lines and pylons to the north-east and east of the parish. The proposed route will effectively	The Applicant notes the concerns raised regarding the visual impact in the countryside around Nettlestead Parish. The Project has been designed in line with National Policy Statement EN-5 (2024), which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. With the exception of nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts.

Topic	Comment	National Grid's response
	surround the parish with the same.	The Applicant has sought to reduce visual impacts, as far as practicable, through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment and has also incorporated the rationalisation of existing overhead lines such as the removal of a section of existing 132 kV overhead line close to the western boundary of the Parish. The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the Environmental Impact Assessment. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁶⁵. The assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The assessment of visual effects considers effects on the visual amenity of people and is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance), including at Nettlestead (Viewpoint 2.25: Nettlestead Road, Nettlestead in Visual Receptor Area (VRA) B13 Somersham). Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
Transport and traffic	2. Impact of construction traffic. Significant additional traffic will be brought onto the local road network during the construction phase. Main Road/Lower Road Somersham is frequently closed for various reasons with drivers choosing an unofficial diversion via Valley Road and	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network. As set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B) , construction traffic will use the Strategic and Major Road Networks to access the region. From Strategic and Major Road Networks, construction traffic will be routed along prescribed Primary Access Routes (PARs) to the site access points, from which traffic will be routed off the public highway along haul roads. The Applicant is not proposing PARs through Nettlestead therefore construction traffic will not be routed on local roads through the Parish. Construction traffic will also not be routed through Little Blakenham or Somersham, therefore, an increase in the existing

⁶⁵ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
	Hall Lane Nettlestead/Little Blakenham. Vehicle movements should be kept to the minimum necessary and should be prohibited from using single track roads	rat-running through Nettlestead is not expected as a result of the Project. The PARs near to Nettlestead are PAR 20 on Bullen Lane and PAR 21 along B1113 Bramford Road / Loraine Way. The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333]. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse riding on the roads along the PARs located in the Local Road Network. The Applicant has assessed driver delay/public transport passenger delay, pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation and road safety in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] on PARs 20 and 21. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] it was concluded that there would be no significant residual construction effects as a result of increased traffic when taking account of the mitigation detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). Around Nettlestead/Somersham, the Applicant is not proposing to close Main Road/Lower Road during construction. Main Road/Lower Road has been identified as a diversion route for other short-term temporary closures in the area, such as Blood Hill. This is displayed in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section B [APP-034] Sheet 18 and 19. Valley Road and Hall Lane in Nettlestead/Little Blakenham have not been identified as temporary diversion routes. In the event that any traffic diversion routes are required, temporary signage will be installed in accordance with relevant signage design guidance. 7.3 Outline Construction Traffic Management Plan (Revision B) highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project.
Needs Case	3. Proposed transmission capacity. A common concern is that additional transmission capacity will be required in future, as electricity generation in the region grows. The pylons	There are limitations as to what an energy transmission circuit can carry, and these are defined by the International Electrotechnical Commission (IEC), which set ratings for 420 kV transmission, of 5,000 amperes being the highest available equipment. This equates to: • A capacity on a single circuit of 3465 MVA (megavolt-ampere)

Topic	Comment	National Grid's response
	should be dimensioned to be capable of further enhancement within the same footprint. Consideration should be given at this stage to how future enhancements to capacity would be made.	A double circuit of 6,930 MVA. The Applicant's proposal is designed to meet this maximum IEC 5,000 ampere rating providing the highest capacity available for a circuit.
Land use	Impact on farmland and farming. Erection of pylons will inevitably take agricultural land out of production temporarily during the construction phase, and permanently through their footprint. Recent experience of maintenance and upgrading of existing lines has required temporary tracks being laid on crop land to reach the pylons. It has also resulted in sundry ironwork being dropped across the underlying fields. This has necessitated repairs to farm equipment and emergency treatment for cattle who have ingested small components. Rigorous attention must be paid to these impacts both during construction and subsequent maintenance.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade across the Project. No agricultural land within Nettlestead Parish lies within the Order Limits. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] assumed that farming operations would not continue within construction areas. However, disruption to surrounding farming operations would be mitigated by implementing good practice measures. These include maintaining or providing alternative access to affected land parcels in communication with landowners and occupiers to allow for the continuation of surrounding farming operations, maintaining or providing alternative water supplies for livestock, and reinstating any land drains affected by the Project within the Order Limits. These measures form commitments AS03, AS04, and AS05 within 7.4 Outline Code of Construction Practice [REP2-014]. In addition, effects on farming operations during the construction phase would be managed through compensation agreements to allow landowners to claim for loss of income as a result of the Project (which lie outside of the Environmental Impact Assessment process). 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] notes that all land required temporarily would be reinstated to its pre-construction condition, including land grade with all works undertaken in accordance with good practice as set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. As such, once land has been returned, pre-construction land use will be able to continue, including local food production.

2.45 North-West and South-West of Chelmsford Parishes Group

2.45.1 Table 2.45 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by North-West and South-West of Chelmsford Parishes Group [RR-2765]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.45 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Objection	The Parish Councils in the North-West and South-West of Chelmsford Parishes Group (‘the Parishes Group’, ‘the Group’) are: Broomfield; Chignal; Great Waltham; Highwood; Ingatestone and Fryerning. Little Waltham; Margaretting; Roxwell; and Writtle. The Group therefore represents all the communities in a broad area stretching from the north of Chelmsford to Ingatestone in Brentwood District, all of which are impacted by the current application. There are four broad areas of OBJECTION underlying the Group’s opposition to the application. These are explained in more detail in the Group’s response to the formal consultation in 2024 (which will be attached to these comments once the	The Applicant disagrees with the Parishes Group for the reasons set out against the specific points below.

Topic	Comment	National Grid's response
	relevant code has been issued).	
Planning policy	3. THE IMPACT OF THE APPLICATION ON THE SENSITIVE LANDSCAPE AND HERITAGE ASSETS ALONG THE ROUTE. The Group believes that National Grid's (NG) legal duty under Schedule 9 of the Electricity Act 1989 has not been met, given the other options to mitigate impact by alternative means of transmission; or, in the Chelmsford area, by an alternative route.	The Applicant does not agree with the respondent as it must, and its position is that it does, meet its duties across a range of regulatory requirements. On this particular point Section 2.3 of 5.6 Planning Statement [APP-085] sets out how the Electricity Act 1989 applies statutory duties to the Applicant in developing and maintaining the national electricity transmission network. These statutory duties are referenced and reflected in National Policy Statement (NPS) EN-5 (2024), the relevant national policy statement for nationally significant electricity transmission infrastructure. 5.6 Planning Statement [APP-085], in assessing and evidencing the overall compliance of the Project with the relevant NPS and other planning policy, also sets out how the Applicant has had due consideration to its statutory duties under the Electricity Act 1989. We address the question of why other routes are less preferred partly at item 3 below and partly as set out in the 5.15 Design Development Report [APP-122] in Section 9.2 and paragraph 9.2.4 in particular
Landscape and Visual	The landscape and visual harms arising from the proposal are set out in a study by Alison Farmer Associates, commissioned by the Group (attachment to follow).	This is responded to in our response to item 3 below.
Planning policy	In addition to landscape, visual and heritage considerations, the Group contends that, given the alternatives, insufficient regard has been paid to: topography and the application of Holford Rules 4 and 5;	The Applicant disagrees that the Holford Rules have not been considered or given insufficient regard. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment process to inform the balance and define our proposals that we take

Topic	Comment	National Grid's response
	the level of consideration of impact on the Best and Most Versatile Agricultural Land required by the NPPF; policies and designations within adopted Neighbourhood Plans in Broomfield and Writtle; and to more local landscape studies (district and parish level).	forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. In response to the comment about referencing Neighbourhood Plans and district/parish landscape studies, the Applicant notes that Neighbourhood Plans were given consideration, as noted on page 102 of 5.6 Planning Statement [APP-085]. The Broomfield Neighbourhood Plan Landscape Appraisal⁶⁶ illustrates local character areas A–H which are based on the Broomfield Community Landscape Character Assessment⁶⁷. It is noted that the Project passes through Broomfield Neighbourhood Plan Landscape Appraisal area G and close to area H. Area G sits within Central Essex Farmland Landscape Character Area (LCA), and Chelmer Valley LCA. Area G sits within Chelmer Valley LCA, and Chelmsford and Environs LCA. Likewise, the Writtle Neighbourhood Plan⁶⁸ identifies LCAs CA1 Writtle Farmland Plateau and CA3 Blackmore Wooded Farmland, that the Project passes through, in addition to CA2 Can and Wid River Valley that lies to the south and east of the Project. These areas reference the Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments by Chris Blandford Associates⁶⁹, which fall within the Central Essex Farmlands LCA, the Chelmsford and Environs LCA, and the Brentwood Hills LCA. The assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Significant landscape effects are reported within approximately 1.5 km of the Project in the Central Essex Farmlands LCA (paragraphs 13.3.654 to 13.3.678) and Chelmer Valley LCA (paragraphs 13.3.699 to 13.3.717); within approximately 0.5 km of the Project in Chelmsford and Environs LCA (paragraphs 13.3.718 to 13.3.735); and

⁶⁶ Alison Farmer Associates (2019) *Broomfield Neighbourhood Plan Landscape Appraisal*

⁶⁷ Broomfield Parish (2010) *Broomfield Community Landscape Character Assessment*

⁶⁸ Writtle Parish Council (2021) *Writtle Neighbourhood Plan*

⁶⁹ Chris Blandford Associates (2006) *Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments*

Topic	Comment	National Grid's response
		within approximately 1.5 km of the Brentwood Hills LCA (paragraphs 13.3.736 to 13.3.756). In relation to agricultural land, the assessment of impacts on best and most versatile land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within North-West and South-West of Chelmsford Parishes (predominantly Grade 3a land with smaller extents to Grade 2 and Grade 3b land).
Alternatives	1. INSUFFICIENT CONSIDERATION OF ALTERNATIVE METHODS OF ELECTRICITY TRANSMISSION, SUCH AS OFFSHORE AND UNDERGROUND HVDC SYSTEMS, INCLUDING THE LIFETIME COST BENEFITS OF THESE ALTERNATIVES. The methodology underlying the application appears to ignore that electricity is generated in the North Sea, not in Norwich. Even accepting the starting point of Norwich as a given, the application does not give sufficient regard to the advantages of underground HVDC cabling over this extensive distance of 180km,	The Applicant disagrees and its position is that it has carefully considered alternatives throughout the development of the Project and presented information setting out why the alternatives were less preferred. 7.19 2023 - Strategic Options Backcheck and Review [APP-357] considered all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). The Applicant also notes that all options are associated with other costs but, as set out in the recent Institution of Engineering and Technology: A Comparison of Electricity Transmission Technologies: Costs and Characteristics⁷⁰, the differences are stark. Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly

⁷⁰ Institution of Engineering and Technology (2025) *A Comparison of Electricity Transmission Technologies: Costs and Characteristics*

Topic	Comment	National Grid's response
	as an alternative to overhead lines with the significant component of higher cost HVAC cabling in the Dedham Valley National Landscape. The Group is also unconvinced that the full cost of overhead lines has been fully included, when taking into account compensation to affected property owners, bill reductions to affected homes, Biodiversity Net Gain, carbon emissions, etc (not to mention community capital).	interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	1. ALTERNATIVE ROUTING OF OVERHEAD LINES IN THE CHELMSFORD AREA. Even accepting overhead cabling as a given, it is very clear that NG has not fully considered the option of an alternative route to the east and south of Chelmsford. The attached report by Alison Farmer Associates has studied the relative harms of these alternatives and concludes that an alternative route to the east of Chelmsford, close paralleling the existing 440kv overhead line by undergrounding and replacing sections of the	The Applicant would remind the Examining Authority that its starting point for the assessment is the government's strong starting presumption for overhead lines. It also notes that there are circumstances when this presumption is reversed and underground cable is utilised or where effects exceed defined thresholds for landscape effects and cable can be justified. However, no such locations that could achieve the reversal of the National Policy Statement (NPS) EN-1 (2024) provision are present, nor meet the threshold for consideration of underground cables. The Applicant would also note that a number of engagements have been undertaken with a representative of this group at various consultation events and direct contacts. The suggested alternatives propose different arrangements for seeking to lead to a re-location of the proposed connection. In terms of routes further to the west we would refer the ExA to the 5.15 Design Development Report [APP-122] and specifically our conclusions at paragraph 9.2.4 that it was less preferred as whilst reducing some effects it transferred others and was longer and less direct. Other changes, including those reviewed in the Alison Farmer report, also seek to change the route from passing to the north and west of Chelmsford and to instead pass to the east of Chelmsford. From here there are alternatives to south-west and south-east to connect to Tilbury. The main rationale for the move has been cited to us as to seek to route the new connection in the

Topic	Comment	National Grid's response
	existing 132kv line, would lead to significantly fewer harms than the proposed route. It would therefore be more consistent with NG's legal duties under the Electricity Act 1989. Furthermore, NG's own comparative route studies (within the Corridor Preliminary Routeing and Substation Siting report, 2022) appear to present no fundamental objection to such an alternative route being pursued. The deciding factor for choosing the current route to the north and west of Chelmsford appears to have been technical simplicity – but crucially without consideration of appropriate mitigation such as selective undergrounding and rationalisation of lower power lines (which emerged as a consideration only at a later stage in 2024).	proximity of existing overhead line structures (both 400 kV and 132 kV lattice pylon lines are present). The Applicant has considered this feedback each time it has been raised but continues to arrive at the same conclusion. That is, that there is no readily identifiable overhead line route to achieve the connection in full. Much is made by the respondent of individual extracts from Options Appraisal Summary Tables; however, there remain some fundamental constraints such that the Applicant's position remains unchanged. In terms of routes to Tilbury we have concluded there is insufficient space for an additional 400 kV overhead line to be routed via the east then south-east of Chelmsford then routeing via corridor Q, or via a deliverable variant of Corridor Q. If a connection could be made to pass to the east of Chelmsford, the route via corridor Q becomes highly constrained. The main areas of difficulty arise around Rayleigh and on the subsequent section to Tilbury where there are locations where predominantly residential development limits the routeing of a new connection (with or without potential to underground sections of 132 kV connection). Over and above this, the alternative presents its own environmental effects including proximity to areas identified as Special Protection Areas where the legislation places emphasis on favouring alternatives without or with reduced effects on such areas and their qualifying features. The other alternative is to route to the east and then south of Chelmsford. However, whilst noting the opportunity in some sections to adopt an alignment close to the existing 400 kV overhead line (potentially in place of an undergrounded 132 kV connection) the overall conclusion and position of the Applicant is that the route is not achievable as overhead line or underground cable due to the combination of numerous residential properties, a school and a UK Power Networks substation amongst other infrastructure around Sandon. In theory there may be an opportunity to use a tunnel to avoid such features but this adds effects in its own right over and above those associated with the alternative and would add to what would otherwise be broadly comparable costs. Whilst appreciating that these alternatives seemingly address concerns of the north-west and south-west Chelmsford Parishes, the Applicant's position is that the alternatives do not justify a change. They lead to their own environmental effects, albeit a different balance transferred to other locations. They are substantially constrained at some locations to the extent that they may not be deliverable, or only deliverable with methods with substantial additional costs. On this basis the Applicant remains clear in its view that the preferred arrangement is the submitted Project.

Topic	Comment	National Grid's response
Consultation	2. DEFICIENCIES ARISING FROM NG'S 'DECIDE AND DEFEND' APPROACH TO DECISION-MAKING AND CONSULTATION. Whilst accepting that the Inspectorate has concluded that the application meets minimum standards for consultation, the Parishes Group contends that the application does not conform to broader consultation requirements, such as the Gunning Principles which require inter alia that consultation takes place when 'Proposals are still at a formative stage' and 'A final decision has not yet been made, or predetermined, by the decision makers.'	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Consultation	NG appears to follow a different approach of making decisions internally, informing affected communities and then seeking to take account of objections through a complicated system of 'back-checking' – which is inevitably no substitute for open consideration of options at the outset. Leaving aside deficiencies of due process, the	The Applicant notes that any and all routes have the potential for effects and changes such as proposed by the respondent will transfer effects to other homes and environmental receptors. The Applicant notes the concerns raised by the Parishes Group regarding the approach to engagement and the consideration of routeing options around Chelmsford, but does not agree that decisions were made internally and then retrospectively justified through consultation. Route selection and design development were informed through an iterative process that combined technical, environmental and consultation inputs from the outset, rather than a predetermined approach. Non-statutory consultation undertaken in 2022 and 2023 sought views on a corridor and graduated swathe and feedback received at this stage informed the identification and refinement of emerging proposals. Local knowledge and

Topic	Comment	National Grid's response
	Group believes this leads to poorer outcomes. The problems of this approach are illustrated by NG's consideration of potential routes around Chelmsford, as outlined above. Decision-making has therefore failed to exploit the benefits of local knowledge, expertise and challenge which can only be realised through open, non-determined consultation. In particular, the Parishes Group is concerned that NG agreed to hold a dialogue with the Group to consider the best routing options around Chelmsford. It held one meeting with the Group in July 2024, but then without explanation failed to engage in further meetings as agreed. This underlines the Group's concerns that the best options have not been identified and pursued in the application and the processes leading up to its submission.	stakeholder feedback were an important part of this process and contributed to changes that were subsequently presented at statutory consultation. The Applicant therefore considers that the benefits of local knowledge, expertise and challenge were sought and taken into account through an open and iterative consultation process, rather than through a process of 'back-checking' objections to fixed decisions. The meeting held with the Group in July 2024 formed part of the Applicant's wider programme of engagement during the development of the Project and provided an opportunity to discuss local issues and considerations relevant to route selection. While no further meetings took place, the Applicant continued to listen to and consider feedback throughout both non-statutory and statutory consultation. Many of the changes presented at statutory consultation were informed directly by feedback received during the 2022 and 2023 non-statutory consultations. Ongoing engagement focused on the evolution of the proposals, including the 2024 preferred draft alignment, pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation, changes to the route since the previous consultation, and matters relating to access and permanent and temporary haul roads. Consultation was focused on proposals that the Applicant was actively developing and reasonably considered to be deliverable, in line with statutory guidance for Nationally Significant Infrastructure Projects. Feedback received during statutory consultation informed how the proposals were further developed. Where that feedback resulted in significant changes compared with what had been presented at statutory consultation, the Applicant undertook targeted consultation with directly affected properties between January and April 2025. The Applicant considers that routeing options were assessed through an iterative process informed by technical, environmental and consultation inputs, rather than being predetermined. Details of how consultation feedback was considered, and where changes were made as a result, are set out in the 5.1 Consultation Report [APP-066] and the 5.15 Design Development Report [APP-122]. The Applicant does not consider that the absence of further meetings with a particular group demonstrates that the best routeing options were not identified or pursued, and consultation should be considered in the context of the full range of engagement activities undertaken throughout the development of the Project.

2.46 Royal Mail

- 2.46.1 Table 2.46 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Royal Mail [RR-3203]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.46 Comments and National Grid's response

Topic	Comment	National Grid's response
Transport and Traffic	Royal Mail Group Limited (RM) supports National Grid's Norwich to Tilbury Project, however it is seeking to ensure that its road-based operations are not adversely impacted by construction traffic and any changes to local highway capacity during the scheme's 4 year construction phase. RM has c23 operational properties within c5km of the proposed scheme's route. These operational facilities rely on frequent use of the local road network on a daily basis. Accordingly, RM wishes to draw its operational obligations and requirements to the attention of both the Applicant and the Examining Authority.	The Applicant notes and welcomes the respondent's support for the Project. The construction vehicle routeing strategy has been designed to minimise impacts across the highway network, as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). 7.3 Outline Construction Traffic Management Plan (Revision B) highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project. The Applicant has undertaken a complete and full assessment of traffic routes proposed to be used by construction vehicles to understand and minimise the impact on the local highway network. This assessment would include any roads that may be used by the Royal Mail C23 operational properties, within the assessment scope. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse riding in terms of amenity, severance and fear and intimidation on the roads along the Primary Access Routes (PARs) located on the Local Road Network. The assessment on the significance of effects of driver delay for all PARs is presented within Table A16.4.2 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Further details of the assessment of all PARs can be found within 7.11 Transport Assessment [APP-333] submitted with the Development Consent Order application, which examines capacity of key sensitive junctions, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Section 7 of 7.11 Transport Assessment [APP-333] presents the finding of junction modelling at key sensitive junctions along the PAR. Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National

Topic	Comment	National Grid's response
		Highways to minimise likely adverse impacts at junctions on driver delay. Details can be found within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B).
Transport and Traffic	Furthermore, RM is registering as an Interested Party to reserve its position to make further representations at the Examination, if required. Under section 35 of the Postal Services Act 2011, RM has been designated by Ofcom as a provider of the Universal Postal Service. RM is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on RM, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. RM's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any	The Applicant notes Royal Mail's comments and duties and is committed to minimising disruption on the local highway networks.

Topic	Comment	National Grid's response
	statutorily authorised project. Accordingly, RM seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	
Traffic and Transport	RM's postal sorting and delivery operations rely heavily on road communications. It's ability to provide efficient mail collection, sorting and delivery to the public is highly sensitive to changes in the capacity of the highway network. Having reviewed the outline CTMP (August 2025) and noted the reference to RM at paragraph 5.3.14 in relation to AIL deliveries, RM is of the view that the construction phase of this scheme has potential to impact on its operational interests, especially when combined with potential cumulative highways impact of other major developments in the surrounding area. In order to protect RM's position, it is requested that specific wording is added to the Framework Construction Traffic Management Plan (CTMP) to	This feedback has been acknowledged by the Applicant. 7.3 Outline Construction Traffic Management Plan (Revision B) will be updated during the Examination, and will include a commitment, that where practicable, the Applicant will inform the relevant Local Authority and other relevant stakeholders (such as Royal Mail) of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest possible opportunity. Section 2.4 of 7.3 Outline Construction Traffic Management Plan (Revision B) sets out how the Applicant is proposing to coordinate the street works required for the Project through the Permit Schemes that are in place and operated by the Local Highway Authorities (LHAs). It is anticipated that this information will be publicly available on the Project website and the relevant LHA's website. It is expected that Royal Mail will follow business as usual procedures to managing these road closures. In accordance with commitment GG30 in 7.2 Outline Code of Construction Practice (Revision C), members of the community and local businesses will be kept informed regularly of the works through active community liaison. The Outline Construction Traffic Management Plan is secured through Requirement 4 of 3.1 Draft Development Consent Order (Revision C). In 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], the traffic flows for committed developments have been combined with the Project construction traffic flows when undertaking the cumulative assessment against future baseline traffic. This assessment has been undertaken using the worst-case week peak daily (07:00-08:00 hrs) construction traffic increases on all Primary Access Routes (PARs). Further details of the significance of residual construction effects for all PARs are presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Where required, mitigation measures have been proposed and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative

Topic	Comment	National Grid's response
	secure the following mitigations for the benefit of RM: the CTMP should include specific requirements that during the construction phase RM is notified by the Applicant or its contractors at least two months in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; where road closures / diversions are proposed, the Applicant or its contractors liaise with RM at least two months in advance to identify and make available alternative highway routes for operational use, where possible; and cumulative highways impact from other major developments in the surrounding area is fully addressed by the applicant.	impacts. Details of mitigation are set out within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). Sensitive junctions along the local road network were subject to AM and PM peak hour modelling assessments as presented within Section 7.11 of 7.11 Transport Assessment [APP-333]. These assessments considered the cumulative effects on the highway network of the Project and other committed developments against future baseline traffic at the junctions, with mitigation proposed where required as outlined within the 7.3 Outline Construction Traffic Management Plan (Revision B).

2.47 Roydon Parish Council

- 2.47.1 Table 2.47 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Roydon Parish Council **[RR-3204]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.47 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	Roydon Parish Council (RPC) objects to National Grid's planned Norwich to Tilbury pylons project.	Noted.
Consultation	We believe that National Grid's consultation has neither been open or transparent, especially on the alternatives to pylons, such as more partial undergrounding, a complete undergrounding along the route using High Voltage Direct Current (HVDC) cabling, or an offshore grid. It has failed to provide comprehensive, clear and justified costings for these alternatives in the same manner as the pylons, making it impossible for the public and local authorities to make meaningful comparisons. Instead, throughout the earlier consultations and subsequently, National Grid has tried to bat away such	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007]. The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. Further detail on how alternatives have been considered is provided below.

Topic	Comment	National Grid's response
	alternatives with vaguer statements and generalised costings backed up with minimal evidence, a sort of “take our word for it” approach, treating communities condescendingly and arrogantly. This is reflected in the fact that since the project began very few amendments have been made in our area despite widespread objections, with little or no feedback given as to why those objections were invalid. It is also reflected in the fact that the online project map for our parish was, at the time the Planning Inspectorate opened its registration, not even accurate. Throughout, many have felt that the plan is a fait accompli and that National Grid have been going through the process as a box-ticking exercise.	
Alternatives	We believe that the Planning Inspectorate and the government cannot make a decision on this project until a full and transparent evaluation of the alternatives has been made - offshore transmission, more partial undergrounding	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including

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	and the use of High Voltage Direct Current (HVDC) throughout the whole route overland. These would produce much less environmental and visual damage. HVDC is considered the second best option after an offshore grid by Roydon Parish Council. Pylons are an old technology for overland transmission belonging to the early 20th century. This is recognised by National Grid along with the fact that they damage our landscapes. The Grid are removing pylons in other parts of the UK. Why is East Anglia different? The Grid have failed to explain in detail why countries such as Germany are doing away with pylons in favour of the alternatives, and why this is not right for the UK.	pylons, are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357] with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers, offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Costs	When National Grid presented us with costings for pylons in its consultations, they were using those from 2012 - when new technology was not so advanced as the present time. This was and remains	Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] presents the costs, based on a transparent economic appraisal. All costs are in 2020/21 cost base. Appendix D makes reference on page D1 to the 2012 independent The Institution of Engineering and Technology (IET) Transmission Costing Study⁷¹ as an independent point of reference for cost comparison. To be clear, the Applicant's costs have always been in the 2020/21 cost base and based upon the Applicant's data.

⁷¹ Parsons Brinckerhoff (2012) *Electricity Transmission Costing Study. An Independent Report Endorsed by the Institution of Engineering and Technology*

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	misleading, a further reflection of the lack of transparency in the process. The then Minister for Energy Security and Net Zero, Justin Tomlinson, made this clear in the House of Commons when he said: "We had a deep dive discussion about overhead cables being the strong starting presumption, which in simple terms is based on the cost, as per the electricity system operator's 2012 figures. I am sure that the House would recognise that, since 2012, significant advances have been made to new technology."	On 29 April 2025 the IET updated their independent report A Comparison of Electricity Transmission Technologies: Costs and Characteristics ⁷² . The Applicant has reviewed this independent report and is satisfied it continues to benchmark against the options provided in 7.19 2023 - Strategic Options Backcheck and Review [APP-357] .
Agriculture and Soils	We have significant concerns about the impact of this project on the nation's food security. East Anglia is vital to food production in Britain but the wave of new power generating infrastructure, including the Norwich to Tilbury project, in the region will compromise and use farmland of grade 3 and above.	Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions, etc. The Department for Environment, Food and Rural Affairs' UK Food Security Report 2024 ⁷³ states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] . This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed ALC surveys, of the extent of each land grade within Roydon Parish (predominantly Grade 3a with smaller

⁷² Institution of Engineering and Technology (2025) *A Comparison of Electricity Transmission Technologies: Costs and Characteristics*

⁷³ Department for Environment, Food and Rural Affairs (2024) *UK Food Security Report 2024*

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		extents of Grade 2 and Grade 3b land). National Grid has sought to minimise impacts on BMV agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As critical national priority infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available.
Landscape and Visual	We oppose NG's plan for pylons through the Waveney Valley because of the great harm it would do to this valued landscape. The route proposed would take the pylons through the narrow gap between the rare habitats of Roydon Fen and Worham Ling. Suffolk Wildlife Trust described Roydon Fen, a County Wildlife Site, as a 49 acre reserve that offers a sense of the wildness a landscape of extensive wetland once would have offered. Worham Ling is a Site of Special Scientific Interest (SSSI) composed of acid grassland and dry heath. The setting of both would be damaged forever by 50m high pylons. A joint Suffolk and Norfolk County Councils Valued	The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, including within the Waveney Valley. The assessment is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Judgements on landscape value were made as part of the assessment in Annex A: Landscape Value Assessment in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. These value judgements were informed by the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations⁷⁴. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3). The value judgements were informed by a range of sources including the Waveney Valley Valued Landscape Assessment⁷⁵. Worham Ling Site of Special Scientific Importance (SSSI) and Roydon Fen County Wildlife Site (CWS) have both been carefully avoided by the Project so there would be no direct impacts. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce indirect impacts on designated sites. No residual significant effects on either Worham Ling SSSI or Roydon Fen CWS have been identified.

⁷⁴ Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*.

⁷⁵ Alison Farmer Associates (2024) *Valued Landscape Assessment - Waveney Valley*

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	Landscape assessment noted that "...the length of the Waveney Valley expresses many special qualities, and in the context of Suffolk and Norfolk, it is considered to be a valued landscape. Conserving and enhancing the special qualities articulated in this report is a key aspiration of existing planning policy."	
Biodiversity, ecology and nature conservation	The Waveney Valley is described by Suffolk Wildlife Trust (SWT) as "part of a chain of fens that are strung like jewels along the Suffolk and Norfolk border. This wildlife corridor contains bat roosts as well as Schedule 1 protected bird species such as Barn Owl, Heron and Swift. The valley consists of rare peatland water meadows and, recognising this fact, SWT recently embarked with other bodies upon a long-term project, with the support of government funding, to connect and improve the river valley between Diss and the headwaters of the Little Ouse to the west which includes all that part of the Waveney Valley within Roydon Parish.	A full range of ecology surveys have been undertaken in the Waveney Valley between 2022-2025. Current surveys have not identified any bats roosts or any Schedule 1 birds within the Order Limits at this location. Full details on the survey results and assessment of impact are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The Applicant has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The construction haul road has been removed between pylons RG87–88. The permanent access is a right of access only for ongoing maintenance, i.e. no physical permanent works are required and impacts on the WaLOR project would be minimal. The Applicant is committed to ongoing collaboration with the WaLOR project team to ensure both projects can be delivered.

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Landscape and Visual	Pylons would be a huge visual intrusion on this section of the valley. Undergrounding through this part of the Waveney Valley would be damaging but at the least would remove their visual impact - as long as proper care and consideration was given to the location of highly intrusive CSE compounds at either end. The fact that undergrounding is happening in Dedham Vale is proof that National Grid understands the visual damage that pylons cause. Dedham Vale may be an Area of Outstanding Natural Beauty, but to our residents the Waveney Valley is as beautiful and important a landscape as Dedham Vale is to residents and visitors there.	In accordance with National Policy Statements EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. The Applicant has explored a number of options for the Waveney Valley crossing, including alignments further east and west of the final alignment and an undergrounding option that would cross the Waveney Valley in the same location as the final alignment. All the proposed routes were considered with acknowledgement of heritage, ecological, geological, socio-economic, landscape characterisation and visual impact concerns as well as the Waveney and Little Ouse Recovery (WaLOR) proposals (a Suffolk Wildlife Trust and Environment Agency project). The process by which the proposed route was selected can be found in section 4.6 Crossing of the Waveney Valley in document 5.15 Design Development Report [APP-122], with the following conclusion: <i>‘Overall, in terms of routeing at Diss for the crossing of the Waveney Valley, it has been concluded that the alignment (comprising an overhead line) is preferred. Despite the refinement since the statutory consultation, effects arising from the overhead line, including on landscape, community effects and heritage assets, are acknowledged. However, they are not considered to be at a level that engages the policy tests in NPS EN-5 (DESNZ, 2024b) for the use of underground cable in circumstances where the land is not associated with nationally designated landscapes. Even if the test were engaged, there would be detrimental consequences from the use of underground cable either for the WaLOR project, on ecology and soils, or because it is at a cost not justified in terms set out in NPS EN-5.</i> <i>Alternative routes with some element of underground cable meet similar challenges. It is National Grid's opinion that these alternative routes are less preferred and that tests in NPS EN-5 Paragraph 2.9.23 are not engaged. Even if the tests were engaged, National Grid's view is that the level of effects are insufficient to clearly meet the terms required by the policy and also that, given the additional adverse effects arising from the installation of underground cables, the change in level of effects does not justify the additional costs.</i>

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		<i>On this basis, it is considered that the alignment comprising overhead line remains preferred.'</i> The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within the Waveney Valley are set out under Visual Receptor Areas (VRA) A11 Fen Street, A12 Roydon and Diss, B1 Wortham and B2 Palgrave in paragraphs 13.4.120 to 13.5.24 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within the Waveney Valley are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] in paragraphs 13.3.155 to 13.3.170 (Waveney Rural River Valley Landscape Character Area), 13.3.198 to 13.3.212 (Wooded Valley Meadowlands and Fens Landscape Character Type) and 13.3.183 to 13.3.197 (Rolling Valley Farmlands and Furze Landscape Character Type).
Historic Environment	The proximity of the pylons to residential properties in Snow Street, Roydon, is concerning. This area has 11 listed buildings, which are heritage assets integral to the character of Roydon village. Additionally, the pylon route just north of the A1066 and just west of Hall Lane, Roydon, is exceptionally close to residential properties along Hall Lane, the west end	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Roydon Parish. The Applicant acknowledges that the settings of some designated assets within Roydon Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] . Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] . The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the

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	of Snow Street and in Darrow Lane. It is, in fact, incredible that it should be proposed to place pylons so close to them in the first place.	Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets, it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Land and property	There is considerable disquiet in the village regarding the purchase by National Grid of The Gables, a listed building on Darrow Lane in Roydon, that will be very close to the pylons and whose setting will be greatly affected by them. This was purchased at a good market rate but has been	The Applicant acknowledges the reference to the Applicant's purchase of Gables Farm and wishes to provide clarification regarding the rationale for this acquisition. It is confirmed that Gables Farm was not acquired because it is required for the Norwich to Tilbury Project. The property itself will not be directly affected by the proposed Project, and no works associated with the Project are planned for the house or immediate grounds. However, it is noted that certain fields associated with Gables Farm are affected by the Project, as depicted on the 2.2 Land Plans [AS 005 to AS-012]. The impact on these fields will be limited to temporary works necessary for the installation of the overhead line, and permanent infrastructure in the form of the oversail of the conductors between towers RG81 and RG82. The Applicant confirms that the property is not required

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	deteriorating since. As a further illustration about the lack of transparency regarding this project, National Grid have not been open about the reason for buying the property or what they plan to do with it, or the land that goes with it. It is apparently the only such property along the entire route that has been purchased in this way. Why this property? What is the precedent that has been set here?	for access, compounds or any other element of the Norwich to Tilbury Project, and for this reason it does not appear within the Project's consultation or land plans. The purchase was unrelated to the heritage status of the property, and there are no proposals to change the use of the building or surrounding land in connection with the Project. Following acquisition of the property, the Applicant has undertaken surveys and necessary maintenance works and intends to dispose of the property on the open market in due course, once it is in a suitable condition for sale.
Health and Wellbeing	The prospect of the implementation of the proposals set out for this project has caused much anxiety and mental stress to many residents, considering not only the prospect of pylons themselves but the high level of local disruption that will happen over the long construction period. Has the mental health impact of this project on people and the cost associated with it been included in the project costings?	The Applicant recognises that uncertainties in the Project planning period can cause stress and anxiety for local people and has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential impacts of the Project on mental health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], particularly in relation to the construction phase. The assessment references various mechanisms by which local residents would be kept informed during the construction phase, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health effects during the construction phase.

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		The Applicant understands from statutory and non-statutory consultation that local residents feel anxious about the potential impacts of the Project on visual amenity. Paragraph 10.7.130 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example, anxiety or stress) due to the operation (and maintenance) phase of the Project. The health and wellbeing assessment draws on findings from 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), which contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. A number of properties to the west of Roydon village meet the thresholds for inclusion in the RVAA. Table A13.4.3 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233] summarises the outcome of the assessment for these properties, a number of which (three properties) trigger the need for further assessment (Stage 4 of the RVAA process) as set out in paragraph 13.5.3 of the RVAA. Table A13.4.9 presents the Stage 4 assessment for each of these three properties, noting that in two instances, introduction of the Project is likely to initially affect use and enjoyment of the garden. For all three properties, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties unattractive places to live. Likely health effects arising from changes to visual amenity are presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The chapter notes that Diss and Roydon ward is characterised as being of medium sensitivity due to its demographic make-up; the chapter also highlights that a small minority of the population are likely to be affected and that change in quality of life may be moderate. This results in a minor adverse (not significant) health effect. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns.

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Traffic and Transport	Local roads are completely unsuitable for the high numbers of HGV movements and general construction traffic that will be associated with the project. Many of these roads have no pavements, blind turns and are single lane. This view has been taken by the County Highways Department in relation to recent planning applications in the area where large numbers of HGV movements and other heavy vehicles were proposed, notably applications in relation to an industrial biofuel plant at Deal Farm, Bressingham. This was ultimately rejected on appeal, largely on the grounds of road safety. National Grid figures revealed during the consultations showed HGV traffic increases to our section of the route ranging from 26% to 75% (the 12 hours from 7am to 7pm on weekdays) depending on the specific site being worked, producing 8,984 additional vehicle movements per day, 795 of them being HGVs. Did National Grid include the associated costs of damage to roads, congestion	The Construction Routeing Strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Network to the site access points. The Applicant is proposing a PAR on A1066. The Applicant is proposing crossover points (locations where haul roads cross the public highway) on a number of local roads including the B1077, Darrow Lane and Bressingham Road. No HGV construction traffic is proposed to use these crossover points to access the haul road from the public highway under typical operation, and vice versa. The construction HGVs will give way to traffic on the public highway at these locations. To present a realistic worst-case scenario, 7.11 Transport Assessment [APP-333] detailed the potential impacts through Diss, if all construction traffic were routed along the A1066 via Diss throughout the working day. The Applicant recognises that there are predicted capacity issues through Diss and therefore proposes that construction traffic be routed through Thetford during network peak hours to avoid adding to capacity issues through Diss during these time periods. The Applicant is currently proposing to route 100% of HGVs via Thetford in the network peak periods (07:00-10:00 and 15:00-19:00); and 50% of vehicles through Diss and 50% of vehicles via Thetford outside these hours. If 100% of construction traffic travelled through Diss this would be a maximum of 31 HGVs per hour (15 in each direction) during a three-week peak construction period. However, with the current access proposal of 50% of construction traffic travelling through Diss outside the network peak hours, this would be reduced to only 14/15 HGVs per hour (seven in each direction) over an indicative duration of three weeks. The current assessment indicates that during a five-month period the number of vehicles will be between 25 and 31 HGVs per hour (including the three week peak). Under the current access proposal this would be 13/15 HGVs per hour (seven in each direction). Construction vehicles then notably reduce to fewer than five HGVs per hour over an 18-month period (three HGVs per hour under the current access proposal). These HGV vehicle numbers are summarised in the table below. A longer secondary peak is then anticipated with a total of 15 HGVs per hour (seven in each direction). This would be four HGVs per hour (two in each direction) under the current access proposal. The Applicant considers it appropriate to retain access along the

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	and health impacts on residents in their project costings?	A1066 through Diss for the construction period, based on the relatively short duration of increase in HGV trips, and the relatively low number of vehicles.		
		Duration	100% through Diss (HGVs per hour)	50% through Diss during Interpeak (2-way). Current proposals (HGVs per hour)
		3 weeks	31	14/15
		5 months	21-31	13/15
		18 months	5	3
		The Applicant undertook an assessment in partnership with the Main Works Contractor(s) to understand the impact and feasibility of routeing all construction traffic via Thetford. The route from Thetford to the Site Access Points is suitable for HGV movements, with minor traffic management required. The source of material for the deliveries for Site Access Points in Diss is anticipated to be to the east of Diss; if access were restricted through Diss, the construction vehicles would be undertaking an approximate 103 km diversion (up to Norwich on the A140, A47 and A11), which would route vehicles on busy parts of the network inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (2024) states that any mitigation (including re-routeing traffic) is only appropriate if it is feasible and operationally reasonable. The Applicant considers that routeing all construction traffic via Thetford would not comply with NPS EN-1. The Applicant will engage with Norfolk County Council to provide updated traffic flow data for Site 1 A47/A140 junction and a summary of the updated collision analysis. While all precautions and preparations are made to avoid damage to existing infrastructure, any accidental damage caused to road surfaces would, in consultation with local highway authorities if deemed appropriate, be reinstated by National Grid.		
Planning Policy	We note that the proposed pylon route, passing through the narrow gap between	Decision making on route alignment in the Waveney Valley area, including Roydon, is set out in Section 4.6 of 5.15 Design Development Report [APP-122] . The Applicant has routed and sited the alignment in accordance with the Holford Rules, as well as taking		

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	Roydon and Bressingham, necessitates a number of sharp turns in contravention of Holford Rule 3. This rule seeks to ensure the very minimal use of the larger angle towers but, in the flat landscape in Roydon, these are even more visually impacting. The Diss and District Neighbourhood Plan (DDNP) was adopted by referendum in 2023, and includes the whole of Roydon parish. The DDNP designates Key Views in Roydon as part of DDNP Policy 16, two of which will be severely affected by the proposed pylon route. These views very much give a feel of place to the locality and, it should be noted, were chosen by the public before the Norwich to Tilbury project was public knowledge. Key View 28 looks all around from the middle of Darrow Lane, just north of Snow Street; the open landscape nature of this view will be devastated by the visual impact of 50m-high pylons. Similarly, Key View 25 looks south from the churchyard of	cognisance of the results of survey information and consultation feedback. The alignment in this area was the preferred alignment to be taken forward for detailed assessment, whilst taking account of all these factors. Effects on visual receptors within Roydon Parish are set out under Visual Receptor Areas (VRA) A9 Shelfanger, A10 Burston, A11 Fen Street and A12 Roydon and Diss in paragraphs 13.4.96 to 13.4.143 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant adverse effects are identified within approximately 1.5 km for VRAs A9, A10 and A11, and within approximately 0.5 km for VRA 12. This includes significant effects on users of PRowS and the Angles Way. As set out in Table A13.1.9 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], recognition of the value of views was determined with reference to a number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan. This was carried through to the judgement of sensitivity in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. Viewpoint 1.15 A1066 High Road, west of Roydon is representative of Viewpoint 25 within the Diss and District Neighbourhood Plan and is therefore considered of regional / local value. The assessment is set out on page 469 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Other viewpoints in [APP-229] which are located within and represent views from Roydon Parish are Viewpoint 1.19: Bressingham Steam Museum (page 479), Viewpoint 1.21: PRow near Roydon Fen (page 484) and Viewpoint 1.22: Doit Lane, near Roydon (page 487). Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRowS). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRowS at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRowS would be closed without a diversion in place, and no severance of the overall network is anticipated. Footpaths 1, 3, 5, 10 and 23 are not expected to be impacted by the Project during construction. During most of the construction period, footpaths 2 and 14 will remain

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	the grade 1 listed St Remigius Church across the Waveney Valley to the south, another open landscape where 50m pylons would completely blight the vista. The setting of the church would itself be seriously compromised by the proximity of pylons. Additionally looking west from Key View 24, from Public Footpath 15, will produce a clear sight of the pylon route. It is to be noted that public footpaths 1, 2, 3, 4, 5, 10, 14 (part of Angles Way) and 23 will all be impacted by temporary closure during construction and the very close proximity of pylons permanently. Additionally, footpaths 8 and 15, will have clear views of the pylons when in place. These footpaths are well used by local people as well as visitors to the area.	accessible on their existing alignment under a managed access regime, rather than being subject to full temporary closure. Where these PRowS intersect with working areas or haul roads, appropriate safety measures will be implemented to allow safe passage for users. This may include gated access of the PRowS or haul road or other appropriate measures, brief holding of users while a specific activity is paused, or directing users around a localised working area where necessary for safety. During a short period of time (two months), these footpaths will be temporarily diverted for a short duration with an increase in journey length less than 500 m. Footpath 4 will be temporarily diverted during the duration of works following a similar alignment as existing. An assessment of the residual effects on delay to users of PRowS within Roydon can be found within in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Where temporary closures with diversions are proposed, an assessment of residual effects on delay is presented within Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that no significant impact of delay to PRow users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. The Applicant has reviewed the assessment of the Church of St Remigius (National Heritage List 1050237) considering the comments provided. Although the rural landscape to the south and south-west of the asset has remained undeveloped, the view from the church to the south through to the west is largely screened by mature tree growth and shrubbery. Furthermore, the hedged and tree-lined boundary of the car park and beer garden of the White Hart Public House adds yet more screening to the west of the asset. From the church at ground level, the views to the Waveney Valley to the south and south-west are largely obscured by the mature vegetation of the churchyard and White Hart grounds. The Project is between 400 m and 520 m to the south of the asset and will only occasionally be glimpsed through the vegetation and it will not distract from the understanding and appreciation of the church as a communal place of worship nor as an example of 12th to 14th century ecclesiastical architecture. Views to the church from the footpath to the south will include overhead lines and pylon RG86 to the south-west, however, as the footpath heads to the east it passes under the wires revealing uninterrupted views north towards the church. The Applicant considers that, whilst not desirable, the Project's interruption of the views across the Waveney Valley to and from

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		the church are appropriately assessed as a permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]).
Health and Wellbeing	Fox Wood Forest School, situated on Snow Street, and developed to support children's mental and physical well-being through connection with nature, will be compromised in the build process and permanently through the pylon's visual impact. Heron Meadow, a Care Farm promoting well-being and learning, off Doit Lane, Roydon will be similarly affected.	The Applicant is a responsible developer who has sought to engage with local communities such as Roydon, to understand potential issues and concerns as they relate to the construction and operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. Potential impacts of the Project on community facilities, which include education and healthcare facilities such as schools and care homes, are assessed in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The chapter also identifies potential mitigation measures where appropriate to reduce negative impacts. A Local Study Area, comprising the Order Limits, has been identified for the assessment of community facilities. Both Fox Wood Forest School and Heron Meadow Care Farm fall outside of this study area and no impacts on either facility are anticipated. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). An assessment of the potential impacts of the Project on health and wellbeing is presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The chapter includes an assessment of impacts as they relate to social infrastructure (such as education and healthcare facilities), focusing on how construction activities may affect public health through changes in accessibility. The assessment refers to 7.3 Outline Construction Traffic Management Plan (Revision B) (CTMP) which identifies different classes of stakeholders that must be considered when designing traffic management measures and provides further detail of factors that must be addressed; these include taking into account particular requirements of, for example, users of social infrastructure facilities such as schools, healthcare settings, care homes

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		and community facilities. As a minimum the CTMP must address factors such as the need to maintain access and egress throughout the construction period. Views from Doit Lane are represented by Landscape and Visual Impact Assessment (LVIA) Viewpoint 1.22: Doit Lane, near Roydon, as set out on pages 487 to 489 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].
Historic Environment	The Diss & District Neighbourhood Plan (DDNP) defined 37 Non-Designated Heritage Assets (NDHA) within its seven parishes which are important to the history of the locality, the character of the neighbourhood and sense of place. The setting and enjoyment of some of these will be spoilt by 50m-high pylons: • Roydon Fen (Track and Environs), NDHA 16. Clear site of pylon line at its western end. • Roydon Church and White Hart, NDHA 27. The vista to the south from this grouping of historic buildings will be entirely blighted by the presence of pylons • The medieval moated site of Bush Hall, NDHA23, lies directly on the proposed pylon route in the bottom of the Waveney Valley	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment in Roydon Parish. The impacts of the Project on Roydon's historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in 7.4 Outline Landscape and Ecological Management Plan (Revision D), 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. The Diss & District Neighbourhood Plan is not included on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS 068] and

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		6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. It was, therefore, not consulted during the assessment. However, as the Church of Saint Remigius and Bush Hall moat are recognised as heritage assets by the Norfolk Historic Environment Record, they have been included in the assessment. The Applicant has reviewed the assessment of the Church of Saint Remigius considering the comments provided by Roydon Parish Council. Although the rural landscape to the south and south-west of the asset has remained undeveloped, the view from the church to the south through to the west is largely screened by mature tree growth and shrubbery. Furthermore, the hedged and tree-lined boundary of the car park and beer garden of the White Hart Public House adds yet more screening to the west of the asset. From the church at ground level the views to the Waveney Valley to the south and south-west are largely obscured by the mature vegetation of the churchyard and White Hart grounds. The Project is between 400 m and 520 m to the south of the asset and will only occasionally be glimpsed through the vegetation and it will not distract from the understanding and appreciation of the church as a communal place of worship nor as an example of 12th to 14th century ecclesiastical architecture. Views to the church from the footpath to the south will include overhead lines and pylon RG86 to the south-west, however, as the footpath heads to the east it passes under the wires revealing uninterrupted views north towards the church. The Applicant considers that, whilst not desirable, the Project's interruption of the views across the Waveney Valley from the southern edge of the church's graveyard does not equate to substantial harm. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. The Applicant has reviewed the assessment of the Bush Hall moat considering the comments provided by Roydon Parish Council. Although located within the Order Limits, the asset is located outside known areas of impact. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment and appropriate measures will be undertaken to ensure the integrity of the asset. The assessment concluded that the

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		Project would result in a permanent moderate adverse significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]), which the Applicant considers to be proportionate and appropriate. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Socio-economics, Recreation and Tourism	The DDNP also designated a number of Local Green Spaces (LGS) to be afforded protection. RPC considers that the setting of Little Green, Snow Street, LGS 31, will be spoilt both	A recreational land assessment has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] . No significant adverse effects have been identified for recreational land located within Roydon Parish Council.

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	during and after construction of the pylons.	
Community Benefits	We consider that residents should not be “bribed” by condescending offers of so-called community benefits by way of compensation. Such minimal benefits do not compensate for the huge, permanent damage that 50m pylons will do to our residents’ quality of life and the environment, let alone the significant reduction in property values.	The government has published guidance on Community Funds for Transmission Infrastructure ⁷⁶ . In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure Guidance.
Health and Wellbeing	We are also concerned by the evidence suggesting an association between proximity to power lines and childhood leukaemia. Emeritus Professor [REDACTED] in the school of Chemistry at Bristol university is a member of the coordinating committee of the Government Stakeholder Advisory Group for EMF (SAGE). He is a member also of the Human Radiation Effects Group funded by the charity Children with Leukaemia to research the possible environmental causes	Research into the potential health effects of electric and magnetic fields (EMFs) has been carried out for decades and National Grid look to independent authoritative review bodies such as the UK Health Security Agency to review that science and for government to advise on appropriate protective measures based on the outcomes of these reviews. Summaries of the scientific evidence and review body outcomes are provided in Section 2.6 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330] . These review processes consider the totality of the scientific evidence, rather than being based on selected individual studies, though all relevant individual studies are taken into account. These reviews include research covering, but not limited to, melatonin, corona ions, adult cancers, fertility and childhood cancers. It is important to note that after decades of research into EMFs and health, no health effects have been established below the government’s adopted exposure limits. The UK has undertaken its own review of what precautionary measures should be applied to electricity infrastructure considering uncertainty in science, including evidence on childhood leukaemia. In 2009, the outcomes of the Department of Health’s established

⁷⁶ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

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	of childhood leukaemia with the emphasis on non-ionising radiation. Currently, evidence suggest that power frequency magnetic fields suppress the production of the hormone melatonin, a natural anti-cancer agent secreted by the pineal gland, which may explain the adverse health effects associated with magnetic field exposure, as experienced in proximity to high voltage power lines. Power lines also emit corona ions which may also explain the apparent increase in the risk of childhood leukaemia within 600 meters of such lines. Further studies by the Oncology department of Bristol University support this view. Whilst appreciating such associations are not conclusively proven, nevertheless RPC, and local residents, are deeply concerned by such risks and the council considers, therefore, that the presence of such power lines present an unacceptable level of possible risk to human health, and something not to be gambled with.	Stakeholder Advisory Group to Government on Extremely Low Frequency Electric and magnetic fields (SAGE) were published. The aim of the process was to bring together a range of stakeholders which included Professor Henshaw, to identify and explore the implications for a precautionary approach to Extremely Low Frequency EMFs and make practical recommendations for precautionary measures. SAGE looked at a range of precautionary measures and made recommendations to government on those which should be adopted. The government adopted several of the recommendations SAGE had made for precautionary measures. Those measures specific to high voltage power lines include 'optimal phasing' of power lines and providing more advice on EMFs. Other precautionary measures, specifically the introduction of corridors around new and existing overhead lines, were considered but were judged to be disproportionate in light of the scientific evidence and were not adopted. Based on the science and recommendations by SAGE, the UK has a carefully thought-out set of policies for protecting against EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. We believe it is right that the decision on what is, and is not acceptable, is made independently of National Grid by authoritative review bodies, rather than our own assessment of the science. All these review bodies, including UK Health Security Agency which specifically advises the government, would be able to revise their conclusions if new scientific results justified so doing. The fact that they have not done so indicates that no new studies have been published that significantly change the conclusions already reached. The evidence concerning compliance with these policies, including the numerical guidelines and precautionary policies is included in 7.8 Electric and Magnetic Field Compliance Report [APP-330].

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Need Case	We appreciate that the UK needs more energy security, and from sustainable resources. However, this should not at the expense of our landscapes, environment and health. Quality of life for current and future residents and visitors to our area must be considered alongside the bare financial cost of build. This project will directly and mostly benefit London and the south-east of England whilst East Anglia is left permanently scarred by it. We urge the Planning Inspectorate and the Government to reject the plan as it stands.	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the electricity that will be generated and connected to the electricity transmission network by 2030, while working to the required standards. The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. Enabling the connection of new sources of renewable energy and contributing to our energy security in the future would help the country to achieve the government's Net Zero target and ensure that the National Grid meets future power demands.

2.48 Sir Bernard Jenkin MP

Table 2.48 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Sir Bernard Jenkin MP [RR-3408]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.48 Comments and National Grid’s response

Topic	Comment	National Grid’s response
N/A	Norwich to Tilbury: Have Your Say Sir Bernard Jenkin MP 27th November 2025 Submission to Planning Inspectorate Sir Bernard Jenkin is MP for Harwich and North Essex. This submission is made on behalf of his constituents. This constituency includes the parts of Norwich to Tilbury proposal from the Essex/ Suffolk border (in the middle of the Dedham Special Landscape Area). It affects the villages and communities of: • Dedham • Stratford St Mary • Langham • Ardleigh • Little Bromley • Great Horkesley • Aldham • Great Tey • Fordham • Wormingford	Noted

Topic	Comment	National Grid's response
Landscape and visual	As proposed the Norwich to Tilbury project (N2T) would have a dramatic impact upon, and cause great harm to, the Dedham Vale Special Landscape Area (SLA) and its setting. Pylons and industrial infrastructure will be visible across substantial parts of the Vale. All major access routes from the south will pass beneath overhead lines [...] Villages along the southern boundary of the Dedham Vale currently enjoy uninterrupted historic views towards the Vale and this will be dominated by pylons. Views from the Dedham Vale of these properties will be much more dramatically impacted [...]The Dedham Vale and its setting enjoy protection in planning policy (in particular derived from NPS EN-5) and in Law (derived from section 85 of the Countryside and Rights of Way Act 2000 and section 245 of the Levelling Up and Regeneration Act 2023). The Norwich to Tilbury proposals fail to meet the	The Applicant does not consider that the proposals would cause great harm to the Dedham Vale nor that properties have a right to views and consider the proposals to be acceptable in policy terms. Indeed EN5 makes specific provision to change the strong presumption of overhead line to underground cable in nationally designated landscapes. The Project has been designed to minimise effects on Dedham Vale National Landscape (DVNL). This included undergrounding within DVNL and parts of its setting, with the closest above-ground infrastructure being approximately 1.3 km from the DVNL boundary. The setting of DVNL to the south is identified in Figure A13.5.5 in Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The purpose of a National Landscape is to 'conserve and enhance natural beauty', as set out in the Countryside and Rights of Way Act 2000. The Special Qualities of DVNL explain the aspects of natural beauty which are important for this nationally protected landscape. The assessment of effects on the Special Qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in paragraph 13.2.42 in 13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. Short to medium-term significant effects on the Special Qualities of the National Landscape are identified during construction. This is as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. Once the Project is operational and the land has been restored, effects on the Special Qualities of the National Landscape would not be significant. Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 (2024) require consideration of the effects (using the term 'harm') on a National Landscape. These are both the direct effects (i.e. physical effects on the designated area) and the indirect arising from infrastructure proposed outside the designated area. 'Harm' is not reported on in a Landscape and Visual Impact Assessment (LVIA), the purpose of which is to identify effects in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), as part of the Environmental Impact Assessment (EIA) process, but it is considered in the planning balance, given use of the term in the policy above.

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	requirements set out therein and are therefore not capable of approval by the Secretary of State.	When considering effects on Special Qualities, the long-term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute 'harm' to these Special Qualities. There will be some significant visual effects on views looking outwards from the edge of the DVNL, where some of the proposed pylons would be visible. Such views (from the edge of the National Landscape) do not form part of the identified Special Qualities of DVNL. Effects on the <i>"Surprisingly long distance views from higher ground along the valley in an area associated with large skies"</i> which is identified as a Special Quality would not be significant at operation, as set out in Table A13.1.3 of 13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The fact that the Project will be visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant (and so will not constitute 'harm'). Note that, in terms of indirect effects, the potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End compounds to the north of Raydon airfield and at Great Horkesley. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has sought to be fulfilled as set out in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].
Cumulative effects	As proposed the Norwich to Tilbury project (N2T) would have a dramatic impact upon, and cause great harm to, the Dedham Vale Special Landscape Area (SLA) and its setting. Pylons and industrial infrastructure will be visible across substantial parts of the Vale. All major access routes from the south will pass	Inter-project cumulative effects with Five Estuaries and North Falls are considered in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as this planning application is still in early stages. However, this has been added to the post-April 2025 list as the construction of the proposed development and the Project may overlap. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination. In addition, the Tarchon Interconnector project will be required to undertake its own

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	beneath overhead lines. The cumulative impact of the East Anglian Connection Node (EACN) together with the associated electricity infrastructure projects (North Falls and Five Estuaries wind turbines, and the Tarchon interconnector) has a particularly devastating effect on Ardleigh and Little Bromley. These two ancient settlements will be dominated by new pylons and new substations, irreparably changing their rural character.	cumulative assessment with other developments as part of its respective development consent application.
Landscape and Visual	The Colne Valley, which Colchester City Council highlight to be a landscape of exceptional quality and value will irreparably harmed.	The Colne Valley is not nationally designated and the Applicant's position is that tests under NPS EN5 para 2.9.23 are not engaged and the strong starting presumption for overhead line remains consistent with policy. Judgements on landscape value are reported in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. Value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing landscape value outside national designations. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (Landscape Institute's Technical Guidance Note (TGN) 02/21 page 3). In the context of all the landscapes considered in the LVIA, the relative value of the Colne Valley River Slopes (LCA A5) and Colne River Valley Floor (LCA A4) is judged to be medium-high. The basis for these judgements is contained within Tables A29 and A30 in Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228].

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		Effects on visual receptors within the Colne Valley are set out under Visual Receptor Areas (VRA) D5, D6 and D7, in paragraphs 13.7.52 to 13.7.87 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] . Effects on landscape receptors within the Colne Valley are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under LCA A4 Colne River Valley Floor and LCA A5 Colne River Valley Slopes in paragraphs 13.3.543 to 13.3.572. Effects on landscape and visual receptors are assessed as significant up to approximately 1.5 km from the Project.
Planning Policy	If National Grid persist with these plans, then they will be met with Judicial Review which will cause significant and expensive delay, contrary to the national interest.	Should the Secretary of State (SoS) grant development consent then the Applicant is aware that certain third parties may decide to try to challenge that decision by way of judicial review. The mere right of a party to seek a judicial review is not in and of itself a sign that the decision to be reviewed (one which has not yet been made) contains any legal errors. Any potential claimant would need to secure permission from the court to bring an application for judicial review, commonly known as the 'permission stage' at which point the court would consider the merits of the claim against the relevant legal tests. It is up to the court to consider the application and determine whether the claim should be heard. The threat of a judicial review at this stage should not simply determine the outcome of the proposed Project, nor does the threat mean the Project design selection process was flawed or the outcome incorrect.
Alternatives	The Planning Inspectorate must require significant change to these proposals and in particular rerouting entirely away from the Dedham Vale or alternatively full undergrounding of all infrastructure and the removal of even residual impact from it.	The Applicant acknowledges the comment directed at the Planning Inspectorate. The Applicant has set out how the Project complies with relevant planning policy in the 5.6 Planning Statement [APP-085] , and the clear and compelling case for development consent to be granted.
Alternatives	Failure Properly to Consider Alternatives The current Norwich to Tilbury (N2T) proposals will cause severe and irreversible harm to	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. ES chapter 3 Alternatives from para graph 3.5.34 sets out the consideration from the early stages of the Project of routes around the Dedham Vale and the reasons why these were not

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	nationally protected landscapes, local communities, and the environment. National Grid have acknowledged that the level of damage is significant, yet they have not followed the requirements set out in National Policy in order to avoid that harm. NPS EN-5 at section 2.9.17 sets out a requirement to “avoid altogether, if possible, the major areas of highest amenity value by so planning the general route of the line in the first place, even if the total mileage is somewhat increased in consequence”. It further clarifies that National Landscapes and Areas of Outstanding National Beauty are such areas of “highest amenity value”. This requirement is strong. Put simply, if an alternative route exists which avoids harm to a National Landscape, then National Grid are required to adopt it in preference. National Grid themselves admit in their ‘Strategic Options Backcheck and Review, 2024’	taken forwards. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360). In regards to EAS1, the various SOBRs have set out why this option was not progressed. This is because whilst it facilitates resolution of the boundary reinforcement aspect of the need case, it does not facilitate the connection of the windfarms and interconnectors (North Falls, Five Estuaries and Tarchon). To address this, to make the solutions comparable, adds an estimated £500m which is significantly greater than the differential between the EAS1 and EAS2 (the option progressed).

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	that one such overhead line route exists: EAS1. They conclude that it is viable in electrical and engineering terms and, save for the fact that they had already commenced plans in respect of their Norwich to Tilbury route, it would have been cheaper. Avoiding the Dedham Vale entirely, EAS1 is compliant with the requirements of NPS EN-5. NESO have also independently considered the question. The East Anglia Network Study (EANS), published by ESO in March 2024, modelled many alternatives to N2T which should have been considered before NG embarked in the process of consultation. EANS was only necessary because National Grid had failed to do explore these alternative options.	
Alternatives	EANS came up with viable alternatives: in particular, an underground HVDC alternative (Option 8). At a meeting attended by ESO (now NESO) in Parliament on 22 January 2024 (Committee Room 7), where MPs were informed that	The Applicant has previously responded to these other suggestions and disagrees with the conclusions drawn. As set out in our response to Written Representations, the use of HVDC does not achieve the savings reported and is not preferred, see also the response below for further detail. Given the Applicant's regulatory and contractual duties, the Project as presented remains preferred. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the

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	the EANS would contain “6 options” that were “viable” and which would be “assessed against the four benchmarks”. ESO described what would emerge as Option 8 in EANS, removing the need for EACN, and this would be “their preferred option.” This option: • Replaced the proposed HVAC overhead pylon route with underground HVDC. • Enabled North Falls and Five Estuaries to connect to the grid via Sealink between Sizewell and Richborough (Kent). This removed the need for the East Anglia Connection Node (EACN) entirely and hence the need for a cable route through the Dedham Vale. It was therefore compliant with NPS EN-5. • Was forecast to cost only £1 billion more than N2T, plus £1 billion for delay.	government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant’s connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant’s position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN1 (2024) and NPS EN5 there were alternatives considered that would avoid routeing through the National Landscape.

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Alternatives	After the 2024 general election of the new government, all consideration of alternatives (including Option 8) were aborted for political reasons. This overrode indications which had been given to MPs that Option 8 might well have become the alternative preferred by ESO. Since then, NESO's Clean Power 2030 report (published in December 2024) has further strengthened the case for underground HVDC. NESO concluded that, despite higher upfront capital costs, an underground HVDC approach would still be significantly cheaper than a single year of delay to the pylon-based N2T, which NESO estimates costs £4.2 billion per year. NESO now anticipates that the pylon proposal will be delayed by at least one year due to the scale of public opposition and credible threats of judicial review. These findings fundamentally undermine the claim that overhead pylons are the quicker or cheaper route.	National Grid considered alternatives in the 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). If the same flexibility is to be achieved as the Applicant's proposal with a three ended connection from Norwich to Bramford to Tilbury, then as stated in paragraph 14.4.6 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357]: 'There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.

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Alternatives	At the time of the launch of Clean Power 2030, the CEO of NESO underlined the importance of carrying public consent in order to achieve the timetable. The Government and National Grid have ignored this advice. Concerns about environmental effects from undergrounding are often raised by National Grid, yet landowners and local campaign groups along the proposed route consistently prefer underground and in particular underground HVDC. Landowners have had positive recent experience with underground infrastructure, including major water mains installation in the same area of my constituency. I have received no objections whatsoever to this undergrounding project. Where underground HVDC has been proposed previously, such as in the Western Link, opposition has been limited.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Planning policy	National Grid's refusal to adopt either EAS1 or Alternative 8 from EANS means their current preferred route is not capable	In regards to EAS1, the various SOBRs have set out why this option was not progressed. This is because whilst it facilitates resolution of the boundary reinforcement aspect of the need case, it does not facilitate the connection of the windfarms and interconnectors (North Falls, Five Estuaries and Tarchon). To address this, to make the solutions

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	of approval. A protected landscape cannot be treated as an expendable convenience. The only reason National Grid give for rejecting EAS1 is that they had already started planning work on their chosen route and believe altering it now would cause delay and add cost. This is not a lawful planning argument. Incompetence or premature design work cannot be used to override National Planning Policy or the statutory protections afforded to a National Landscape.	comparable, adds an estimated £500m which is significantly greater than the differential between the EAS1 and EAS2 (the option progressed).
Consultation	National Grids refusal even to consult on any of these routes demonstrates that the consultations in respect of Norwich to Tilbury were deficient regarding the Gunning Principles: no informed consultation has occurred in respect of meaningful alternatives. This renders the consultations invalid and further renders these proposals incapable of approval.	The Applicant has complied with the requirements for a project of this nature and maintains that it would be disingenuous to consult on options that do not meet its regulatory requirements and would not progress. This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007]

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Planning policy	Furthermore, even if one sets aside the obligation to use an alternative route where one exists, N2T still fails both NPS EN-5 and the Levelling Up and Regeneration Act. If any part of the route were to approach the Dedham Vale, the proposals must: (1) enhance the Dedham Vale and further its statutory objectives and (2) remove even residual impact because it is unacceptable in planning terms. National Grids' proposals meet neither test.	Please refer to response in row 2 of this table regarding the overall policy position on the DVNL.
Alternatives	EAS1 remains the only policy-compliant alternative that avoids these failures, yet it has never been properly considered or consulted upon, though the EANS Option underground HVDC alternative is also significantly less harmful.	Whilst noting the respondent's preference for the EAS1 option, the reasons why this was not taken forward were stated in the 2023 Strategic Options Backcheck and Review [APP-357]. Specifically, paragraph 15.4.6 onwards note the limitations in meeting the overall reinforcement requirement and the additional costs to extend the customer connections further inland concluding at paragraph 15.4.10 that, 'EAS1 was less optimal from a technical perspective and additional costs.....would make the overall cost impact of the option less favourable.....'. Those reasons remain valid, and no change is proposed.
Landscape and Visual	Environmental and Landscape Harm in the Dedham Vale National Landscape The Dedham Vale SLA and the Colne Valley are among England's most valued landscapes, recognised for	Please refer to response in row 2 of this table regarding the overall policy position on the DVNL.

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	their cultural, ecological and historic importance.	
Land use	N2T will remove more than 10 km of hedgerows and turn over 500 acres of high-quality farmland into a construction zone for at least three years	The Applicant does not recognise the figures stated in this comment for hedgerow loss within the Dedham Vale National Landscape. The actual habitat impacts will be significantly lower, with <1km of hedgerow removal proposed within the Dedham Vale National Landscape. Full details of the vegetation impacts are included within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. It should be noted that these assessments are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to hedgerows will be minimised as far as practicable. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats, including hedgerows, where practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent), as agreed with Natural England and Local Planning Authorities. On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting has been proposed within Environmental Areas surrounding the permanent National Grid asset. Illustrative landscape designs for these areas have been provided within 7.4 Outline Landscape and Ecological Management Plan (Revision D). In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural

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		Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade across the Project, which in this area comprises a mix of Grade 2 and Grade 3a, with limited extents of Grade 1 and Grade 3b land). National Grid has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routing and siting process confirms that no reasonable alternatives are available. Policy recognises that opportunities to fully mitigate impacts on existing land uses may be limited. Even so, impacts on land use and farming operations have been carefully considered and reduced as far as practicable.
Landscape and Visual	This will cause substantial damage to the Dedham Vale National Landscape. If the new proposals proceed unchanged, the Vale will be entirely encircled by pylons, with every major access route passing beneath high-voltage lines. Even if the line through the Vale were removed, the surrounding infrastructure would still dominate the landscape and views from within. National Grid have been extremely sparing of and selective with their choice of viewpoints resulting in an understated impression of the harm caused. Colchester City Council have made representations in respect of viewpoints – as highlighted in	Please refer to response in row 2 of this table regarding effects on the DVNL. With regards to ‘encirclement’, perceptions of being encircled / surrounded when viewing the Project on maps are very different from the actual local context. Nonetheless, the Applicant recognises that people will pass underneath the Project on approach to DVNL from the south. Effects on users of roads and PRow are considered as part of the assessment within Visual Receptor Areas (VRAs), set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with relevant Local Planning Authorities, including Colchester City Council, as set out in the relevant Statements of Common Ground (5.9.1 – 5.9.12 [APP-089 to APP-100]). The Landscape and Visual Impact Assessment (LVIA) viewpoints are a representative selection of publicly accessible locations along the Project route, capturing a range of receptors and a variety of distances and viewing directions. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in 7.12 Visualisations [APP-343 to APP-351]. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]. The number of viewpoints assessed in the LVIA (206) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are

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	the 'Statement of Common Ground' – which have been ignored.	a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are also presented in the 7.12 Visualisations [APP-343 to APP-351] . It is important to note that the LVIA is based on first hand observations during site visits and not on viewpoints and visualisations alone.
Alternatives	Great Horkesley Area The proposed sealing-end compound at Horkesley Plantation would introduce multiple pylons and gantries close to the Dedham Vale and to a dense cluster of listed buildings in the School Lane and Old House Road area. The flat topography offers no natural screening, making the structures widely visible across the Vale.	The Applicant notes the concerns raised regarding the location of the CSE compounds to the south of DVNL and confirms that alternative positioning has been considered. The Applicant does not consider alternative locations preferred for the reasons set out in Section 7.2 of 5.15 Design Development Report [APP-122] .
Noise and Vibration	Many nearby listed buildings have minimal foundations and are particularly vulnerable to construction vibration.	An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] . The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers reasonable worst-case construction methodologies and does not take account of potential mitigation. This is so that potential 'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or

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		potential structural damage, can be avoided with the use of best practicable means (BPM). This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post- condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Transport and Traffic	The proximity of the compound to the Essex Way would also harm recreational amenity for large numbers of walkers.	The Essex Way runs along the north side of the Great Horkesley (EACN side) CSE compound. Visual effects on users of the Essex Way are set out in paragraphs 13.12.84 to 13.12.121 in 13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. As noted in paragraph 13.12.116, <i>“To the east of Great Horkesley there would be close views of Great Horkesley (EACN side) CSE compound and proposed pylons. Proposed mitigation planting within the Environmental Area around Great Horkesley (EACN side) CSE compound would be immature at this stage and would not screen or filter views towards the CSE compound or proposed overhead line.”</i> As set out on page 6 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231], at Viewpoint 4.03: Broad Lane / Essex Way, east of Great Horkesley there would be a moderate and significant (adverse) effect at Operation Year 1. This would reduce to minor and not significant (adverse) at Operation Year 15 once proposed mitigation planting around the CSE compound reaches semi-maturity.

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Landscape and visual	Little Horkesley Area The proposed compound at Little Horkesley sits on high, visually prominent ground, making pylons visible across the western Dedham Vale. National Grid had previously identified a feasible lower-lying alternative that would have avoided these effects with minimal route alteration. The current choice threatens protected views both into and out of the Vale. It would also be clearly visible from several listed medieval halls and farm houses including The Grove, Gladwins Farm, Maltings Farmhouse and others whose historic rural settings and long-established landscape views are integral to their heritage value.	The Applicant notes the concerns raised regarding the location of the CSE compounds to the south of DVNL and confirms that alternative positioning has been considered. The Applicant does not consider alternative locations preferred for the reasons set out in Section 7.2 of 5.15 Design Development Report [APP-122].
Historic Environment	West Bergholt and Fordham Area In the Colne Valley, several listed farmhouses (including Highfield Farm and Kings Farmhouse) would experience major harm to their settings, with an angle tower positioned directly opposite Kings Farmhouse's driveway. Coney Byes Farm and Fordham Place, located high	The Applicant has reviewed the assessment of St Mary's Church (1225120), All Saints Church (1239789), Highfield Farm (1225094), Coney Byes Farm (1225071), The Hall (1266531), Kings Farmhouse (1266530) and Fordham Place (1222602) in light of the respondent's comments. The Applicant agrees that the setting of Highfield Farm, Kings Farmhouse, Coney Byes Farm and Fordham Place does extend to the Order Limit and as for The Hall if its setting does not extend to the Order Limit, the Project may become more visible during the defoliation period. However, the Applicant has concluded that the setting of the two churches does not extend to the Order Limits due to vegetation around them and topography.

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	on the valley sides, have wide, uninterrupted views and no natural landscape screening; pylons anywhere within the valley would damage these heritage settings. The cumulative effect across the valley would be severe and irreversible. Significant impacts would also fall on Old St Mary's Church (Grade I) and The Hall (Grade II*) in West Bergholt, both highly visible on the valley ridge. Hill House Woods a well-used and regionally valued walking area would lose much of its natural tranquillity. On the opposite side of the valley, the Grade I Church of All Saints, Fordham, would be similarly affected. Colchester City Council highlight that this landscape is of exceptional value.	As stated in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], Assets where settings do not extend to the Order Limits such as The Hall, St Mary's Church and Church of All Saints, are not included in the baseline or assessment in this chapter, as there would be no potential for effects resulting from the Project. These assets are described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The setting of Highfield Farm, Kings Farmhouse, Coney Byes Farm and Fordham Place, has been thoroughly assessed by the Applicant. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Therefore, the Applicant disagrees with the major harm. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. While the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering Critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP Infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph

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		4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. Therefore, the Applicant is confident that its conclusions for these assets are proportionate and appropriate.
Good design	This area must be avoided entirely and an entirely different route selected, unless it is all HVDC undergrounded. In practical terms, if the route must come via the Dedham Vale, the proposed pylons between Ardleigh (TB1) and Great Horkesley (TB34) must be removed and the Sealing End Compound at Little Horkesley (TB35/36) must be relocated further south, away from the Dedham Vale and beyond the Colne Valley. The sacrifice of Dedham Vale and the Colne Valley for political expediency or short-term cost considerations cannot be justified under planning law. The statutory duty is clear, to protect and enhance our most important landscapes, not diminish them. Ardleigh and Little Bromley area The proposed pylons to connect to the East Anglian Connection Node will be visible	The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of 5.15 Design Development Report [APP-122] which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Restrictions are also found at the crossing of the A12 where other developments do not leave enough space for the necessary construction width. Whilst conceptually this connection could in part be installed as cable, as set out in 5.15 Design Development Report [APP-122] the Applicant's position is this is not justified. Please refer to response in row 2 of this table regarding the overall policy position on the DVNL.

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	from parts of the SLA and cannot be justified. The impact on Ardleigh and Little Bromley cannot therefore be justified under planning law.	
Alternatives	A fully underground HVDC solution for N2T (Option 8 of EANS) would significantly reduce the environmental footprint of the N2T project and make passage via the Dedham Vale more acceptable. The present underground AC proposal requires a working corridor averaging 120 metres in width, with some areas extending to 500 metres. By contrast, HVDC systems typically require a corridor of approximately 60 metres. This narrower trenching would be far less intrusive, avoid large-scale tree felling, and reduce residual archaeological and ecological damage. It is highly significant that the project to install the underground Anglia pipe through the same area has provoked no objections whatsoever. Option 8 of EANS	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The needs case in Section 3 'Needs Case' Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP355] clearly states the existing system capabilities and the amount of energy that is expected to transfer across system boundaries. There are limitations as to what a circuit can carry, and these are defined by the International Electrotechnical Commission, who set ratings for 420 kV transmission, of 5,000 amperes being the highest available equipment. This equates to: • A capacity on a single circuit of 3,465 MVA (megavolt-ampere) • A double circuit of 6,930 MVA • And where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA. The current post-fault capacities are:

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	also removes the need for EACN at Ardleigh/Little Bromley.	• EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW. Option 8, page 42, within the Electricity System Operator (ESO) East Anglia Network Study, (ESO – Now is the National Energy System Operator (NESO)), Evaluates an option with 2 x 2GW HVDC Links starting in Norwich and a 2GW Link starting from Friston. As shown above EC5 which is the boundary which is the boundary between Norwich in Bramford requires ability to manage capacities greater the 6GW in the near term. Therefore, an option where all HVDC connections do not start at Norwich would not meet this need. Therefore Option 8 does not meet the need. The applicant has undertaken an appraisal of an option set out, Section 14 ‘Offshore 1 – Norwich to Tilbury’ pages 101-108. 7.17 Strategic Options Backcheck and Review [APP355]. This option looked at a 3 sets Of 2GW (6GW) links from Norwich to Tilbury substation as a less optimal solution that does not connect Bramford or generation at a capital cost of £4,096.50m The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 of [APP-357] states: <i>"Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m)</i> Therefore, the equivalent to the applicant proposal would be Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m (£5.3bn). Compared to the

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		(ESO) NESO option 8 which does not meet the needs case on EC5N boundary of £4.9bn. The applicant has also undertaken recent work to show that the cost of HVDC cabling has lower cost in marine environments where a cable laying vessel can carry up to 100kms of HVDC cable in one operation. Compared to onshore HVDC undergrounding where circa 1km of cable can be delivered via road transport at a time. This leads to costs being 1.6 times higher for HVDC land installation than the offshore alternatives set out by the Applicant and not considered in the NESO report. Therefore, Applicant has shown the lowest cost alternative that meets the needs case set out Section 3 'Needs Case' Table 3.3, page 31 of the 7.17 Strategic Options Backcheck and Review [APP355]. That is the option most equivalent to NESO option 8, but meets the need.
Consultation	Delays that will be caused by Judicial Reviews As it stands, the N2T project will continue to face intense opposition from well-funded and professionally advised campaign groups, which are preparing applications for more than one judicial review based on 1. National Grid's failure to consider alternatives as part of their consultation process; and 2. damage to the protected National Landscape. Estimates for cost due to delay run in excess of £4 billion per year. Even if these figures for delay costs are revised or	Should the Secretary of State (SoS) grant development consent then the Applicant is aware that certain third parties may decide to try and challenge that decision by way of judicial review. The mere right of a party to seek a judicial review is not in and of itself a sign that the decision to be reviewed (one which has not yet been made) contains any legal errors. Any potential claimant would need to secure permission from the court to bring an application for judicial review, commonly known as the 'permission stage' at which point the court would consider the merits of the claim against the relevant legal tests. It is up to the court to consider the application and determine whether the claim should be heard. The threat of a judicial review at this stage should not simply determine the outcome of the proposed Project.

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	superseded, this does not devalue this fundamental argument. An underground HVDC solution could deliver the N2T capacity both more quickly and more cost-effectively than the proposed pylon-based N2T due to less community resistance whatever route was ultimately selected.	
Planning policy	The recent threat of judicial review in the Dedham Vale area has set a significant precedent directly relevant to the N2T proposals. The Dedham Vale Society was seeking a judicial review of the construction of the Station Car Park at Manningtree Station (in the very edge of the Dedham SLA). Before the matter came to Court, The Secretary of State (DEFRA) conceded the principle of the case, and confirmed that legislation that allows development within a National Landscape must be applied together with the statutory requirement that such development may only be approved where it enhances the protected landscape. This duty comes from section 85 of	The Applicant's understanding (noting there is no judgement available as the Secretary of State consented to judgement) is that the Manningtree Station judicial review concerned a car park extension at Manningtree Railway Station, which is located within the Dedham Vale National Landscape. The judicial review challenge related to a Screening Direction issued by the Secretary of State which concluded that the development did not require an Environmental Impact Assessment. The government conceded and accepted that it had erred in law by failing to apply the statutory duty introduced by section 245 of the Levelling-up and Regeneration Act 2023 (LURA) which places a duty on relevant authorities, who must now seek to further the statutory purpose of protected landscapes. The Screening Direction was quashed. The judicial review related to the application of the duty introduced by section 245 of the LURA and emphasises the importance of the strengthened duty to decision makers. The Applicant has considered and applied the duty, and has proactively engaged with the National Landscape Partnership, relevant Local Authorities and Natural England on this matter and set out how the duty has been sought to be met in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The details of the Manningtree Station case are therefore of limited relevance to the Application given the Applicant has clearly considered and applied the duty. The Applicant has also considered other relevant case law in relation to the duty as set out in Section 2.2 of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].

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	the Countryside and Rights of Way Act 2000, which now requires that developers must conserve and enhance National Landscapes; merely “having regard” to the landscape is no longer sufficient. Importantly, this requirement cannot be overridden by other legislative provisions and Government has further confirmed this by inserting similar terms into more recent drafts of NPS EN-1 and NPS EN-5. This is also incorporated into section 245 of the Levelling Up and Regeneration Act 2023. The legal principle underpinning this case means that National Grid is now required to: 1. Remove all components of the Norwich to Tilbury proposal that would damage the SLA, including the entire pylon route along the southern boundary through North Colchester, and the destructive effects of HVAC undergrounding through the SLA.	The Applicant recognises its duty to seek to further the purposes of the Dedham Vale National Landscape. The Applicant is aware this duty was introduced in 2023 and strengthens the previous version of section 85 of the CRow Act which required relevant authorities to “have regard” to the statutory purpose of National Landscapes. The section 85 duty does not prohibit development or activities within the National Landscapes, nor indeed does it prohibit development that causes harm to a National Landscape. The core legal framework for decision making on a development consent application remains section 104 of the Planning Act 2008 (we do not repeat this here but refer to the Planning Statement [APP-085] for further details on the core decision making framework applicable to the Application). The Defra guidance (Defra, 2024) states the duty ‘Does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities’. It remains the case that decision makers can make decisions that impact designated landscapes, but they are required to show that they have taken steps to seek to further the purpose of conserving and enhancing natural beauty. Case law clearly supports this interpretation of how the duty operates, in a recent judgment (Campaign for the Protection of Rural England (CPRE) v Secretary of State for HCLG [2025]), the High Court confirmed that the duty does not require a refusal of planning permission where there is harm to the National Landscape. Mr Justice Mould confirmed ‘<i>The language of section 85(A1) of the 2000 Act imposes no prohibition on the grant of planning permission for development which fails to conserve and enhance the natural beauty of a protected landscape</i>’. He rejected the claimant’s construction of the duty which would oblige a planning authority to refuse permission whenever any harm was found ([52]). This “<i>would result in a radical shift in the planning authority’s performance of its statutory functions...replacing an essentially evaluative determination with a single determinative factor</i>” ([58]) – a change that was not properly borne by the language of the strengthened duty (cf. regulations 63 and 64 of the Conservation of the Habitats and Species Regulations 2017, discussed at [61]-[62]) Whilst this judgment is related to decision making under the Town and Country Planning Act 1990, the principles in relation to the seek to further duty are applicable for decision making under the Planning Act 2008.

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	2. Clearly outline measures to actively enhance the SLA, as required by law. The Secretary of State has no legal basis to approve the proposals in my constituency of Harwich and North Essex in their current form otherwise.	NPS EN-5 (2024) was adopted after the strengthened duty came into force and provides a clear direction as to the form infrastructure should take in paragraph 2.9.20 which states, '<i>Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)</i>'. Paragraph 2.9.22 goes on to state '<i>Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape</i>'. This paragraph again recognises there is no prohibition to development within the National Landscape, indeed it is expressly addressing the scenario where electricity infrastructure development will take place in the National Landscape. The developer's discharge of the duty to seek to further the purposes is to be considered in that context and the case law relating to the duty. Details on how the Applicant has sought to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the CRoW Act is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Project has been sited and designed to reduce the potential for adverse effects on the Dedham Vale National Landscape designation and alterations of its special qualities, as far as practicable. Project cables will be laid underground within the National Landscape and its setting, where there is potential for significant effects on the designation in accordance with national policy (paragraph 2.9.20 NPS EN-5 (2024)). The National Landscape Assessment Study describes the effects of the Project on the Dedham Vale National Landscape during construction and operation (APP-235). In addition to taking the National Landscape into consideration through all stages of the Project design, in line with the Defra guidance additional '<i>appropriate, reasonable and proportionate steps</i>' are proposed in respect of the duty to seek to further the statutory purpose of the National Landscape. The additional measures have been identified in collaboration with the National Landscape Partnership and following engagement with the relevant Local Authorities. The additional measures include: • A financial contribution in the form of the Dedham Vale National Landscape Fund

Topic	Comment	National Grid's response
		Undertaking/commissioning an initial feasibility study into the potential future removal of an existing UK Power Networks 132 kV overhead line (known as the PJ Line). The Dedham Vale National Landscape Fund will be utilised by the National Landscape Partnership to deliver benefits and provide enhancements to further the statutory purpose of the National Landscape. A potential list of projects has been created and provided within Annex A of 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant considers the approach taken to the Project and measures identified meet the requirements of section 85(1) of the CROW Act, and are appropriate, reasonable and proportionate in accordance with NPS EN-1 (2024) and the Defra guidance. This approach is also consistent with other DCO decisions in respect of the section 85 duty including Lower Thames Crossing and Rampion 2 Offshore Wind Farm.
Planning policy	National Grid's approach fails to satisfy the requirements of section 2.9.12 in the NPS EN-5, which explicitly states that even residual damage to protected landscapes is unlikely to be acceptable. This means that merely reducing harm is insufficient. National Grid must eliminate the damage to the SLA and Colne Valley. In addition, the law requires that any proposal must actively improve the SLA, a strict and absolute legal test that applies specifically within designated areas. National Grid cannot seek to bypass this requirement by arguing that	The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the National Policy Statement (NPS) EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects. Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides '... 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'. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5.

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	there is an overall benefit elsewhere.	The residual environmental effects fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
N/A	In summary: 1. These proposals are incapable of approval and must be rerouted entirely in order to satisfy policy and Law 2. Even if for some reason they are not rerouted, then significantly greater use of undergrounding is necessary in the vicinity of the Dedham Vale and to a point beyond the Colne Valley 3. Use of underground HVDC technology would be less vulnerable to judicial review. While an underground proposal could still face challenge, it would be far less likely to attract well-funded or successful litigation. In contrast, the current pylon proposal is almost certain to face multiple judicial reviews, particularly on the grounds that National	The summary and conclusions of the RR are noted and the specific points made are responded to above in this table.

Topic	Comment	National Grid's response
	Grid failed to consider viable alternatives during its consultation process. This ongoing legal exposure risks years of delay and escalating costs.	
	MPs have pressed the Government to reassess its position on HVDC undergrounding more generally for future national grid upgrades as it represents a viable, community-supported, and cost-effective solution that aligns with the shared commitment to achieving net zero targets efficiently. Underground HVDC for N2T could be a useful opportunity to import the necessary skills and experience (e.g. from Germany, where it is common practice). The government continues to reject such representations.	
	National Grid have also introduced a new argument in favour of N2T HVAC pylons. This is that N2T is required to “mesh” with the grid network along its length (i.e. new	

Topic	Comment	National Grid's response
	connections for take-off or for additional generating or storage capacity.) This is not in their 'needs case'. It was not considered to be relevant in the ESO EANS study. It should therefore be dismissed as an argument against HVAC undergrounding (option 8). National Grid also has argued against HVDC undergrounding through the Dedham SLA, as part of N2T's overall HVAC pylon project. This was never relevant objection since nobody ever suggested HVDC undergrounding for just part of the HVAC line. The government has politicised their support for N2T as it stands. The Prime Minister himself called opponents to N2T "blockers" or "wreckers" in his 2024 Labour conference speech. This and other statements by ministers have made it clear that National Grid is expected to continue with N2T regardless of the merits of the arguments in favour of viable alternatives. The 2030 deadline for decarbonising the	

Topic	Comment	National Grid's response
	National Grid is itself a subjective and political target, which has no bearing on the merits of the case for N2T. I therefore urge the Inspector, either: 1. To reject the application for the DCO for NT2; or 2. To mitigate its impacts as far as possible, taking into account the harms described above eliminating residual harm to the Dedham Vale and Colne Valley, and set out in more local detail in the many representations that the Inspectorate will have received. I reserve the right to make further representations. Sir Bernard Jenkin MP (Harwich and North Essex) House of Commons London SW1A 0AA [REDACTED]@parliament.uk 27th November 2025	

2.49 Sport England

- 2.49.1 Table 2.49 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Sport England [RR-3420]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.49 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	Sport England –Role and Policy Sport England is the non-departmental public body responsible for delivering the Government's community sporting and physical activity objectives. Sport England is also a statutory consultee on planning applications affecting playing fields. Sport England is consulted as a non-statutory consultee on Development Consent Orders for NSIPs and assesses proposals in accordance with our Playing Fields Policy (proposals affecting playing fields), our Planning for Sport Guidance (all other proposals) and the NPPF. It should be noted that if this proposal was being progressed as a planning application rather than a DCO then Sport England would have been a statutory consultee due to the impact of the proposal on	Noted

Topic	Comment	National Grid's response
	playing fields. In this context, we would wish to make comments on the following proposals which form part of the DCO. The Proposal and Assessment against Sport England's Objectives and the NPPF	
Socio-Economics, Recreation and Tourism	White Notley Football Club, Faulkbourne, Braintree District As set out on page 72 of Document 6.15 Volume 6: Environmental Statement Chapter 15 – Socio-economic, Recreation and Tourism (PINS Ref: APP-265), the proposal would have temporary impacts on White Notley Football Club's site as shown on Drawing Ref: Works Plan Section E (Sheet 5 of 8) (PINS Ref: APP-021). White Notley FC is located between the villages of Faulkbourne and White Notley and the club has been established on its site for nearly 75 years. The club's facilities consist of two adult football pitches (one overmarked with a 9v9 junior pitch), a small floodlit all weather training pitch and a clubhouse. Car parking to support the use of the club's	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. Access to the football club, second main football pitch at the eastern extent and a further training pitch at the eastern extent would be maintained, with a period of disruption to the western football pitch as set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The assessment also set out that separate discussion with the landowner would be undertaken prior and during construction to manage access and minimise disruption during the overhead line stringing work. Given the rolling nature of the linear works, the construction activities in any particular area are likely to be short-term, with no significant adverse effects anticipated during construction. No physical works are proposed for the permanent acquisition of rights of access in sections of the football pitches, with no significant adverse effects during operation (and maintenance) anticipated. The precise timing and duration of potential disruption to the western football pitch are not available at the current design stage. For the purposes of the assessment, a conservative worst-case assumption of up to four years of disruption has been applied. However, this scenario is considered unlikely given the phased and rolling nature of the construction programme. Further detail on the timing and duration of any disruption will be confirmed post-consent. Engagement with Sports England and White Notley Football Club has been ongoing since April 2025 to clarify the potential impact on the club. A draft Statement of Common Ground is currently under discussion between the Applicant, White Notley Football club (WNFC) and Sport England regarding the Norwich to Tilbury Project and its potential impact on WNFC. Discussions have progressed to the point where it is acknowledged that the proposed overhead line alignment has been revised to prevent any permanent

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	facilities is principally provided in the informal lay-by area along Church Hill that runs parallel to the club's first pitch. Overflow parking is provided on the grass to the south of the second football pitch adjoining Church Hill. The club currently runs 8 adult, youth and mini football teams who use the site for their home matches and training. The site is also used by White Notley CofE Primary School for meeting their educational needs due to the limited playing field provision on the school's own site. Based on the information submitted with the DCO application and discussions with the applicant it is understood that part of one of the football pitches (the western pitch) would need to be used on a temporary basis for overhead line construction associated with stringing. It has been advised that specialist tractors would need to use part of the pitch to support the stringing work. At this stage of the project, the duration of the	apparatus being installed on or above the playing pitches, and no permanent loss of playing field land is expected. Further points under consideration include maintenance access, traffic management, protection of parking areas, safety buffers, match-day arrangements, and commitments to reinstatement and compensation should temporary impacts occur. National Grid has indicated its intention to avoid accessing the second pitch and, if necessary, to restore any affected areas using specialist contractors, with an option to formalise compensation and reinstatement through a side agreement as detailed design continues. As part of the ES assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to recreational assets. These are set out in the 7.2 Outline Code of Construction Practice (Revision C) and 7.3 Outline Construction Traffic Management Plan (Revision B). 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329].

Topic	Comment	National Grid's response
	stringing works, when the works would take place, the areas of the pitch that would be affected and the extent of potential damage to the surface of the pitch are unknown. However, it would appear likely that for a temporary period the football club would not have access to a second football pitch and may therefore need to find alternative venues for matches, which would in turn have implications for the club in terms of financial cost and club development (e.g. risk of players/coaches joining other local clubs rather than travelling to alternative venues). The DCO also makes provision for National Grid to have permanent access to part of the site to support the long term maintenance of the overhead line although the impact of this on the use of the pitch is expected to be minimal.	
Socio-Economics, Recreation and Tourism	Permanent loss of pitches or ancillary facilities that support the use of the pitches such as car parking would be contrary to Government policy in paragraph 104 of the NPPF	The Applicant notes the respondent's feedback. Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by National Planning Policy Statements EN-1 (2024) and EN5 (2024). However, national planning policy in the form of the National Planning Policy Framework (NPPF) and local planning policy was also considered in developing the design of the Project where possible.

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	and Sport England's Playing Fields Policy unless acceptable replacement provision was made as part of the proposals. While a pragmatic approach can be taken to temporary impacts on playing fields, the acceptability of such proposals is assessed on a case by case basis and will depend on the scope of the impact, the duration of the impact, the acceptability of any temporary mitigation proposals and the playing field restoration proposals. Proposals which would have an unacceptable temporary impact would be considered in the same way as proposals that would have a permanent impact.	5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies.
Socio-Economics, Recreation and Tourism	Temporary impacts that resulted in the loss of access to the club's facilities are unlikely to be acceptable unless the impact was limited to a very short period of time that minimised the impact on the club and any damage to pitches or ancillary facilities could be fully restored within an acceptable time period. It should be noted that even if	Given the rolling nature of the linear works, the construction activities in any particular area are likely to be short-term. The detailed period of disruption is unknown at the time of writing the ES assessment and at the current design stage. The Applicant is keen to maintain an ongoing engagement with White Notley Football Club and Sports England to ensure impacts will be kept to a minimum where practicable. Please note that financial matters fall outside the Environmental Impact Assessment (EIA) and will be addressed separately through direct engagement with landowners and the implementation of appropriate compensation arrangements in accordance with the Compensation Code. The Applicant is working with White Notley Football Club to reduce or remove the potential impacts on their second football pitch, and where any impacts cannot be removed suitable mitigation and / or compensation will be agreed.

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	access to alternative football pitches could be found within the local area for a short term period for meeting the club's needs, the impact on reduced access to the club's facilities would need to be compensated for. The revenue generated by the use of the clubhouse (refreshments, social events etc) by club members and other community users funds the maintenance of the club's facilities and pays for the club's rent, utility bills etc. Even if the clubhouse was not directly affected by the proposals, the need to relocate a substantial amount of the use of the football pitches to alternative venues would need to be satisfactorily compensated for because reduced use of the pitches will have an affect on such revenue which in turn will affect the sustainability of the club.	
Socio-Economics, Recreation and Tourism	As well as the direct impacts on the White Notley FC's facilities, consideration will need to be given to how the use of Church Hill for construction related traffic would impact on the use	Church Hill is designated as a Primary Access Route, and will therefore be subject to the monitoring and mitigations detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). This includes mitigations that construction vehicles will not be able to park on the public highway, with HGV drivers parking or waiting in inappropriate locations captured as a matter of Non-Compliance.

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	of the football club during the construction period. This is pertinent in view of car parking to serve the club being provided mainly in the lay-by on Church Hill and the majority of the users of the football club being children and young people.	The Community Liaison (Section 6.5) of 7.3 Outline Construction Traffic Management Plan (Revision B) provides detail on how members of the community and local businesses will be kept informed.
Consultation	During the pre-application and pre-examination periods, National Grid has positively and constructively engaged with Sport England, the Essex County FA and White Notley Football Club in order to explain the expected impacts of the temporary works and to identify and discuss how impacts can be minimised and mitigated. This approach has been welcomed and the dialogue had addressed many of the initial potential concerns. These discussions are ongoing and National Grid intends to prepare Statements of Common Ground with Sport England and White Notley Football Club in advance of the examination with a view to identifying how impacts will be addressed as far as possible if	The Applicant acknowledges the positive and constructive engagement undertaken to date with Sport England, the Essex County FA and White Notley Football Club, which has helped to identify key issues and inform the approach to minimising and mitigating impacts. The Applicant confirms its commitment to continue and, where necessary, deepen this engagement as the proposals develop, including progressing detailed discussions on mitigation and securing mechanisms, with a view to reaching mutually agreeable solutions and, where possible, advancing Statements of Common Ground in line with the examination. The Applicant has reached out to Sport England and White Notley Football Club to arrange a further meeting to discuss points raised in the Statement of Common Ground and to advance discussions on potential construction affects and suitable mitigation. The Applicant believes that following further detailed design and engagement the Applicant will be able to reduce the required work areas and phase the planned works so that the White Notley Football Club can continue to operate. Please see 8.3.63 Draft Statement of Common Ground - Sport England (Final Issue A) [REP1-130] and 8.3.64 Draft Statement of Common Ground - White Notley FC (Final Issue A) [REP1-131] as the latest SoCGs.

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	the DCO is approved. Sport England would hope that an agreed Statement of Common Ground could be prepared in advance of the examination and that the agreed mitigation measures can be formally secured through mechanisms such as conditions if the DCO is approved. This would then hopefully negate the need to participate further in the examination. In light of the above assessment, in the interim of a Statement of Common Ground being agreed and details of measures to secure the agreed mitigation measures being confirmed, Sport England's position on the DCO would be an objection to proposals affecting White Notley Football Club's site in their current form. This is because it is not possible to make an informed assessment of the acceptability of the proposed mitigation measures at this stage. However, this position would be reviewed in advance of the examination commencing if an agreed Statement of Common Ground was completed and	

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	there was clarity on how the agreed mitigation measures would be secured through the DCO. It is advocated that National Grid continue its positive and constructive engagement with Sport England, the Essex County FA and White Notley FC in advance of the examination commencing with a view to reaching mutually agreeable solutions to address the impacts that have been identified.	
Socio-Economics, Recreation and Tourism	Tibenham Airfield a National Significant Area for Sport Tibenham Airfield ('the Airfield') is recognised as a National Significant Area for Sport (SASPs). The Airfield is the home site of the Gliding Club, where it has operated successfully since 1959. The club is a Community Amateur Sports Club and as such is open to all. In conjunction with the governing bodies of gliding, parachuting, water-skiing, and canoeing Sport England has designated a number of sites	6.15.A2 Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267] acknowledges that Tibenham aerodrome is recognised as a national Significant Area for Sport (SASP) by Sport England and its operational activities in terms of hosting gliding completions has been taken into account as part of the impact assessment. (paragraphs 15.4.22 to 15.4.25 refer) Furthermore, within the Appendix, the Applicant recognises that, whilst the Overarching National Policy Statement for Energy (EN-1) provides the primary policy for decisions taken by the Secretary of State in applications for electricity networks infrastructure, account may be taken of the provisions of the National Planning Policy Framework (NPPF) relating to aviation, and any relevant supplementary Planning Practice Guidance (see paras. 15.2.1, 15.2.12 and 15.2.13).

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	across the country as SASPs. You can find out more about SASPs on our website under the sub headings 'how we can help, then facilities and planning, followed by planning for sport, and then significant areas for sports. It is however recognised as being more appropriate for sports that rely on natural environment locations due to their uniqueness and scarcity. SASPs do not carry a statutory status. They do carry the weight of being identified by the national governing bodies of sport as the most important sites for their sports, while also being acknowledged and supported by Sport England. Additional weight should be afforded to the site's protection if it becomes under threat. Reasons being are that SASPs rely on features and locations which are by their very nature scarce, and vulnerable. Inappropriate development around a SASP can lead to its loss, and where that development is of a type (such as pylons) which can be proposed in a variety of other	

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	locations in the area, then we advise further consideration is given towards the protection of the SASP. Listing SASPs and detailing why they're important, ensures that the effects of development upon SASPs are taken into account with the knowledge and understanding of their importance and significance to sport. Tibenham Airfield has attained the status of a national SASP for the following reasons: <i>[Attribute Score Comment Competitions and Events Very high, sic]</i> This is a large airfield where they regularly hold national competitions Training High Instructor (coach) training takes place. Occasional elite training Scarcity Medium Good access to uncontrolled airspace Heritage Very high There has been gliding on this site since 1959 Number of users High The club is in the large category used by the BGA (100 – 200 members) Facilities Strategy Very high The only site within the area particularly to the North East of the airfield Physical characteristics Very	

Topic	Comment	National Grid's response
	high Hard runways not susceptible to flooding. Good hangar, briefing room and clubhouse. On site catering and accommodation available. Planning Policy and Guidance Paragraph 111 (f) of the NPPF is relevant for aviation, and states planning policies should, 'recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy.' The General Aviation Strategy (March 2015) specifically refers to gliding as being a significant part of the general aviation community and notes the economic benefits that can be generated from this sporting activity. In the strategy the British Gliding Association (BGA) notes the social benefits as a recreational activity, providing physical and mental health benefits to participants (page 18).	

Topic	Comment	National Grid's response
	In this case, policy and guidance can also be related to the recreational and economic benefits of the Gliding Club who operate from Tibenham Airfield. Paragraph 98 (c) of the NPPF requires planning decisions to guard against the unnecessary loss of valued facilities and services and paragraph 103 of the NPPF states that access to high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.	
Socio-Economics, Recreation and Tourism	Impact of the Proposal upon the SASP As the Airfield operators, Norfolk Gliding Club are the experts in determining what is and is not safe in respect of its operations. Norfolk Gliding Club explained its concerns in their initial letter to the National Grid, authored by Anthony Griffiths, dated. The BGA, in their letter dated July 26th, 2024, explained in detail the implication of the proposals upon Tibenham Airfields, regarding launch failures,	The Applicant has consulted with and has considered the concerns of Norfolk Gliding Club (NGC), the operator of Tibenham aerodrome, and the British Gliding Association (BGA) regarding potential aviation impacts. The position of the Applicant is that, whilst the Project will represent a new obstacle in the vicinity of the aerodrome, safe aviation operations can continue. Further details of the aviation impact assessment are within 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] (see para. 15.4.24 and Table A15.2.11), including safety consideration regarding gliding-specific operational activities (such as aerotow take-offs) as well as forced landing risks following Engine Failure After Take-Off (EFATO) 6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266] provides a summary of the Applicant's conclusion that no restrictions on the number of aircraft movements or the types flown from the aerodrome will result from the Project, and therefore no significant effects are anticipated during the Project's construction or operation. Changes to the Project design have not

Topic	Comment	National Grid's response
	competitions, risk on pilot capacity and utility, and the effect on club activity and capacity. In response to Sport England's comments dated 26 July 2024 and 25 February 2025, as well as the BGA's response dated 2 March 2025, a Review of Aviation Impact ("the Review") has been completed and submitted. We can provide these responses at a later stage, if required to support the examination, as we are unable to upload them at this time.	been implemented as are not considered to be appropriately justified by potential adverse impacts to the aerodrome. Further explanation of this consideration is provided within 5.15 Design Development Report [APP-122] (see paras. 2.6.9, 4.5.1 and 4.5.2). The Applicant has responded to detailed matters concerning Norfolk Gliding Club (NGC) and British Gliding Association (BGA) comments as referred to in this Relevant Representation within 8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105] as well as in its response to the Norfolk Gliding Club Written Representation [REP1-256] - see 8.8.1 Applicant's Comments on Written Representations [REP2-029].
Safety and Security	The BGA and Norfolk Gliding Club have advised that the Review does not adequately address the issues previously raised regarding the routing of 55m high pylons 1.77 km to the west of Tibenham Airfield home of the NGB ability to operate safely nor does it address the potential reduction in facility. Within the BGA's letter, they have outlined the specific reasons. In summary, they advise the Review overlooks several important safety and operational issues related to	Please see response above. Please note that perceived effects (e.g., attractiveness) is not within the scope of the Socio-economics, Recreation and Tourism ES assessment. ES assessments are set out to provide an objective, evidence-based evaluation of the potential impacts and effects

Topic	Comment	National Grid's response
	proposed pylons. These include risks from degraded climb rates that could result from partial power loss or unlocked airbrakes, conflicts with aviation rules regarding obstacle clearance, and increased danger during engine-failure or rope-break scenarios due to forced low-altitude manoeuvring, which is contrary to EFATO teaching regarding prescribed landing in an area within a narrow band either side of the nose up to approximately 30 degrees. It also states that the assessment fails to consider negative effects on gliding competitions at a national SASP site, where the pylons could make competitions more complex and less appealing due to heightened perceived risk.	
Socio-Economics, Recreation and Tourism	Adversely affecting the recreational and economic benefits of the Gliding Club would be contrary to paragraphs 98(c) and 103 of the NPPF. Sport England would not wish to see development permitted in the proximity of Tibenham Airfield	An assessment on the Tibenham Airfield has been undertaken as part of the ES. 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266] concludes that the recreational business is anticipated to be able to operate safely with no restrictions on the number of movements or the aircraft types flown, with a neutral and not significant effect during construction and operation.

Topic	Comment	National Grid's response
	which will necessitate a reduction in flying activity and as a result harm this nationally important gliding SASP. As the agent of change, it is incumbent to show that the proposal will not impact on the flying activity of the Gliding Club.	
Socio-Economics, Recreation and Tourism	The adverse impacts of the proposal upon the Airfield would affect the reasons why the site was designated as a SASP by the British Gliding Association, the sport's governing body. The Airfield has a rich history of gliding dating back to 1959, and was very highly regarded for its heritage, facilities strategy, and physical characteristics. If the proposal were to compromise the safety and viability of the site, it would make the site less attractive to competitors in turn jeopardising its ability to host national competitions, events, and training sessions, all areas where the SASP scored either highly or very highly.	Please see response above regarding operation of the business. Please note that perceived effects (e.g., attractiveness) are not within the scope of the Socio-economics, Recreation and Tourism ES assessment. ES assessments are set out to provide an objective, evidence-based evaluation of the potential impacts and effects. As previously stated, the Applicant's aviation impact assessment concluded the aerodrome can continue to operate safely. The Applicant has consulted with and considered the concerns of the aerodrome operator and the British Gliding Association (BGA) regarding potential aviation impacts, including on competition flying. The Applicant is continuing to engage with the operator to seek agreement to the acceptability of the Project and/or develop appropriate mitigation measures, such as potential changes to the operational procedures of the aerodrome (including in relation to gliding competitions, in accordance with relevant BGA guidance). Measures to enhance pilot situational awareness have been suggested and may address residual or perceived risks.
Consultation	Sport England support the BGA's and Norfolk Gliding Club's concerns, and advises	The Applicant is continuing to engage with the operator to seek agreement to the acceptability of the Project and/or develop appropriate mitigation measures, such as potential changes to the operational procedures of the aerodrome (including in relation to

Topic	Comment	National Grid's response
	the National Grid to address, and consult with the Gliding Club and BGA to overcome their concern in advance of the examination commencing with a view to reaching mutually agreeable solutions to address the impacts. This is necessary to ensure the proposal allows for safe and viable ongoing gliding operations at Tibenham Airfield and does not prejudice a national signification site for sport.	gliding competitions, in accordance with relevant BGA guidance). The Applicant considers the requirements of EN-1 paras. 5.5.44 and 5.5.50, which place an expectation on operators to regularly review the possibility of agreeing to make reasonable changes to its procedures, to be relevant to this engagement.

2.50 Sproughton Parish Council

- 2.50.1 Table 2.50 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Sproughton Parish Council [RR-0601]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.50 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	Sproughton parish council wish to represent the local community with their concerns regarding the proposed application.	
Landscape and Visual	We wish to raise serious concerns regarding the proposed route from Bramford Substation, which runs along the highest point of our parish at approximately 50m. This will have a domineering and lasting impact on the character of the parish.	The Applicant notes the concerns of Sproughton Parish Council. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Within Sproughton Parish, parts of two existing 132 kV overhead lines would be removed to accommodate the Project, as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. Bramford Substation is located at a high point on the plateau above Sproughton, and the Project would therefore cross higher ground before descending to cross the valley at Washbrook Street. Effects on visual receptors within Sproughton Parish are set out under Visual Receptor Areas (VRA) C1, C2 and C3 in paragraphs 13.6.1 to 13.6.34 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors are assessed as significant within approximately 1.5 km, with the exception of within wooded valleys and at Abbey Oaks where effects would be not significant. Effects on landscape character within Sproughton Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment

Topic	Comment	National Grid's response
		[APP-228] under the Rolling Valley Farmland Landscape Character Type (LCT) (paragraphs 13.3.296 to 13.3.310), Ancient Plateau Claylands LCT (paragraphs 13.3.227 to 13.2.241), Plateau Farmland LCT (paragraphs 13.3.322 to 13.3.336), Valley Meadowlands LCT (paragraphs 13.3.282 to 13.3.295), Rolling Estate Farmlands LCT (paragraphs 13.3.271 to 13.3.281) and Urban LCT (paragraphs 13.3.171 to 13.3.182). Significant effects are identified within approximately 1.5 km of the Project within the Rolling Valley Farmland LCT and Ancient Plateau Claylands LCT, and within approximately 0.5 km within the Plateau Farmlands LCT. No significant effects are identified at operation within the Valley Meadowlands LCT, Rolling Estate Farmlands LCT or Urban LCT within Sproughton Parish. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Sproughton, including the historic landscape. The assessment concluded there would be no significant effects to the historic landscape in this area and the Project would not result in any substantial harm to designated heritage assets. Embedded and standard mitigation proposals for designated heritage assets and historic landscape are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Biodiversity, ecology and nature conservation	The route circles closely around Burstall Long Wood and Round Wood, passes through a designated environmental area,	The ecological importance of ancient woodland and its classification as irreplaceable habitat is acknowledged by the Project. Through routeing, siting and design development, the Applicant has sought to avoid, or if unavoidable, reduce impacts to ancient woodlands. Potential direct and indirect impacts on ancient woodlands within the Study Area have been considered within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] .

Topic	Comment	National Grid's response
		7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] includes a detailed assessment of impacts on each ancient woodland and identifies any necessary mitigation required to ensure no significant residual effects on any ancient woodlands. The Applicant can confirm that there will be no impact to Burstall Long Wood ancient woodland, with no works proposed within the woodland or excavation works proposed within a 15 m root protection zone buffer. Round Wood ancient woodland has an existing 132 kV overhead line through it, which will be removed as part of the Project. This removal and subsequent undergrounding of the existing 132 kV outside of the woodland and the associated 15 m buffer, will have an overall benefit to Round Wood ancient woodland. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts to ancient woodlands and include specific mitigation measures as appropriate to ensure no significant residual effects.
Transport and Traffic	and crosses four public rights of way (PROW),	The Applicant notes concern regarding impacts on Public Rights of Way (PROWs) within Sproughton Parish. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PROW. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PROWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PROWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PROW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PROW Management Plan. The Project will cross six PROWs within Sproughton Parish: Footpaths W-486/006/0, W-486/004/0, W-486/003/0, W-486/019/0, W-486/020/0, W-486/017/0 and W-486/018/0. All of these PROWs except Footpath W-486/003/0 will remain open on their existing alignment, with access managed as necessary in accordance with 7.6 Outline PROW Management Plan [APP-329]. Where these PROWs interact with working areas,

Topic	Comment	National Grid's response
		appropriate safety measures will be implemented to allow continued safe passage for PRow users during construction of the Project. Footpath W-486/003/0 will also require a temporary diversion over a duration of approximately two months associated with a working area for overhead conductor stringing, and a further two months associated with the installation of crossing-protection scaffolding at Burstall Lane. During these periods, a localised diversion around the relevant working areas will be provided. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRow management arrangements are developed. An assessment of the residual effects on delay to users of PRowS within Sproughton Parish can be found within in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Where temporary closures with diversions are proposed, an assessment of residual effects on delay is presented within Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The temporary diversion of footpath W-486/003/0 will increase the journey time by less than one minute, therefore, it was concluded that no significant impact of delay to PRow users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. A recreational route assessment has been undertaken in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant adverse effects have been identified for recreational routes located within Sproughton Parish Council in terms of accessibility. An assessment of the impacts of the Project on physical activity has been undertaken and the findings are presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. No significant impacts relating to physical activity have been identified for Sproughton and Pinewood ward; whilst a small minority of the population may be affected, alternative routes are generally available for use for the period over which

Topic	Comment	National Grid's response
		effects are predicted to last and impacts are appropriately mitigated by standard good practice construction management measures.
Landscape and Visual	scarring both a high plateau and a valley with long-reaching views.	Effects on landscape and visual receptors within Sproughton Parish are set out in the Landscape and Visual row above. Long distance views are noted within the description of the visual baseline from Hadleigh Road within VRA C3 (paragraph 13.6.26), from ridges and higher ground within VRA C2 (paragraph 13.6.14) and from higher land on low ridges located to the south-east of Burstall within VRA C1 (paragraph 13.6.2).
Transport and Traffic	Our concerns fall into four main categories. 1. Installation Traffic The construction and installation phase will inevitably generate significant volumes of HGV traffic.	The construction vehicle routeing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. The Applicant is not proposing to route any PARs directly through Sproughton village. The closest PAR south of Sproughton is the A1071, with Bullen Lane used as a PAR to the north within Bramford. As noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the A1071 is proposed to have 25 additional HGVs in the AM and PM Peak hours during the worst-case construction period for a duration of 11 weeks. Bullen Lane is proposed to have an additional 62 LGVs and 28 HGVs in the AM and PM Peak hours during the worst-case construction period with a duration of one week. The Applicant is proposing crossover bellmouths to be installed on Burstall Lane and A1071 to enable the construction traffic to continue travelling on the internal haul road. This will require short-term, temporary closures. Sproughton High Street (B1113) is proposed to be used as a diversion route for both temporary closures. The diversion routes are detailed on Plan A of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035].
Transport and Traffic	Our parish roads are narrow, rural, and ill-suited to sustained HGV use.	The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. The Applicant is not proposing to route any PARs directly through Sproughton village. The closest PAR south of Sproughton is the A1071 (PAR 23), with Bullen Lane (PAR 21) and B1113 Bramford Road/B1113 Loraine Way (PAR 20) used to the north within Bramford.

Topic	Comment	National Grid's response
		The Applicant is proposing crossover bellmouths to be installed on Burstall Lane and A1071 to enable the construction traffic to continue travelling on the internal haul road. Sproughton High Street is proposed to be used as a diversion route for both closures. The diversion routes are detailed on Plan A of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035]. Where a diversion route is proposed, they will adopt the principle of using the same standard of road, or higher where practicable and available. The Applicant is proposing to route Abnormal Indivisible Loads (AILs) through Sproughton Village, along the B1113 to Bramford Substation. Mitigation measures including removal of street furniture and street parking suspension is proposed to enable the safe movement of the design vehicle, additional information is detailed in Sheet 4 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section C [APP-315].
Transport and Traffic	Increased traffic will not only cause congestion but also pose safety risks to pedestrians, cyclists, and local residents.	The Applicant is not proposing to route any Primary Access Routes (PARs) through Sproughton village. The closest PAR south of Sproughton is the A1071 (PAR 23), with Bullen Lane (PAR 21) and B1113 Bramford Road/B1113 Loraine Way (PAR 20) used to the north within Bramford. The Applicant is proposing crossover bellmouths to be installed on Burstall Lane and A1071 to enable the construction traffic to continue travelling on the internal haul road. As noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the A1071 (PAR 23) is proposed to have 25 additional HGV movements in the AM and PM Peak hours during the worst-case peak construction period of 11 weeks. On Bullen Lane (PAR 21) and the B1113 Bramford Road/B1113 Loraine Way (PAR 20) it is proposed to have an additional 62 LGV movements and 28 HGV movements in the AM and PM Peak hours over a duration of one week. The Applicant has undertaken a complete and full assessment of PAR 20, PAR 21 and PAR 23 used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333] which examines capacity of key sensitive junctions, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Mitigation has been proposed at junctions as set out in Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B).

Topic	Comment	National Grid's response
		6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project and significance of residual construction effects on traffic flow, delays, road safety and impact on walking, cycling and horse-riding on amenity, severance and fear and intimidation along the PARs located on the Local Road Network. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] it was concluded that for PAR 20 and PAR 21 there would be no significant residual construction effects as a result of increased traffic when taking account of the mitigation detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). For PAR 23, it was found that the residual construction effects on driver delay would be significant based on the increase in cumulative daily traffic. The Applicant understands that congestion at junctions along the A1071 (PAR 23) would be minimised should the planned upgrades to the A1214 London Road / A1071 junction (Site 31) and A1071 / B1113 Swan Hill roundabout (Site 32) be constructed prior to the Project. These upgrades are part of the planning application Land North of the A1071, Ipswich (Wolsey Grange) Ref DC/21/02671 granted in 2023 which would sufficiently accommodate the committed development flows and the construction traffic from the Project without significant capacity issues. The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP_309]. The proposed mitigation includes the provision of a driver information pack, in which locations on the highway network with pedestrians and cyclists are noted, with appropriate actions.
Transport and Traffic	A particular concern is Sproughton village , which already experiences severe disruption from HGVs. Despite existing weight restriction orders on the B1113, lorries frequently use the narrow village road as a cut-through when the A14 is congested. Suffolk County Council's Lorry Watch scheme	The construction routing strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B) and has been developed to manage the impact of construction vehicles on the public highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. The Applicant is not proposing to use the B1113 from the A1071 through Sproughton village as a Primary Access Route. Any construction HGV not adhering to the agreed routes has been defined as a matter of non-compliance and will be enforced through Section 6.4 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route Abnormal Indivisible Loads (AILs) through Sproughton Village, along the B1113 to Bramford Substation. Mitigation measures including removal of

Topic	Comment	National Grid's response
	exists precisely because such restrictions are often ignored.	street furniture and street parking suspension is proposed to enable the safe movement of the design vehicle. The AIL movements are managed through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. The Project will keep residents fully informed of the details in relation to the timing of the delivery of AILs. Ahead of any delivery, the Community Liaison Officer will communicate, where appropriate, information via local notice boards, email updates to stakeholders and those who have registered for updates. The communication could also include notifications issued to the local press and, where appropriate, notification letters/emails to local residents and businesses that may be impacted.
Transport and Traffic	Adding installation traffic from this project would exacerbate an already unsustainable situation, undermining both road safety and community wellbeing.	The Applicant is not proposing to route any Primary Access Routes (PARs) through Sproughton village. The closest PAR south of Sproughton is the A1071 (PAR 23), with Bullen Lane (PAR 21) and B1113 Bramford Road/B1113 Loraine Way (PAR 20) used to the north within Bramford. The Applicant is proposing crossover bellmouths to be installed on Burstall Lane and A1071 to enable the construction traffic to continue travelling on the internal haul road. As noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the A1071 (PAR 23) is proposed to have 25 additional HGV movements in the AM and PM Peak hours during the worst-case peak construction period of 11 weeks. On Bullen Lane (PAR 21) and the B1113 Bramford Road/B1113 Loraine Way (PAR 20) it is proposed to have an additional 62 LGV movements and 28 HGV movements in the AM and PM Peak hours over a duration of one week. The Applicant has undertaken a complete and full assessment of PAR 20, PAR 21 and PAR 23 used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333] which examines capacity of key sensitive junctions, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Mitigation has been proposed at junctions as set out in Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B). 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project and significance of residual construction effects on traffic flow, delays, road safety and impact on walking, cycling and horse riding on amenity, severance and fear and intimidation along the PARs located on

Topic	Comment	National Grid's response
		the Local Road Network. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] it was concluded that for PAR 20 and PAR 21 there would be no significant residual construction effects as a result of increased traffic when taking account of the mitigation detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). For PAR 23, it was found that the residual construction effects on driver delay would be significant based on the increase in cumulative daily traffic. The Applicant understands that congestion at junctions along the A1071 (PAR 23) would be minimised should the planned upgrades to the A1214 London Road / A1071 junction (Site 31) and A1071 / B1113 Swan Hill roundabout (Site 32) be constructed prior to the Project. These upgrades are part of the planning application Land North of the A1071, Ipswich (Wolsey Grange) Ref DC/21/02671 granted in 2023 which would sufficiently accommodate the committed development flows and the construction traffic from the Project without significant capacity issues. The Applicant has developed 7.3 Outline Construction Traffic Management Plan (Revision B). The proposed mitigation includes the provision of a driver information pack, in which locations where pedestrians and cyclists use the highway network are noted, with appropriate actions.
Transport and Traffic	We are also concerned about damage to road surfaces, drains and verges, which are already fragile.	The Applicant is not proposing to route any construction traffic through Sproughton village. The Applicant is proposing a Primary Access Route on the A1071, south of the village, within the Parish. The Applicant is proposing to undertake pre-and-post construction condition surveys on routes proposed to be used by HGVs. In line with mitigation measure GG06 in 7.2 Outline Code of Construction Practice (Revision C), a record of condition will be carried out (photographic and descriptive) of the working areas that may be affected by construction activities. This record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the pre-condition survey. The Applicant is proposing traffic mitigation measures on the A1071, including the removal of street furniture and suspension of street parking, to enable the safe movement of the design vehicle. Additional information is included in Sheet 4 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section C [APP-315].

Topic	Comment	National Grid's response
Noise and Vibration	2. Noise Noise pollution during both the installation and operational phases is a major concern. Construction traffic, machinery, and installation works will create prolonged disturbance, affecting residents' quality of life. The elevated route across the parish means noise will carry further, impacting a wide area. Given the tranquil, rural character of the parish, even moderate increases in noise levels will be highly intrusive. We urge the inspectorate to require detailed noise assessments and robust mitigation measures.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the construction and operational phases of the Project and recommends appropriate mitigation measures (in consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the ES (Volume 6 of the DCO application), in accordance with 6.20 Scoping Opinion [APP-297], on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261], which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions. Volume 6: Environmental Statement [APP-123 to APP-287] has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air and noise pollution have been defined within each environmental topic chapter and set

Topic	Comment	National Grid's response
		out in relevant management documents submitted with the Development Consent Order application, including 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).
Biodiversity, ecology and nature conservation	3. Environmental Impact Appendix A The proposed route passes alarmingly close to Burstall Long Wood and Round Wood, both ecologically sensitive areas. The incursion into a designated environmental zone risks damaging habitats, biodiversity, and the integrity of the landscape.	The ecological importance of ancient woodland and its classification as irreplaceable habitat is acknowledged by the Project. Through routeing, siting and design development, the Applicant has sought to avoid, or if unavoidable, reduce impacts to ancient woodlands. Potential direct and indirect impacts on ancient woodlands within the Study Area have been considered within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] includes a detailed assessment of impacts on each ancient woodland and identifies any necessary mitigation required to ensure no significant residual effects on any ancient woodlands. The Applicant can confirm that there would be no impact to Burstall Long Wood ancient woodland, with no works proposed within the woodland, or excavation works proposed within a 15 m root protection zone buffer. Round Wood ancient woodland has an existing 132 kV overhead line through it, which would be removed as part of the Project. This removal and subsequent undergrounding of the existing 132 kV outside the woodland and the associated 15 m buffer, would have an overall benefit to Round Wood ancient woodland. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce impacts to ancient woodlands, and specific mitigation measures as appropriate to ensure no significant residual effects.

Topic	Comment	National Grid's response
Landscape and Visual	Appendix B The crossing of four PROWs will scar a high plateau and valley that currently provide uninterrupted, long-reaching views.	The Applicant has responded to these points in the rows above where previously raised in the RR.
Health and Wellbeing	Appendix C The PROWs will be directly under the pylons! This is not only an environmental issue but also a cultural and recreational one.	The Applicant has provided detail earlier in this response in relation to how PROWs are affected within Sproughton Parish, and appropriate mitigation / management measures as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329]. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on sports clubs, recreational land and recreational routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.2 Outline Code of Construction Practice (Revision C); 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329].

Topic	Comment	National Grid's response
Cumulative Effects	The cumulative effect of construction, habitat disruption, and visual intrusion will permanently alter the parish's character. 4. Cumulative Impact Appendix D The cumulative impact of pylons radiating from Bramford Substation is significant. With existing lines already dominating the landscape, the current Norwich–Tilbury application, and the approved Bramford–Twinstead reinforcement, the parish faces a layered and escalating burden.	The Applicant notes the concerns of Sproughton Parish Council in relation to existing and proposed overhead lines going into Bramford Substation. Existing overhead lines were considered as part of the baseline in the Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Within Sproughton Parish parts of two existing 132 kV overhead lines would be removed to accommodate the Project, as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] which includes a cumulative assessment on habitats and landscape and visual. In addition, the cumulative assessment assesses inter-project cumulative effects with the Bramford to Twinstead project. The assessment concludes major adverse significant effects during construction and operation (and maintenance) for landscape and visual.
Cumulative Effects	Any future applications will only intensify visual, environmental, and community impacts, making cumulative assessment essential.	The cumulative effects assessment has been undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. Since then, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement, these would be published into Examination (as appropriate). Other unknown future development that comes forwards would be subject to its own consenting and / or approval process which would likely need to provide its own cumulative assessment and implement any appropriate mitigation to avoid, prevent,

Topic	Comment	National Grid's response
		reduce and / or offset (where relevant and appropriate) adverse effects on the environment.
Transport and Traffic	1. What We Want the Inspectorate to Consider We ask the inspectorate to give full weight to the following points: The disproportionate impact of installation traffic on rural roads and communities, especially in Sproughton where weight restrictions are already being breached.	The construction routing strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B) and has been developed to manage the impact of construction vehicles on the public highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. The Applicant is not proposing to use the B1113 from the A1071 through Sproughton village as a Primary Access Route (PAR). The closest PAR south of Sproughton is the A1071 (PAR 23), with Bullen Lane (PAR 21) and B1113 Bramford Road/B1113 Loraine Way (PAR 20) used to the north within Bramford. Assessment results for these PARs are as noted above and details can be found in 7.11 Transport Assessment [APP-333] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The Applicant is proposing crossover bellmouths to be installed on Burstall Lane and A1071 to enable the construction traffic to continue travelling on the internal haul road. The Project also requires the transportation of Abnormal Indivisible Loads (AIL). The Applicant has developed specific routing proposals for AIL movements and these have been developed with engagement by the relevant stakeholders including the Local Highway Authorities and National Highways. The Applicant is proposing to route AILs along the B1113 through Sproughton to the proposed Bramford Substation location. Details on the proposed mitigation measures are illustrated in Sheet 4 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section C [APP-315]. This includes the temporary removal of street furniture and suspension of parking.
Noise and Vibration	<i>[We ask the inspectorate to give full weight to the following points:]</i> Appendix E The long-term consequences of noise pollution in a quiet, rural setting.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. Noise impacts are assessed in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in consultation

Topic	Comment	National Grid's response
		with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of Volume 6: Environmental Statement [APP-123 to APP-287] (ES), in accordance with 6.20 Scoping Opinion [APP-297], on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in 6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261], which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions. The ES has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the The Development Consent Order (DCO) application includes 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07,

Topic	Comment	National Grid's response
		AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C). The Construction Routeing Strategy is detailed within 7.3 Outline Construction Traffic Management Plan (Revision B) and has been developed to manage the impact of construction vehicles on the public highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. An assessment of the suitability of each Primary Access Route was completed prior to prescribing each route to be used for HGV movements. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within 7.3 Outline Construction Traffic Management Plan (Revision B) which is secured through Requirement 4 of 3.1 Draft Development Consent Order (Revision C). The Project also requires the transportation of Abnormal Indivisible Loads (AIL). The Applicant has developed specific routeing proposals for AIL movements and these have been developed with engagement by the relevant stakeholders including the Local Highway Authorities and National Highways. Details about these movements are submitted in support of the DCO application in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310].
Biodiversity, ecology and nature conservation	<i>[We ask the inspectorate to give full weight to the following points:]</i> The environmental harm to designated areas, ancient woodland, and biodiversity.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including designated areas and ancient woodland. The design process has taken account of existing biodiversity, and where practicable, seeks to reduce impacts on areas of ecological sensitivity through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys were undertaken, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce impacts on ecological receptors.

Topic	Comment	National Grid's response
		There would be no significant residual effects on ecological receptors as a result of the Project.
Landscape and Visual	<i>[We ask the inspectorate to give full weight to the following points:]</i> The visual and cultural damage caused by scarring a high plateau and valley with far-reaching views.	This point is responded to in row 4 of this table.
Alternatives	<i>[We ask the inspectorate to give full weight to the following points:]</i> The need for undergrounding within three miles of Bramford Substation to minimise the dominance of “pylon corridors.	National Policy Statement EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

2.51 Stoke by Nayland Parish Council

- 2.51.1 Table 2.51 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Stoke by Nayland Parish Council **[RR-3496]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.51 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	(A) Introduction On behalf of the residents of Stoke by Nayland, the parish council makes this submission to the Examining Authority in connection with the National Grid Norwich to Tilbury transmission scheme. We write to OBJECT to National Grid's proposals, both to the principle of the selected route corridor and to the location of certain facilities were the current corridor to be authorised.	Noted.
Landscape and Visual	(B) Relationship to Route Corridor Stoke by Nayland (SBN) occupies an elevated position within the Dedham Vale National Landscape, formerly known as the Dedham Vale AONB. Most of the parish lies within 3km of the project assessment boundary and all within the 5km range set by the promoter for "more distant	The Applicant notes the concerns of Stoke by Nayland Parish Council, the eastern part of which is within the 3 km Landscape and Visual study area (along the proposed cable route). Effects on visual receptors within Stoke by Nayland Parish are set out under Visual Receptor Area (VRA) C8 Higham in paragraphs 13.6.83 to 13.6.94 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on visual receptors are assessed as significant within approximately 0.5 km at construction, as a result of the undergrounding. Beyond 0.5 km and during operation, effects on views from receptors within Stoke by Nayland are assessed as not significant. Viewpoint 3.27: B1066 Park Road, near Thorington Street is located within Stoke by Nayland Parish, at a distance of approximately 4.8 km from the

Topic	Comment	National Grid's response
	viewpoints.....where there is potential for significant visual effects to arise". We note that the parish has also been significantly impacted by National Grid's Bramford to Twinstead Reinforcement scheme where an existing 400kV pylon line that is significant landscape and visual intrusion to the north and west of the parish is to be supplemented in the same pylon corridor by a second 50 metre-high lattice tower pylon route. Taken together with the newly proposed pylon corridor either side to the Great Horkesley undergrounding section through Essex, SBN will now be faced with new observable pylons to its south. We urge the Examining Authority to take due account of the cumulative landscape and visual impacts of the two visually intrusive schemes on national landscape around Stoke by Nayland.	Project. Effects on receptors at this viewpoint are assessed as negligible and not significant, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Part 2 of 4 [APP-230]. Inter-project cumulative effects with the Bramford to Twinstead Reinforcement scheme are considered in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. Major significant (adverse) cumulative effects are identified for landscape and visual receptors during construction and operation, however these significant effects would not be experienced within Stoke by Nayland Parish.
Alternatives	(C) Objection in Principle to the Selected Route We OBJECT to the principles underpinning the selection of an essentially overland pylon corridor to meet	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by

Topic	Comment	National Grid's response
	additional power transmission needs. It is our opinion that the Norwich to Tilbury pylons project brings severe and unnecessary harm to the environment, to communities and to the landscape and heritage across East Anglia. It is our understanding that alternatives such as offshore grids, undergrounding and the adoption of emerging advanced conductor technologies have not been presented for examination. It is our belief that these options offer significant affordable opportunities for transmission enhancement that will result in much reduced harms to the environment.	consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Good design	(D) Objection to Specific Proposals associated with the Selected Route We acknowledge that, following our earlier responses to non-statutory consultations in 2022 and 2023, a section of the former pylon route passing Great Horkesley has now been designated for undergrounding. However, it is our contention that the promoter has failed to take due regard to the visual	For the connection from the East Anglia Connection Node (EACN) Substation to Tilbury covering the area identified in the feedback, the pylons are outside a designated landscape which leads to a starting presumption, outlined in National Policy Statement (NPS) EN-5, for the use of overhead line technology. We do consider, for a section of the alignment north of Great Horkesley, that the alignment is within the setting of the National Landscape and the effects justify, in the terms of NPS EN-5 the additional cost and effects of adopting underground cable in place of overhead lines. However, we do not consider the effects of an overhead line on the National Landscape, the wider landscape or on community and other receptors to the east of the Great Horkesley Cable Sealing End (CSE) compound, i.e. east of TB34, to justify the additional cost of underground cable. As such, no change is proposed. The effects of the Project are presented in the

Topic	Comment	National Grid's response
	impact of the 50+ metre pylons that will remain to the immediate east of the Great Horkesley cable sealing end compound (GHE CSEC) on views from within the parish to the south across the nationally significant Stour Valley. We are concerned that the promoter has not given due consideration to middle-distance views of the new overhead powerline in Essex to the south from several key elevated positions within the parish will be highly visible along the skyline across the protected Stour Valley. We have offered on several occasions to work with the promoter to identify these critical viewpoints to enable a complete assessment to be made on the impacts on protected landscapes, and on communities and visitors. Specifically, we OBJECT to the currently proposed location of the GHE CSEC. To provide the necessary landscape protections and enhancements, we wish to see the GHE CSEC moved from its current location at TB033/034 to the east and for this facility to be sited within the	Environmental Statement (ES) [APP-123 to APP-287, AS-026 and AS-068] and this has identified any need for additional mitigation. The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The viewpoints were discussed with relevant Local Planning Authorities, including Babergh District Council, as set out in the relevant Statements of Common Ground (5.9.1 – 5.9.12 [APP-089 to APP-100]). The Landscape and Visual Impact Assessment (LVIA) viewpoints are a representative selection of publicly accessible locations along the Project route, capturing a range of receptors and a variety of distances and viewing directions. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in 7.12 Visualisations [APP-343 to APP-351]. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The number of viewpoints assessed in the LVIA (206) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are also presented in 7.12 Visualisations [APP-343 to APP-351]. It is important to note that the LVIA is based on first-hand observations during site visits and not on viewpoints and visualisations alone. Effects on visual receptors within Stoke by Nayland Parish are described in the Landscape and Visual row above.

Topic	Comment	National Grid's response
	formed Boxted Airfield site around the pylon TB026. This would significantly reduce the damaging impact of this section if the pylon route on (i) middle-distance views out of the National Landscape and (ii) the setting of the same.	

2.52 Stratford St Mary Parish Council

2.52.1 Table 2.52 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Stratford St Mary Parish Council [RR-3498]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.52 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	Stratford St Mary Parish Council wish to submit a report and concerns in response to the Planning Application for the Norwich to Tilbury power upgrade route submitted by National Grid	The Applicant responds to the detailed points raised by the Parish Council in this table below.
Key Legislation and Planning Policy	Development proposals affecting National landscapes Only local authorities or the Secretary of State can give permission for development in, or affecting, an National Landscapes. As a local authority, you must make sure that any proposals have regard for the purpose of conserving and enhancing the natural beauty of the National Landscapes, for example when: • adding utility services, like gas pipes and telecommunications cables	Noted.

Topic	Comment	National Grid's response
	• creating public access as part of rights of way improvement You can consult Natural England where development might have a significant impact. Read guidance on how to review planning applications in a protected area before you make a planning decision. You can use National Landscapes management plans to help: • shape local or neighbourhood plans • make decisions on development proposals	
Water environment	The Dedham Vale area affected by the proposal is a wide flood plain with water meadows and water courses and with valley sides framed by continuous tree lines along the ridges.	Flood risk in the Dedham Vale, including from the River Stour and its tributaries, has been characterised in 7.9 Flood Risk Assessment [APP-331] as part of its application for development consent. Interactions with the Stour floodplain during operation (and maintenance) of the Project have been avoided through design, with the river and its floodplain being crossed by an underground cable. This cable would be installed using a trenchless technique to reduce temporary construction impacts on the water environment in this location. 7.9 Flood Risk Assessment [APP-331] assesses the impacts of the Project during construction and operation (and maintenance), and identifies control and mitigation measures to prevent increases in flood risk. These controls and mitigation measures are detailed in and secured through inclusion within 7.2 Outline Code of Construction Practice (Revision C). The Flood Risk Assessment has been shared with the flood risk management authorities for review; agreement of the findings and conclusions are noted in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038].

Topic	Comment	National Grid's response
Alternatives	The scar caused by the trench across the valley and through the tree line will be there for the life of the line. There will also be regular unsightly access points along the route of the underground cables for inspection. These proposals are completely out of keeping with the National Landscapes and the National Parks policy especially as there are alternate routes available.	The Applicant is clear that relevant guidance allows for construction and installation within National Landscapes. The Applicant also carefully considered alternative corridors as set out in 7.18 2022 - Corridor and Preliminary Routeing and Siting study 2022 (CPRSS) [APP-356] , including corridors routeing around the National Landscape but considered these less preferred. The detailed route of the corridor has been developed with careful attention paid to routeing which is substantially through fields in use for arable cropping. Routeing through hedgerows has also been carefully identified to target existing gaps, where available. Appropriate mitigation including replanting has been incorporated.
Biodiversity, ecology and nature conservation	The trees can never be replanted as the trench cannot have planting over the top. The disturbed ground will take approximately 20 years to recover. There can be no price put on the preservation of the natural beauty.	Normal agricultural cropping can occur above underground cables, but it would not be possible to construct buildings and plant trees above them. Paragraph 4.8.70 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] refers to this aspect. In summary, we would expect normal agricultural cropping (grass, cereal, root and vegetables) to be resumed above underground cables. Uses involving support structures installed at depths presenting risk to the cables may also be able to continue by careful positioning of the structure/stake and it may also be possible to locally increase burial depth of cables. Replanting of hedgerows and establishment of scrub habitats would be acceptable, but it is not acceptable to replant trees nor establish buildings above the cable swathe.
Biodiversity, ecology and nature conservation	It is clear from reading the ecology reports that a thorough and full analysis of the ecology and environment in the Stour valley has not been carried out. It is very clear that National Grid and their consultants have no recognition of the significance of	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on ecology features. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period. The survey methods and extent of surveys are in line with best practice guidelines and were agreed with Natural England/Local Planning

Topic	Comment	National Grid's response
	the National Landscape or the environment in the National Landscape. These statements are backed up by the conclusions within the ecology reports which state that the valley is an unsuitable habitat for Otters and other endangered species and therefore no further research has been done. The residents regularly see otters and photographic and video proof of the local otter family on numerous occasions can be given as evidence.	Authorities as relevant, the findings of which have informed the design and approach to mitigation. The River Stour and the associated Stour Valley has been fully surveyed for both habitats and a range of protected species including water vole, otter, badger, bats and birds. 6.8.A13 Environmental Statement Appendix 8.13 - Otter and Water Vole Report [AS-039] confirms the presence of otter on the River Stour through both desk study records and following detailed surveys. A trenchless technique would therefore be used to underground the 400 kV cable beneath the River Stour at two locations, to ensure the river and associated bankside habitat are unaffected. There would also be no construction haul road crossing the River Stour with construction access to be obtained from either side. These embedded mitigation measures would ensure no impact to otter on the River Stour during either construction or operation (and maintenance). 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species (including otter) and mitigation measures as appropriate within the Stour Valley and the wider area. The Project has been designed to minimise effects on Dedham Vale National Landscape, including consideration of the Project within the National Landscape and its setting. 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] presents the assessment of effects of the Project on Dedham Vale National Landscape (DVNL). The assessment was undertaken taking into consideration the special qualities which describe important aspects of natural beauty in the DVNL. The Applicant considers that there will be significant adverse effects on the special qualities of the DVNL at construction, and that these will reduce to not significant at operation (and maintenance).
Biodiversity, ecology and nature conservation	Because of the unspoilt nature of the area protected species under the Wildlife and Countryside Act 1981 live and thrive. These include reintroduced Otters and Beaver,	The River Stour and the associated Stour Valley have been fully surveyed for habitats and a range of protected species; including water vole, otter, badger, bats and birds. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors.

Topic	Comment	National Grid's response
	particularly in the area of the power main. Local residents have video footage of the various Otter families using the meadows for hunting and playing. Other protected species include Badger, Bats, Plover, Water Voles, cuckoos, Reed Warblers, Nightingales, Owls, Red Kites, Marsh Harriers, Buzzards, Swans and Hares. All these have been recorded and are regularly seen by the locals and walkers. There is at least one known Badger sett which is on the direct line of the power main within the valley. There are numerous Bat species relying on the trees and the insects from the trees and grass lands in the valley. The Essex side of the river is a registered area for Greater Crested Newts.	6.8.A13 Environmental Statement Appendix 8.13 - Otter and Water Vole Report [AS-039] confirms the presence of otter on the River Stour through both desk study records and following detailed surveys. Beavers are known to have been reintroduced to East Anglia at discrete fenced release sites, however the closest release location is c.5 km from the Project. There are no records of free-living beavers within East Anglia. No evidence of beaver was identified within the Order Limits during the riparian mammal surveys. A trenchless technique will be used to underground the 400 kV cable beneath the River Stour at two locations, to ensure the river and associated bankside habitat are unaffected. There will also be no construction haul road crossing the River Stour with construction access to be obtained from either side. These embedded mitigation measures will ensure no impact to otter or other riparian mammals along the River Stour during either construction or operation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce impacts on otter, amongst other protected species, and mitigation measures as appropriate within the Stour Valley and the wider area. Stratford St Mary and the River Stour form breeding bird Survey Area 5 within 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [AS-030], identified as supporting the highest number of bird species of all survey areas, reflecting its size and the diversity of habitats present, including the River Stour, farmland, woodland and wetlands. Several bird species identified by local residents are supported by the survey findings. Cuckoo was recorded as a likely breeding Red-listed species, while nightingale and lapwing (plover) were identified as possible breeding and notable species. Birds of prey and wetland associated species (including marsh harrier, red kite, buzzard and swans) were recorded primarily as non-breeding or foraging birds associated with the river corridor. Overall, the surveys recorded eight Red-listed species as likely breeding, three Red-listed species as possible breeders, and twelve Amber-listed species breeding. Skylark occurred in the greatest breeding numbers, and this was the only survey area with confirmed breeding sedge warbler.

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		In this area, the cables will be buried underground. As such, there is no long-term collision or electrocution risk to birds. Any effects during construction are largely temporary and localised within the construction phase, due to the linear nature of the Project, with habitat to be reinstated. A full assessment of potential effects on birds is set out in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], with mitigation confirmed through 7.4 Outline Landscape and Ecological Management Plan (Revision D). Mitigation for breeding birds includes the following: • Where practicable, vegetation and habitat with potential to support nesting birds will be retained and avoided, with works timed outside the core breeding season (March–August). Where this is not possible, pre-construction nesting bird checks will be undertaken (within 24–48 hours of works) by a suitably qualified ecologist. If active nests are identified, species-appropriate exclusion buffers will be applied and works delayed until nests are no longer active. Enhanced buffers are applied for ground-nesting species such as lapwing and skylark • Temporary habitat loss will be reinstated post-construction in accordance with 7.4 Outline Landscape and Ecological Management Plan (Revision D) while permanent habitat losses will be mitigated through habitat creation and enhancement • Specific mitigation is also in place for Schedule 1 species, including licensed surveys, disturbance buffers, timing restrictions, and the provision of replacement nesting and roosting features (e.g. barn owl boxes, kingfisher mitigation), where required. Wintering bird surveys were also completed in the area which resulted in the identification of functionally linked land with the Stour and Orwell Estuaries Special Protection Area / Ramsar Site. Effects on these European Sites is presented within 5.3 Habitats Regulations Assessment Report [APP-082], with full wintering bird results presented in 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. The functionally linked land was shown to support lapwing and golden plover during the winter in the vicinity of the River Stour. This area is proposed for underground cabling. It was demonstrated at Stage 2 Appropriate Assessment of 5.3 Habitats Regulations Assessment Report [APP-082] that there is extensive alternative habitat for these species within the River Stour catchment and as the works are temporary at this location (with habitats reinstated following installation of underground cables), there

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		would be no adverse effects on the integrity of the Stour and Orwell SPA/Ramsar site. This conclusion was agreed with Natural England. Badger surveys have identified a range of active and inactive badger setts in the Stour Valley. Measures have been taken to avoid or minimise impacts on main badger setts where practicable, through careful routeing of the 400 kV underground cable and pinching of the limit of deviation. Where it has not been possible to completely avoid, mitigation measures have been proposed as set out within 7.4 Outline Landscape and Ecological Management Plan (Revision D). A draft badger licence has been prepared and submitted to Natural England, which sets out the anticipated impact and proposed mitigation. The Applicant is working with Natural England towards obtaining a Letter of No Impediment for badger and expecting receipt during the examination phase as shown within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. Detailed bat activity surveys have also been undertaken in the area. With the trenchless techniques to be employed at the River Stour, the impacts to the vegetation will be very limited and will have no impact on foraging and commuting bats along the River Stour. Full details of the surveys are presented within 6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036]. Impacts to great crested newts are to be mitigated for under District Level Licensing. A Great Crested Newt Impact Assessment and Conservation Payment Certificate has been obtained and countersigned by Natural England.
Biodiversity, ecology and nature conservation	The meadows act as nesting grounds for amongst other things swans and plover. Generally, each year, there are at least 20 pairs of Swans nesting just in the water meadows between Stratford St Mary and Higham and on the route of the cables. The Plover are finally making a recovery and there seem to be more of them in the last few years.	The water meadows between Stratford St Mary and Higham were fully considered within the Project's bird assessment. Lapwing (plover) was recorded within Stratford St Mary Survey Area 5 as a possible breeding Red-listed species, reflecting the suitability of wet grassland habitats. Swans and other wildfowl were recorded using the River Stour corridor, primarily for foraging and wintering rather than confirmed concentrated nesting at the densities described. The importance of the area for wintering and migratory birds, including wildfowl and waders such as teal, wigeon, pochard and snipe, was assessed through targeted Wintering and Passage Bird Surveys where there was potential for Functionally Linked Land. These surveys are reported in 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170] and were informed by a

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	Hares are also recovering and use the meadows and the arable fields on the main route for their homes. The meadows an extremely important habitat used by migratory birds during the winter and each year the valley gets large flocks of Teals, Pochard, Snowy Egret, Wigeon and Snipe. Native deer use the tree lined ridge as an east west migration corridor, both sides of the valley. All these facts prove that the National Landscape has allowed a delicate infrastructure for these rare species to survive and flourish. More importantly this has taken 50 years of careful husbandry to allow this to happen and this is all suddenly lost by an ill-conceived scheme through a protected area, all for short term monetary gain. There has been limited ecological assessment carried out and no attempt to mitigate	comprehensive desk study using over 10 years' bird records from the British Trust for Ornithology, RSPB and local records centres. Survey areas and species groups were selected following industry good practice guidance, including NatureScot guidance⁷⁷, and were agreed with Natural England and relevant local authorities (5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]). The assessments include wildfowl, waders, and herons and egrets, directly addressing the species referenced. Although this section of the Project does not include overhead lines, birds were assessed for disturbance, habitat loss and fragmentation associated with underground cable works, as set out in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] with mitigation confirmed through 7.4 Outline Landscape and Ecological Management Plan (Revision D). Mitigation for breeding birds includes the following: • Where practicable, vegetation and habitat with potential to support nesting birds will be retained and avoided, with works timed outside the core breeding season (March–August). Where this is not possible, preconstruction nesting bird checks will be undertaken (within 24–48 hours of works) by a suitably qualified ecologist. If active nests are identified, species appropriate exclusion buffers will be applied and works delayed until nests are no longer active. Enhanced buffers are applied for groundnesting species such as lapwing and skylark. • Temporary habitat loss will be reinstated postconstruction in accordance with 7.4 Outline Landscape and Ecological Management Plan (Revision D) while permanent habitat losses will be mitigated through habitat creation and enhancement. • Specific mitigation is also in place for Schedule 1 species, including licensed surveys, disturbance buffers, timing restrictions, and the provision of replacement nesting and roosting features (e.g. barn owl boxes, kingfisher mitigation) where required. Functionally linked land with the Stour and Orwell Estuaries Special Protection Area / Ramsar Site was identified during wintering bird surveys. Effects on these European Sites is presented within 5.3 Habitats Regulations Assessment Report [APP-082], with full wintering bird results presented in 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. The functionally linked land

⁷⁷ NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*.

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	any harm to the species affected. What surveys have been carried out have such wide areas to cover that they have little hope of complying with any of the legal requirements. Any other form of application in the same area would fail to pass validation on the extent of survey work carried out. We strongly recommend a full two year survey of the valley and its ecology are prepared prior to a full submission. There are significant trees on the proposed route of the cable. These are mostly very old Oak trees.	was shown to support lapwing and golden plover during the winter in the vicinity of the River Stour. This area is proposed for underground cabling. It was demonstrated at Stage 2 Appropriate Assessment of 5.3 Habitats Regulations Assessment Report [APP-082], that there is extensive alternative habitat for these species within the River Stour catchment and as the works are temporary at this location (with habitats reinstated following installation of underground cables), there would be no adverse effects on the integrity of the Stour and Orwell SPA/Ramsar site. This conclusion was agreed with Natural England. The surveys undertaken are proportionate and consistent with best practice, distinguishing between breeding, wintering and passage use of the area. On this basis, a further two-year survey is not considered necessary for the assessment of impacts on birds. Following the implementation of sufficient mitigation it was concluded that there would be no significant effects to both breeding and wintering birds. National Grid has sought to minimise impacts upon trees and hedgerows through careful route selection and siting of the Project. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. 7.2 Outline Code of Construction Practice (Revision C) includes measures to ensure that tree/hedgerow removal is reduced as far as practicable through the detailed design process.
Hydrology Land Drainage and Flood Risk	The River Stour has been extensively studied and recorded by the Department for Environment Food and Rural affairs and they very helpfully provide details of catchments and ecology on their web site. From this web site the catchment area for the River Stour and all its tributaries	The hydrology and ecology of the River Stour has been characterised using data from a range of sources, as detailed in 7.10 Water Framework Directive Assessment [APP-332], which included both desk-study sources, including those published by Defra, and field surveys. The River Stour is included as a receptor in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] which presents an assessment of the potential for the Project to impact on the Stour during construction and operation (including maintenance). The floodplain of the Stour has been defined using outputs from an Environment Agency flood model, as well as latest mapping from the Environment Agency, updated in 2025. Impacts on the floodplain are assessed in 7.9 Flood Risk Assessment [APP-331] which identifies control and mitigation measures to prevent

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	upstream from the confluence of the River Brett at Higham in Suffolk as tabled below. The river and its tributaries are reported as having good to moderate Ecology with particular attention in these reports given to fish and invertebrates. The catchment area for the river reflects the broad and flat valley bottom/flood plain to the river but also the numerous side valleys and tributaries draining in and the area is clearly significant and equates to a considerable amount of water. The flood plain to the west of Stratford St Mary is particularly broad and covers a significant area. At Stratford St Mary the River Stour make a significant meander to the south cutting into the Langham estate hill side at the junction of the A12 at the Talbooth Resturant. .Stratford St Mary sits on historically higher ground which, from the ages of the listed properties in the village, has kept them free of flood waters over the centuries.	increases in flood risk. These controls and mitigation measures are detailed in and secured through inclusion within 7.2 Outline Code of Construction Practice (Revision C).

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	There is a low area between Gun Hill and Stratford St Mary of approximately 500m where the water has to pass from west to east. The river generally passes under the village road and the A12 adjacent to the Talbooth Resturant but in flood has two further bridges and a series of metal pipes to relieve the pressure further north of this leading towards the start of the houses. Locals call this area the Island. Approximate area subject to annual flooding with the route of the underground main indicated. The river and its flood plains adjacent to the village are bunded to allow for the increase in the depth of the flood water. There are lock gates and a controlled weir at the old mill site but these are quickly by passed in time of flooding as the water goes around on the fields of the flood plain. The flood prevention measures are generally brimming during flooding and in the worse cases water does breach.	

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Hydrology Land Drainage and Flood Risk	During 2023 the village received a severe flood warning from water down the River Brett only and staff of the Environment Agency and Babergh Environmental Team maintained a 24-hour watch over the weir, and the flood barriers. It can be clearly seen therefore that Stratford St Mary forms the neck of a very large bottle for the river and its flood plains. The significance for the proposed underground cables is that the area where these are proposed has a significantly high flood risk factor and forms a significant flood relieving safety net for local communities. The extent of flooding and high water is recorded at Langham Pumping station in the River Levels link below, this does not take into account the confluence of the Box and the Brett which join after this data point. https://riverlevels.uk/river-stour-stoke-by-nayland-langham https://riverlevels.uk/suffolk-stoke-by-nayland-higham-rqs We understand from local land owners that brief surveys of their	The flooding history of the parish is recognised in 7.9 Flood Risk Assessment [APP-331], and this information is supplemented by the Applicant's Deadline 2 submission 8.10.2 Flood Risk Assessment Technical Note [REP2-031], which provides more recent flood history data, including linked to Storm Babet in October 2023. Flood risk to the Project in the vicinity of the River Stour, both from the river, as well as from surface and groundwater sources, has been appraised using outputs from an Environment Agency flood model, as well as latest mapping from the Environment Agency, updated in 2025. The assessments have been shared with the flood risk management authorities for review; agreement of the findings and conclusions are noted in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038]. Control and mitigation measures to manage the waterlogged conditions that are known to occur during seasonal flooding are detailed in and secured through inclusion within 7.2 Outline Code of Construction Practice (Revision C).

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	land, including significant areas of flood plain have been carried out but the surveyor was unwilling to visit during the annual floods which can be for 30 plus days during the winter period. The ground also remains wet and boggy for significantly more days after these floods.	
Hydrology Land Drainage and Flood Risk	Any trenching and cabling would need to be designed to ensure that they do not impede the flood waters or divert flood waters away from their only root (sic) to the sea. The officials are also drawn to an event in late 1970's where the trenching and installation of a gas main across the valley caused significant flooding and damage to properties in the area. We understand that the trench and cables will have to be left open for three years whilst the rest of the installation is completed so that it can all be tested prior to back filling. During this time there will be multiple flood weeks and days when the cables, equipment and	As secured by commitment W06 within 7.2 Outline Code of Construction Practice (Revision C) cables will be laid at least 1 m below the hard bed level of the River Stour and will remain at or below this level for not less than 3 m from the brink of the riverbank. This will prevent any impediment to the flow of floodwaters. The Applicant's preferred approach for this Project is to use ducting, as stated in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], paragraph 4.8.68. Typically, two trenches would be excavated at one time; ducts would be placed within the trenches and then backfilled. The Main Works Contractor(s) would typically complete the works in segments. To open and reinstate all six trenches in a 100-metre section would typically take two weeks. Localised excavations at joint bays would be required along the underground cable route and these may remain open between the duct installation and the subsequent cable installation. The duration these localised excavations stay open would depend on their position along the route and the phasing of the works. However, these openings are limited to specific locations, and the main trenches would be backfilled once the ducts are installed, preventing long stretches of open excavations. There may be locations where ducting is not the best solution, such as where topography limits installation techniques. In such cases, standard open cut methods may be employed (i.e. direct burial). The trenches in these locations would need to remain open for longer. Where localised sections of direct buried cables are required, the trench excavations would be open for a duration of months rather than years.

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	excavation with be under water and open to damage. During these three years there is also a considerable risk that the trench, cables and spoil will divert the water flow across the fields and cause additional flooding.	
Transport and Traffic	The route of the proposed main is reasonably secluded and not served by good or large roads. There is also the restrictions within Stratford St Mary of the access routes on and off the A12 and the narrowness of the main street and side roads. Stratford St Mary dates back to the Roman period and as such is an ancient settlement and river crossing. The village historically has narrow streets, close packed housing along the main streets and many Grade 2, two grade 2 star and one Grade 1 listed buildings. The alluvial flood plain means that the foundations are shallow and because of these heavy traffic movement causes	The Applicant has developed a construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. The haul roads are proposed to be constructed adjacent to the underground cable corridor or to provide a continuous access route between overhead line pylons. Haul roads enable materials and the workforce to be moved along the overhead line and underground cabling construction corridor minimising the use of public highways, avoiding (where possible) sensitive areas such as villages, schools and minor roads. There are no proposed Primary Access Routes through the village of Stratford St Mary and therefore, traffic is not proposed to route through Stratford St Mary including School Lane/Higham Road (detailed in Figure 1 Page 16 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]). The closest Primary Access Route is to the south of Stratford St Mary along Ipswich Road from the A12. Each Primary Access Route and Abnormal Indivisible Load route has been reviewed and a package of mitigation measures has been developed covering all of the Primary Access Routes and Abnormal Indivisible Load routes to enable two-way HGV movements. An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is so that potential

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	damage internally and externally to the buildings.	'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than a day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or potential structural damage, can be avoided with the use of Best Practicable Means. This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments, specific mitigation measures would be identified if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306])). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post- condition surveys to be conducted in such situations, and a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Stratford St Mary. The Project will not result in any substantial harm to designated heritage assets. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The

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		Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording.
Transport and Traffic	The map would indicate routes off the A12 from Colchester and Ipswich direction, down school lane, to the route of the proposed main. The map scale is very misleading. The thickness of lines suggest that the B1029 leading past Hall Farm continues down School Lane and Higham Road as a two lane highway. This is not the case.	The Applicant has developed a construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. The haul roads are proposed to be constructed adjacent to the underground cable corridor or to provide a continuous access route between overhead lines pylons. Haul roads enable materials and the workforce to be moved along the overhead lines and underground cabling construction corridor minimising the use of public highways, avoiding (where possible) sensitive areas such as villages, schools and minor roads. There are no proposed Primary Access Routes through the village of Stratford St Mary and therefore traffic is not proposed to route through Stratford St Mary including School Lane/Higham Road (detailed in Figure 1 Page 16 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]). School Lane and Higham Road are noted as proposed diversion routes within Section C Page 9 of 2.5 Access Rights of Way and Public Rights of Navigation Plans [APP-035]. Diversion routes where required (as a result of a road closure) will adopt the principle of following a road of similar standard or higher, where practicable and available. The lines shown on these plans indicate the proposed diversion routes and whether the diversion routes are used for one or two road closure Traffic Regulation Orders (TROs). Two blue parallel lines indicate that that road will be used for two separate closure TROs, not that the road is a two-lane highway.
Transport and Traffic	Below is an extract of the School Lane section together with photographs of Stratford and	The Applicant has developed a construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B) . Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes

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	Higham road width, obstructions and road condition. [Map: Detailed map of school lane] [Photo: The turning off Upper Street into School Lane & notices about single track road.] [Photo: School Lane Outside Strickmere estate. (Please note bicycle in the lane for scale)] [Photo: School lane looking back towards the village] [Photo: Sharp bend & narrowing at junction of School lane, Billys lane & Higham Road] [Photo: Note mini skip lorry outside Spring Farm] [Photo: Dangerous junction at high Road outside Lowe Hill House] [Map: Map extract highlighting the route from the south into the village] [Photo: Tight bend & corner at junction of Upper Street, Lower Street & Higham Road.] [Photo: The tight bend and steep hill at the bottom of Gun hill]	to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. The haul roads are proposed to be constructed adjacent to the underground cable corridor or to provide a continuous access route between overhead lines pylons. Haul roads enable materials and the workforce to be moved along the overhead lines and underground cabling construction corridor minimising the use of public highways, avoiding (where possible) sensitive areas such as villages, schools and minor roads. There are no proposed Primary Access Routes through the village of Stratford St Mary and therefore traffic is not proposed to route through Stratford St Mary including School Lane/Higham Road (detailed in Figure 1 Sheet 16 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]). School Lane and Higham Road are noted as proposed diversion routes within Section C Page 9 2.5 Access Rights of Way and Public Rights of Navigation Plans [APP-035]. Diversion routes where required (as a result of a road closure) will adopt the principle of following a road of similar standard or higher, where practicable and available.
Noise and Vibration	It must also be necessary to highlight Stratford St Mary Primary School, Orchard Barns	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] . The assessment considers the additional sensitivity of receptors such as schools and nurseries. The assessment indicates that

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	Nursery and a well used playing field which are all in close proximity to the proposed cable route and would be disrupted by noise from the site and traffic would pose a severe risk to the children and babies.	significant adverse effects are not expected at the locations listed, where suitable mitigation measures are incorporated into the works. The contractors are committed to employing such measures as per the commitments detailed in 7.2 Outline Code of Construction Practice (Revision C). Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments, specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306] submitted as part of the Development Consent Order (DCO) application. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] assesses the potential effect on community facilities, including education premises, during construction and operation arising from the Project. No significant adverse effects have been identified for community facilities located in Stratford St Mary Parish Council. The Applicant has developed a construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. The Applicant is not proposing a Primary Access Route on Upper Street or Strickmere surrounding the primary school.
Transport and Traffic	National Highways had until 10 years ago a policy of diverting traffic through the village. They were forced to change that policy when the question of Health and Safety Risk Assessment was raised with them for the general public. The same question would need to be	A short-term temporary closure of Higham Road (between points SM-C-026 and SM-C-027) and Green Lane (between points SM-C-024 and SM-C-027) are proposed during construction between as shown on Sheet 9 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035] . Full road closures are expected to be for no more than four weeks and will require a diversion. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. A full point-to-point diversion on public roads will be provided so that all vehicles that will usually and legitimately use a road can continue to use it to complete their journey. The means of

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	raised for the village roads and the population.	access will be communicated to the relevant highway authorities and emergency and essential services. The temporary diversion routes associated with the temporary closures of Higham Road and Green Lane are set out on Sheet 9 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035]. The Project is proposed to cross the A12 in two locations. To ensure the safety of road users the Applicant would install safety netting across the road at these locations, which would require very short, temporary closures of the A12 for up to approximately four hours. The Applicant is proposing to undertake the temporary closures overnight to minimise the disruption. The Applicant will coordinate with local authorities, communities and highways agencies and work to agreed traffic management plans to ensure any disruption is kept to a minimum.
Socio-economics Recreation and Tourism	The undisturbed and quiet beauty of the valley, the village and the surrounding area is the very reason for the National Park listing and because of this it attracts huge numbers of tourists into the area resulting in a buoyant economy for the various traders. The area attracts walkers, runners, nature lovers, fishermen, boaters, painters and all sorts of other outdoor pursuits. These all result in additional revenue within the area and for businesses. The village has a launching point for kayaks and canoes etc and there are at least two	Through the routeing and siting exercise the Applicant has sought to reduce as far as practicable impacts on businesses, recreation and tourism assets. Reduction in these impacts would be considered during the detailed design process. Effects on local businesses, recreation and tourism assets are presented within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. No significant adverse effects have been identified for Socio-economics, Recreation and Tourism receptors within Stratford St Mary Parish Council in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].

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	organisations, excluding the Stour Valley Trust, that launch weekly with paid groups from the village. In Stratford there are two public houses, a garage, a post office and a farm shop all of which rely on passing tourist trade for their ongoing health of their businesses. One local farmer directly affected by the underground main relies on the revenue from a glamping site, horse riding and stabling and clay pigeon shooting.	
Air quality and emissions	No account seems to have been taken of the pollution to the valley and the environment. The excavation will require large amounts of mechanical plant which will pollute the air and produce significant noise pollution. The potential for pollution to the river and the other water bodies being crossed has not been taken into consideration.	Volume 6: Environmental Statement [APP-123 to APP-287] has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the Development Consent Order (DCO) application, including 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B), 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Regarding air pollution from mechanical plant, GG19 of 7.2 Outline Code of Construction Practice (Revision C) is a commitment to use certain Euro standards for

Topic	Comment	National Grid's response
		different types of vehicle and plant on the Project, minimising emissions to air where possible. The potential for degradation of the water quality of the River is assessed in 6.12 Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk [APP-221], which concludes there would be no likely significant residual effects, on the basis of the control and mitigation measures secured through commitments within 7.2 Outline Code of Construction Practice (Revision C).
Biodiversity, ecology and nature conservation	In conclusion the scheme for dissecting the Nation Park has been badly researched and thought through. There seems to be only limited and unfounded assumptions made during brief research into the area, habitats, wild life and the annual cycle. As residents who choose to live in this environment, we are far more aware of what they have and can report accurately and raise their concerns. This is backed up by national reports and research all of which seems to have been ignored. It seems clear to the Parish that National Grid have looked at the shortest route from A to B with no thought to what this would cross, the significance of the land being altered or the legal security that this land and the environment in it have.	Through routeing and siting, the Applicant has sought to reduce impacts on the environment as far as practicable, taking on board feedback at different stages of the Project. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in Volume 6: Environmental Statement [APP-123 to APP-287] that accompanies the application for development consent. The Environmental Statement identifies and assesses the likely significant effects on the environment resulting from construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual, and Historic Environment) are presented in the relevant Environmental Statement chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or reduce risks to habitats and species. In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10% greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Full details are presented within 7.1 Biodiversity Net Gain Report [APP-299]. An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The assessment concludes that there would be significant effects on the

Topic	Comment	National Grid's response
	We would recommend that the consultation is withdrawn, and a more thorough consideration be given to the National Landscape and the impact upon it. If the impact cannot be adequately mitigated or better still avoided all together then alternate solutions should legally be followed.	special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant's consideration of its duty in relation to the Project, to seek to further the purpose of the National Landscape, which is to '<i>conserve and enhance natural beauty</i>' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].

2.53 Suffolk Constabulary

- 2.53.1 Table 2.53 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Essex Police and Suffolk Constabulary **[RR-3519]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.53 Comments and National Grid's response

Topic	Comment	National Grid's response
N/A	The Norwich to Tilbury High Voltage Reinforcement Project Relevant Representation Under Section 56 of the Planning Act 2008 Introduction 1. This document sets out the Essex Police (EP) and Suffolk Constabulary (SC) joint initial response to the Planning Inspectorate's decision to accept an application for Examination in respect of the Norwich to Tilbury High Voltage Reinforcement Project (the Project). 2. SC and EP are the relevant Police Authorities with a status as 'Prescribed Consultees' pursuant to The Infrastructure Planning (Applications: Prescribed Forms & Procedure) Regulations 2009 and have registered as 'Interested Parties' in this DCO process. 3. This document follows initial representations at the statutory	National Grid notes EP and SC's comments.

Topic	Comment	National Grid's response
	consultation stage in July 2024 that were submitted by SC, which raised areas of project interest and concern (PIC). SC/EP have engaged, and continue to engage, with National Grid (NG) to address areas of PIC from a project impact and service capacity/demand perspective 4. The representation of EP and SC seeks to ensure that EP and SC's PIC are adequately addressed throughout the examination process. Moreover, EP and SC consider that it is essential that appropriate mitigation and management measures are secured to address EP and SC's PIC, whether by way of requirements within the DCO or a planning obligation. Accordingly, until adequate mitigation is secured in respect of these concerns, EP and SC raise a Holding Objection to the Project pending satisfactory resolution of these matters.	
Transport and Traffic	5. EP and SC's primary source of concern relates to the need for police escorts to accompany	The Applicant is working closely with Essex Police and Suffolk Constabulary to confirm the on the public highway that may require escort during the Project's construction, as well as additional policing needs and lead-in times.

Topic	Comment	National Grid's response
	deliveries of abnormal indivisible loads (AIL) and the consequential pressure on EP and SC's resources - in particular, ensuring that the need for police escorts does not give rise to a negative adverse significant effect on Local and Neighbourhood Policing (LP/NP) and Roads Policing (RP) who would primarily police the construction phase impacts.	To date the Applicant has shared with the Police forces proposed AIL routes, indicative volumes of AIL movements and indicative programme dates. The Applicant has held regular meetings with the Police forces and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts.
Socio-economics, recreation and tourism	6. EP and SC are operating at capacity - any additional demand for police, community safety and cohesion resources arising from the Project would require mitigation funding. In addition, provision for funding needs to be provided to ensure that the increased demand for policing does not result in a negative adverse significant effect with respect to community safety and cohesion.	The Applicant considers that no case has been made that a material residual safety or health impact is likely or justifies any request for a Section 106 agreement that meets the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. The health and wellbeing assessment presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] sets out which health determinants have been assessed for both the construction and operation (and maintenance) phases. This is based on an understanding of the Project and likely nature of effects, whether a pathway exists between the health determinant and the population, and likely receptors present. Community safety has been assessed in relation to road safety and potential impacts associated with changes in traffic on the local road network during construction; with appropriate mitigation as outlined in 7.3 Outline Construction Traffic Management Plan (Revision B), a negligible (not significant) level of health effect has been identified. Community cohesion is considered as part of the assessment of potential impacts on mental health and wellbeing during the construction phase. Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes that certain sensitive groups such as older people may feel more vulnerable as a result of the presence of construction workers/activity in an area but that this will be managed through appropriate community liaison. No requirements for additional demand for police, community safety or cohesion resources have been identified.

Topic	Comment	National Grid's response
Consultation	7. EP and SC intend to work with NG through a Statement of Common Ground (SoCG) process to address and overcome the areas of PIC	The applicant has engaged with and will continue to engage with EP and SC to progress the respective Statements of Common Ground [REP1-073, REP1-074] , to be submitted to the ExA at the appropriate deadlines.
Traffic and Transport	8. Following a review of the DCO Application documentation, EP and SC consider that the following matters form areas of PIC: The impact of AIL's on highways, traffic & localities, both in isolation and in terms of the cumulative impact of other NSIPs; The impact of AIL's on police resources, demand and training, both in isolation and in terms of the cumulative impact of other NSIPs;	The Applicant has engaged with and will continue to engage with EP and SC regarding the planning of AIL movements in order to manage impacts to the highway networks, traffic and localities. The impact on Police resourcing is acknowledged, and engagement to-date has highlighted the importance of appropriate lead-in times. As details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, the Applicant will continue to support the Police Forces' planning through information exchanges and further engagement. An assessment of intra-project cumulative effects, undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297], is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281], which also assesses inter-project cumulative effects from clusters of other developments. Furthermore, understanding impacts and past experience of abnormal load management from other NSIPs is an area which has been the subject of engagement to-date and is something the Applicant would welcome further discussion on, where applicable.
Socio-economics, recreation and Tourism	Impact on crime, community safety, cohesion and policing relating to primary & secondary construction site compounds; Construction phase incident response/ management and community impacts –protest related activity,	The Applicant has developed 7.3 Outline Construction Traffic Management Plan (Revision B), where it is noted that The Main Works Contractor(s) will develop an Incident Management Plan in agreement with the blue light services to develop a procedure for any incidents on the road network proposed to be utilised by the Project. The Applicant has engaged with the Police, Fire and Ambulance services, the local highway authorities and National Highways and has assessed the impact of the Project on community safety from both a health and wellbeing point of view and a traffic and transport point of view. The Health and Wellbeing assessment (refer to 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]) found that while several locations have been

Topic	Comment	National Grid's response
		identified where potential community safety (traffic) impacts may occur, the magnitude of effect is likely to be low. Considering proposed mitigation, a negligible (not significant) health effect is anticipated during construction for the general population and vulnerable groups. Construction compounds will be secured in accordance with the Main Works Contractor(s)'s Security Plan Risk Assessment and will generally include double clipped Heras fencing and Perimeter Intruder Detection (PIDs) to pick up movement. Manned security will be provided if deemed necessary. For dispersed worksites, such as ground investigation sites, contractor vehicle and person access to each worksite will be controlled by the Main Works Contractor(s) or relevant subcontractor(s) establishing demarcation fencing/barriers around working areas, such as exploratory holes. Where there are unattended plants, the fenced area will be locked, and cab guards secured. This will generally comprise double clipped Heras fencing, and the use of PIDs may occur overnight if deemed necessary. Further details on the security arrangements at construction sites will be confirmed as the detailed design is progressed and a security plan is fully developed by the Main Works Contractor(s). 6.16 Environmental Statement, Chapter 16 – Traffic and Transport [APP-271] concludes that the overall residual effects on road user safety from the construction phase would be temporary, short-term, and the level of effect slight adverse and therefore not significant, considering embedded and additional mitigation. The Applicant and Main Works Contractor(s) will continue to engage with EP, SC and other relevant stakeholders on impact on crime, community safety, cohesion, policing relating to primary and secondary construction site compounds, construction phase incident response/management and community impacts – protest related activity.
Traffic and Transport	[...]wilful obstruction of highway and Road Traffic Collisions (RTC's);	The Applicant and Main Works Contractor(s) will engage with EP and SC on the potential impacts of wilful obstruction of the highway and road traffic collisions and welcomes a discussion on any specific locations that EP and SC wish to highlight.
Traffic and Transport	Incident response to be managed through a Security Partnership Working Group	The Applicant will consider the request for a Security Partnership Working Group (SPWG) during the construction phase and will engage with EP and SC accordingly.

Topic	Comment	National Grid's response
	(SPWG) during the construction phase - terms of reference, membership/ and governance arrangements to be agreed; and	
Socio-economics, Recreation and Tourism	Population increase/ construction workers – related to community safety, cohesion and wellbeing.	The Applicant is a responsible developer who has sought to engage with local communities, to understand potential issues and concerns as they relate to the construction and operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant acknowledges that certain population groups such as older people may feel more vulnerable as a result of the presence of construction workers/activity in an area. This is included in the assessment of potential impacts on mental health and wellbeing during the construction phase as set out in Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], which identifies social inclusion as being one of four protective factors for mental wellbeing. The assessment notes that dissemination of information to local communities during the construction period via the Project website can play a valuable role in reassuring people about activities that are ongoing; 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] sets out mechanisms, such as a Project helpline and email address, that residents can use to report issues or concerns relating to the Project during construction, which can help promote social cohesion.
Traffic and Transport	9. As stated above, the areas of PIC require mitigation/ management measures to be identified and secured through DCO Requirements and/or a Planning Obligation. We consider that without proper mitigation in place, a range of significant adverse effects arise as a result of the Project. 10. EP and SC intend to work with NG through a SoCG	The Applicant has prepared draft Statement of Common Ground (SoCG) documents with Essex Police and Suffolk Constabulary (at the request of the Planning Inspectorate) for Deadline 1. 8.3.3 Draft Statement of Common Ground – Essex Police (Final Issue A) [REP1-074] and 8.3.2 Draft Statement of Common Ground – Suffolk Constabulary (Final Issue A) [REP1-072] outline the areas of agreement and any remaining points of discussion between National Grid, Essex Police and Suffolk Constabulary. A record of Engagement History between National Grid and the two police forces is captured in Chapter 4 of their respective SoCGs (including meetings that took place during the pre-application process). These documents will continue to be revisited with Essex Police and Suffolk Constabulary throughout the examination process and updated, with the aim of reaching agreement in all matters raised between the parties through continued dialogue and additional meetings.

Topic	Comment	National Grid's response
	process to address and overcome the areas of PIC. 11. In particular, EP and SC consider that the following matters will be subject to further discussion by way of a SoCG; • Confirmation of Ports of Origin and routes for materials for the Project requiring police escorts; Numbers and dimensions of ALLs - allowing for appropriate modelling of police demand; • Quantum of mitigation required to offset this demand to be determined; and • The precise means in which mitigation is to be secured, whether by way of DCO Requirements or a Planning Obligation.	Essex Police and Suffolk Constabulary will have the opportunity to raise additional matters, such as those listed in their relevant representations, during these anticipated meetings.
Planning Policy	12. A scheme overview and construction phase summary are included in Annex 1 and Annex 2 respectively. 13. A letter to the National Grid (Norwich to Tilbury) Project Director dated 25 November 2025 emphasising the need for outstanding information on the	Noted, and the annex documents are acknowledged. The Applicant notes Essex Police and Suffolk Constabulary's comments and is considering their request whilst mindful of its regulatory duties. The Applicant has prepared draft Statement of Common Ground (SoCG) documents with Essex Police and Suffolk Constabulary (at the request of the Planning Inspectorate) for Deadline 1. 8.3.3 Draft Statement of Common Ground – Essex Police (Final Issue A) [REP1-074] and 8.3.2 Draft Statement of Common Ground – Suffolk Constabulary (Final Issue A) [REP1-072]. These PICs are captured as key matters for discussion and agreement within those SoCGs.

Topic	Comment	National Grid's response
	AIL Strategy to be made available to the Joint Forces without delay, is included at Annex 3 Mitigation & Management Measures – Parameter Tables 14. A 'without prejudice' list of proposed mitigation and management measures is outlined in the Parameter Tables below, subject to further discussion and engagement with NG. 15. The Joint Forces approach is consistent with Government policy set out in the Department for Energy Security & Net Zero Overarching National Policy Statement for Energy (EN1) November 2023. 16. In particular, EN-1 identifies traffic and transport, including abnormal loads generated during the construction phase, as an impact where the Secretary of State recognises the need for appropriate mitigation to ensure satisfactory arrangements - in consultation with network providers and the responsible police force. 17. The Joint Forces therefore expect this approach to be	

Topic	Comment	National Grid's response
	reflected in the identification and securing of appropriate developer funded police resource measures, as outlined in the parameter tables below.<i>[see RR for tables: Mitigation and Management Measures – Parameter Table 1: Abnormal Indivisible Loads (AIL's) Mitigation & Management Measures – Parameter Table 2: Other Service Considerations]</i>	
N/A	Concluding points 18. Essex Police and Suffolk Constabulary (Joint Forces) are Prescribed Consultees & have registered as Interested Parties in the DCO process. 19. Areas of PIC to the Joint Forces remain unresolved and a Holding Objection is raised. 20. The key areas of PIC relate to the significant impact on the Joint Force service capacity/ demand arising from the following; • Confirmation of Ports of Origin and routes for materials for the Project requiring police escorts;	The concluding points are acknowledged and not responded to individually here, given the detailed responded provided above to the main body of the RR.

Topic	Comment	National Grid's response
	• AIL movements and related highway disruption and management, including cumulative impact of NSIP's on localities; • The impact of AIL's on police resources, demand and training, both in isolation and in terms of the cumulative impact of other NSIPs; • Construction phase incident response/management, community impacts, protest related activity, wilful obstruction of highway, RTC's; • Construction worker impact on community safety, cohesion and wellbeing; • Impact on crime, community safety and policing relating to primary and secondary construction site compounds. 21. Appropriate mitigation and management measures are required to address the impacts arising including; • Funding for a bespoke AIL solution costed against the nationally recognised National Police Chief Council Special Police Service	

Topic	Comment	National Grid's response
	(NPCC SPS) rates – to secure a commensurate uplift in vehicles, equipment and back-office support for the officers; • Incident Response and Management Plan and Security Partnership Working Group (SPWG) during the construction phase; • Dedicated National Grid Community Liaison Officer to act as a key interface between the project, local communities, and emergency services; • Transport, Community Safety and Cohesion Working Group (TCSCWG) during the construction phase; • Schedule of home - based and non home - based workers, along with appropriate supporting information; • Designing Out Crime prevention measures; • Mitigation measures to be secured via DCO Requirement(s) and a Planning Obligation;	

Topic	Comment	National Grid's response
	22. It is of key importance to receive appropriate data from NG to assist ALL modelling in a timely manner, as an appropriate lead in time is required to 'stand up' increases in officer capacity to factor in recruitment, training and deployment of resources to enable existing capacity levels to be maintained at all times. 23. The approach being taken by the Joint Forces is consistent with the approach taken to other NSIP and large developments within Essex/Suffolk - it reflects planning process best practice and policy for mitigating traffic and transport impacts set out in the Department for Energy Security & Net Zero Overarching National Policy Statement for Energy (EN1) November 2023. 24. The Joint Forces look forward to working with NG to resolve the areas of PIC, following which the Holding Objection can be lifted; 25. A Statement of Common Ground process is envisaged to inform the examination stage of the Project.	

2.54 Swainsthorpe Parish Council

2.54.1 Table 2.54 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Swainsthorpe Parish Council [RR-3585]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.54 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	Swainsthorpe Parish Council supports the Essex Suffolk Norfolk Pylons action group. We are writing to formally object to the National Grid Norwich to Tilbury Pylons Development Consent Order.	The Applicant notes the respondent's feedback and will address specific comments made below.
Cumulative Effects	Construction of the pylons would begin on the boundary of our village at the Norwich South Substation. Swainsthorpe has recently been burdened by the increase in pylon height as the original pylons have been upgraded with increased capacity. We now have to contemplate the prospect of the doubling of the number of pylons across our village. At present Swainsthorpe is dealing with the construction of a 200 acre solar farm with its additional BESS construction and cable route. Added to this we have three	Swainsthorpe Parish is within South Norfolk District and is located within Section A of the Project. An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of 1 April 2025. The 200-acre solar farm, 'Land North And South Of Brick Kiln Lane Swainsthorpe Norfolk', has been considered within the inter-project cumulative assessment, referred to as SN3 within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. It is concluded that a moderate adverse and significant effect could not be ruled out in relation to construction and operation (and maintenance) phases for historic environment and landscape and visual, and major adverse and significant effects could not be ruled out for agriculture and soils. Hornsea Project Three has been considered within the inter-project cumulative assessment, referred to as DCO1 within 6.17.A3 Environmental Statement Appendix

Topic	Comment	National Grid's response
	more BESSs, the Hornsea 3 underground cable installation, associated converter station and potentially the Sheringham Shoal and Dudgeon extension project. The Substation itself is set to double in size which will increase the adverse visual impact on our village. The cumulative effect of all of these projects is unacceptable, it is ruinous to our wild life, our rural landscape and our communities.	17.3 - Inter-Project Cumulative Effects [APP-284]. It is concluded that a moderate adverse and significant effect could not be ruled out in relation to construction and operation (and maintenance) phases for historic environment and landscape and visual, and major adverse and significant effects could not be ruled out for agriculture and soils. Sheringham and Dudgeon Extension Projects have been considered within the inter-project cumulative assessment, referred to as DCO6 within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. It is concluded that a moderate adverse and significant effect could not be ruled out in relation to the construction phase for landscape and visual, and major adverse and significant effects could not be ruled out for the construction and operation (and maintenance) phases for agriculture and soils. Since 1 April 2025, the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into the Examination (as appropriate).
Landscape and Visual	The National Grid project proposes overhead high voltage lines which are unsightly and intrusive.	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
		The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Swainsthorpe Parish Council are set out under Visual Receptor Areas (VRAs) A1, A2, A3 and A4 in paragraphs 13.4.1 to 13.4.48 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].
Alternatives	Underground cables or offshore cables would surely be a more environmentally acceptable solution. We feel that this project is unacceptable to our villages and communities when more sustainable solutions exist. We urge the Planning Inspectorate to reject this Development Consent Order.	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

2.55 Tacolneston Parish Council

- 2.55.1 Table 2.55 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Tacolneston Parish Council [RR-3597]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.55 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	Tacolneston Parish Council, representing the residents of Tacolneston, wishes to formally register its strong and unequivocal objection to the proposed development of the East Anglia GREEN 400kV overhead line (Norwich to Tilbury Pylons) that will affect our parish and the wider Norfolk countryside.	Noted.
Landscape and Visual Health and Wellbeing	Our objection is based on the overwhelming and irreparable harm this development will inflict upon the natural environment, the visual amenity of the landscape and the well-being of our community.	The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure. Effects on visual receptors within Tacolneston Parish Council are set out under Visual Receptor Areas (VRAs) A5 and A6 in paragraphs 13.4.49 to 13.4.71 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Tacolneston Parish Council are set

Topic	Comment	National Grid's response
		out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under Ashwellthorpe Plateau Farmland Landscape Character Area (LCA) in paragraphs 13.3.81 to 13.3.96 and Tas Tributary Farmland LCA in paragraphs 13.3.111 to 13.3.125. The Applicant recognises that the Project has the potential to impact the wellbeing of Tacolneston Parish residents through ongoing stress and anxiety. The Applicant has sought to reduce this through engagement with residents and stakeholders as the Project has developed. Potential impacts of the Project on both physical and mental health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. In respect to community wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties

Topic	Comment	National Grid's response
		and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated. The assessment draws on findings set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), which contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Two properties to the south of Tacolneston meet the thresholds for inclusion in the RVAA. Table A13.4.3 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233] summarises the outcome of the assessment for these properties, concluding that although they would be affected by a moderate change to visual amenity in the round, this constitutes a medium magnitude of effect and is therefore not considered sufficient to trigger further assessment. Overall, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties unattractive places to live.
Landscape and Visual	5. Detrimental Impact on Visual Amenity and Landscape Character The proposed route cuts directly through the heart of the unspoiled and tranquil rural landscape of South Norfolk. Tacolneston is situated within a predominantly agricultural and ecologically sensitive area. The	The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.

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	introduction of 50-meter-high steel lattice pylons will irrevocably industrialise this beautiful landscape. The sheer scale of the pylons will constitute an unacceptable, dominating, and permanent scar on the horizon, destroying the character of the countryside which is valued by both residents and visitors. The Parish Council maintains that this visual intrusion is disproportionate to the perceived national benefit and represents a failure to respect the local environment.	Effects on visual receptors within Tacolneston Parish Council are set out under Visual Receptor Areas (VRAs) A5 and A6 in paragraphs 13.4.49 to 13.4.71 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Tacolneston Parish Council are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under Ashwellthorpe Plateau Farmland Landscape Character Area (LCA) in paragraphs 13.3.81 to 13.3.96 and Tas Tributary Farmland LCA in paragraphs 13.3.111 to 13.3.125. Impacts on Residential Visual Amenity have been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. This has been produced in line with Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment⁷⁸ and assesses where permanent changes to visual amenity, as a result of the introduction of pylons and overhead line, may affect living conditions at specific properties within 200 m of the Project centreline, and where the Residential Visual Amenity Threshold (RVAT), as described in Technical Guidance Note 2/19, may be breached. The assessment recognises that there would be significant change to views from properties within Tacolneston, but the RVAT is not anticipated to be breached in this location.
Biodiversity, ecology and nature conservation	6. Environmental and Ecological Damage The construction and presence of this vast infrastructure will result in significant and unavoidable ecological damage. The construction phase alone will involve heavy vehicle movement, habitat fragmentation, and disruption to local watercourses and soil health. Furthermore, the	This area of land within the Order Limits, between Tacolneston and Fornsett St Mary, has been subject to a full range of ecological surveys over 2022–2025. These surveys have included habitats, bats, badgers, water vole, otter, reptiles, invertebrates and birds. The survey results and assessment of impacts on ecological receptors are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the associated ecological appendices. This assessment has included potential disturbance and fragmentation impacts on relevant ecological receptors. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) set out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities.

⁷⁸ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

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	permanent 'pylon highways' and maintenance requirements will require the clearance of natural vegetation, disrupting established ecosystems and local wildlife corridors.	In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits, which include watercourse biodiversity units. Soil management measures to be implemented during construction across the Project, including across Tacolneston Parish, to protect the soil resource (including the health of the resource), are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. Mitigation measures would be implemented during construction to reduce the risk of disruption to watercourses including those across Tacolneston Parish. These measures are considered within 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and detailed in 7.2 Outline Code of Construction Practice (Revision C). With these measures in place, there would be no significant impacts on watercourses.
Alternatives	7. Failure to Pursue Appropriate Alternatives The Parish Council strongly objects to the assumption that an overhead line is the only viable solution. Given the project's magnitude and the proximity to existing infrastructure, the preference for overhead lines over underground or sub-sea cabling represents a short-term, cost-driven decision that disregards future-proofing, long-term environmental value, and	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments

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	community impact. We assert that the national significance of the landscape demands that the most modern and least intrusive solution—undergrounding—be mandated, as is common practice in other sensitive areas internationally.	
Land and Property	8. Impact on Local Communities and Infrastructure The proposed route will result in direct impacts on Tacolneston residents, including: Property Devaluation: The proximity of pylons is known to severely depress property values.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaulay-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: • House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaulay-Denny power line. • Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different

Topic	Comment	National Grid's response
		buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Land use	Severance of Land: Agricultural land will be severed, making farming operations less efficient and potentially unviable for local businesses.	The Applicant has taken into consideration the location of existing land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and document the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner.
Noise and Vibration	Disruption of Amenities: Construction will cause prolonged periods of noise, dust, and light pollution, severely impacting the quality of life and enjoyment of local public footpaths and amenities.	6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft

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		Development Consent Order (Revision C) within the final Code of Construction Practice. With regard to dust generation from construction, Section 7.2 of 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] discusses the results of the construction dust assessment. The assessment was undertaken in line with IAQM Construction Dust Assessment Guidance. The assessment considers receptors up to 250 m from the Order Limits. 6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area [APP-154] shows a 250 m boundary around the Order Limits. The assessment concludes that with appropriate implementation of the mitigation measures specified in 7.2 Outline Code of Construction Practice (Revision C) and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] there would be no likely significant effect due to dust nuisance for receptors within 250 m of the Order Limits, including public footpaths and amenities, including within Talconeston Parish. 7.2 Outline Code of Construction Practice (Revision C) contains detailed, project-wide commitments on lighting, including: • Use of the lowest safe luminosity • Directional and shielded lighting to minimise light spill • Switching off or using motion sensors when not in use • Specific measures to protect ecological receptors (e.g., bats) and minimise visual intrusion • Compliance with best practice guidance (e.g., that provided by Institution of Lighting Professionals and Bat Conservation Trust⁷⁹). The commitments above are set out in Table 6.1 (GG26, B06, LV03) of 7.2 Outline Code of Construction Practice (Revision C). Requirement 4 of 3.1 Draft Development Consent Order (Revision C) mandates that all construction works must be carried out in

⁷⁹ Institution of Lighting Professionals and Bat Conservation Trust (2023) *Bats and Artificial Lighting at Night. Guidance Note 08/23*

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		accordance with the approved Code of Construction Practice (and its appendices and sub-plans) which must be 'substantially in accordance with' 7.2 Outline Code of Construction Practice (Revision C) .
N/A	Conclusion Tacolneston Parish Council urges the Planning Inspectorate and the Secretary of State to reject the current proposal for the overhead line development. The long-term, detrimental, and irreversible impacts on the landscape and the community far outweigh the arguments for the chosen route and method. We demand that National Grid re-evaluates the entire scheme and adopts a policy of full undergrounding. We look forward to receiving confirmation that this formal objection has been registered and will be fully considered during the examination phase.	Noted. Specific points of objection are responded to above.

2.56 Terling and Fairstead Parish Council

2.56.1 Table 2.56 below outlines the Applicant's comments on the Relevant Representation (RR) provided by (Name of Respondent here) **[RR-3618]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.56 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	While accepting the requirement to move wind generated power from the North Sea to London, Terling and Fairstead Parish Council (T&FPC) objects to the National Grid Norwich to Tilbury pylons proposal. We support the Essex Suffolk Norfolk Pylons action group.	The Applicant notes the respondent's feedback and has addressed specific comments made within the Relevant Representation below.
Consultation	The Consultation has been legally deficient since 2022.	The Applicant is clear that its approach complies with relevant regulatory requirements, follows appropriate guidance and is lawful. This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007].
Alternatives	No alternatives have been presented and we have not	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set

Topic	Comment	National Grid's response
	been listened to by National Grid. Pylons are a dated technology. New technology could be used to bury the cables under the land or under the seabed. These modern technologies are probably cheaper. Burying the cables underground would reduce the devastating impact on the many communities along the proposed route. Burying the cables under the seabed would eliminate it altogether.	out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Consultation	As a Parish Council, we have actively engaged in recent briefings, both in person and via webinar sessions. It is important to emphasize that the proposed solution for East Anglia has been met with significant opposition. East Anglia's MPs, County, District and Parish Council and residents themselves have all voiced their strong objections. Our MP, Priti Patel, has stated her opposition to this project, stating that she does not believe pylon infrastructure is suitable for our region. Instead, she advocates the offshore transmission of electricity to minimize the impact	NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding.

Topic	Comment	National Grid's response
	on our countryside endorsing the Offset group of MPs. Whilst we support the concept of North Sea wind farms generating clean and affordable electricity, we strongly favour the 'offshore' solution to minimize environmental damage and disruption. We believe this approach will be more sustainable in the long term, and future generations will appreciate the preservation of our landscapes. National Policy Statement for Electricity Networks Infrastructure EN-5 requires National Grid (NG) to appropriately consider alternative technologies, which would include offshore subsea routing. An integrated offshore option, which replaces this current proposed piecemeal approach, with a coherent strategy to connect offshore wind farms off the East Anglian coast with offshore undersea connections has thus far has only been vaguely assessed.	National Grid considered alternatives in the 2023 Strategic Options Backcheck and Review [APP-357], with all on-shore alternatives of AC overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC on-shore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Cost	The Strategic Options Back check list and review sets out the costs of offshore schemes but uses an imposed HM	The use of 3.5% NPV depreciation is only used for lifetime costs for losses and maintenance as set out Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] pages D1-D14. This is only used with appraisal of technologies within options and does not affect the capital cost which is in

Topic	Comment	National Grid’s response																
	Treasury Green Book rate Net Present Value figure of 3.5% whereas NG suggests 6.25% over 40 years. That can only serve to make the offshore analysis more expensive and skew the decision to onshore. We note that NG has adopted the “Least Worse Regrets Method” (LWRM) of promoting its preferred onshore proposal. We acknowledge NG have the problem of determining an appropriate level of electricity capacity procurement in the United Kingdom, where decisions must be made several years in advance, in spite of considerable uncertainty as to which of a number of future scenarios may occur, and where LWRM analysis is currently used as the basis of NG decision making. We suggest that undue weight is being conveniently applied by NG in this LWRM analysis to the onshore routing and a fundamental reassessment as to the cost benefits (both in terms of capital and revenue spend on	2020/21 defined cost base. Variation in the depreciation rate makes no appreciable difference in the losses and maintenance cost and does not affect the choice which is dominated by capital costs not impacted by discount rate. The National Energy System Operator (NESO) was created as a result of the Energy Act 2023, and is an independent System Operator. It is responsible for planning and delivering the energy of today and the future. To do this, NESO looks at all sources of energy (like gas and electricity) and works with customers, other organisations and government, to deliver what is needed to reach a zero-carbon future. NESO as part of its independent planning role has published documents to identify projects to meet critical policy needs. In 2022 NESO (previously the Electricity System Operator (ESO)) produced the Network Options Assessment (NOA). Section 4.3: NOA Cost Benefits Analysis, pages 44-46, of 7.17 Strategic Options Backcheck and Review [APP-355] describes the original Least Worst Regrets Analysis carried out by the Electricity System Operator (ESO) (now referred to as the National Energy System Operator (NESO)). This exercise was only undertaken once by NESO and reflected within our report, and is not the Applicant’s options evaluation process. NESO is a fully independent organisation and undertakes Least Worst Regrets Analysis as part of establishing proceed signals for projects. The NOA cost-benefit analysis identified the ‘East 7’ option as the highest ranking option from an economic perspective. This option is shown in Table 4.2, page 46 of 7.17 Strategic Options Backcheck and Review [APP-355], which is reproduced below.																
		Image 1.1 East 7 outcome recommendation from [APP-355] <table><tr><td>East 7</td><td>AENC</td><td>Norwich-Bramford</td><td>AC OHL (Onshore)</td></tr><tr><td>Capex £2,189.75m</td><td>ATNC</td><td>Bramford-Tilbury</td><td>AC OHL (Onshore)</td></tr><tr><td>As East 6 with enhanced export capacity from EC5</td><td>SCD1</td><td>Richborough-Sizewell</td><td>HVDC Cable (Offshore)</td></tr><tr><td></td><td>TENC</td><td>Tilbury-Grain</td><td>AC OHL (Onshore)</td></tr></table>	East 7	AENC	Norwich-Bramford	AC OHL (Onshore)	Capex £2,189.75m	ATNC	Bramford-Tilbury	AC OHL (Onshore)	As East 6 with enhanced export capacity from EC5	SCD1	Richborough-Sizewell	HVDC Cable (Offshore)		TENC	Tilbury-Grain	AC OHL (Onshore)
East 7	AENC	Norwich-Bramford	AC OHL (Onshore)															
Capex £2,189.75m	ATNC	Bramford-Tilbury	AC OHL (Onshore)															
As East 6 with enhanced export capacity from EC5	SCD1	Richborough-Sizewell	HVDC Cable (Offshore)															
	TENC	Tilbury-Grain	AC OHL (Onshore)															

Topic	Comment	National Grid's response

costs in use for the lifetime of the onshore cabling proposal) is now required to be presented for consultation prior to any formal submission of a DCO. The Strengths and Weaknesses Threats and Opportunities analysis of an offshore scheme (which would provide benefits for generations to come as explained later in this representation) should be included in a separate LWRM approach to be able to form a balanced assessment.

In November 2024 NESO published the Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis. There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.

Image 1.1 NESO Clean Power 2030, Annex 2: Networks, Connections and network access analysis

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

There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.'

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		The independent NESO is the owner of the Least Worst Regrets Analysis, they are the owner of the analysis model and data. They apply their model to balance Project Costs and Constraint Costs to evaluate impacts upon the consumer. The NESO evaluations are reflected in 7.17 Strategic Options Backcheck and Review [APP-355], pages 44-46 and Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery, page 8. The NESO published information within these documents and set out above represents the latest impact upon system constraints and associated costs. These robust and independent assessments and reports support the urgent Need for the Transmission System reinforcement as set out in NPS EN-1. They independently support both the technical and policy need for transmission infrastructure, preferably by 2030, in the interest of electricity consumers and reduction in constraint costs for the system.
Good Design	Are we to assume the pylons are only expected to have a 40 year life span and our community may have to endure further disruption for replacement of both cables and pylons? We support many others who state the mitigation to a range of harms the offshore scheme will alleviate. There is no mention of the number of affected parties and scale of the compensation payable by the onshore proposal, fees annual licences, planning blight costs, professional fess (and its NPV)	7.19 2023 — Strategic Options Backcheck and Review [APP-357] Appendix C “Technology Overview” pages C1-C10 set out detail on all technology alternatives including the technology design life that derives the 40-year life referenced across all technologies. Specifically for Overhead Lines paragraph 1.2.11 page C4 7.19 2023 — Strategic Options Backcheck and Review [APP-357] states Each of the three main components that make up an overhead line has a different design life, which are: • Between 40 and 50 years for overhead line conductors • 80 years for pylons • Between 20 and 40 years for insulators. The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development.

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	when set against the very limited number of consents required for an offshore solution.	
Cost	From what we can see there is not a costs in use comparator in NG's proposals for the onshore scheme (viz maintenance and replacement costs, inspection regime, etc.) merely a comparator of capital costs and Net Present Value (NPV). We suggest this is an omission that does not permit a truly balanced assessment. We note that there are already installed a number of undersea cables and to bring them onshore to the existing Bradwell on Sea power station with its existing distribution infrastructure should be appraised. We understand that NG has dismissed the offshore grid option based on cost considerations. However, the additional amortized cost per person in the regions served would amount to little more than £2 per year, a relatively minor expense for a significant environmental benefit. Mandatory Treasury Green	The Applicant notes the respondent's feedback. Cost is one of many factors that was considered in making decisions on the Project as guided by our duties under the Electricity Act 1989. The NPS EN-5 (2024) makes it clear that the Government considers overhead lines to be appropriate and acceptable in most instances. However, the Government is aware that overhead lines may not be appropriate in particularly sensitive areas. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting¹⁸). Its aim is to ensure that decisions regarding the project's design (route, location, or technology option) are based on a full understanding and balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. The consideration of cost within the decision-making process is therefore one of our statutory duties and is not something that we could make representation to the Office of Gas and Electricity Markets (Ofgem) to waive. The multi-factor evaluation of all alternative options confirms the same conclusion. 7.19 2023 — Strategic Options Backcheck and Review [APP-357] Section 5 Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socio-economic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations.

Topic	Comment	National Grid's response
	Book guidance has not been followed by National Grid Electricity Transmission (NGET) and its repeated claims that Ofgem requires the cheapest solution are simply false. It is imperative to highlight that initial cost estimates should not be the sole criterion for evaluating proposals. Emerging technologies such as offshore cabling offer merits for the future economy and society, fostering increased economic activity in environmentally sensitive sectors. These technologies have already found success in recent infrastructure projects such as new subsea interconnectors between Scotland and the North of England. Promoting these technologies will encourage their continued use and discourage the use of outdated and environmentally intrusive pylon technology.	The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355] Chapter 5 Strategic Option Overview pages 45-47 summarises the options, 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127], entire chapter and 5.15 Design Development Report [APP-122] Section 2 Project-Wide Consideration Relevant to Design Development pages 17-33 and local issues addressed in section A-H sitting and routing alternatives. More localised design variants have also been considered. The Applicant considered the following options, as well as alternating current (AC) overhead lines: i) An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal. ii) AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20-30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed. iii) High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection. Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] pages D1-D14, presents the costs, based on a transparent economic appraisal. The costs were set out at ISH1 with all data coming from 7.19 2023 - Strategic Options Backcheck and Review [APP-357], Sections 7 -14, tables of each section and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D: Economic Appraisal.

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Image 2.2 Alternative Methods of Electricity Transmission – Cost Overview

Data from 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Cost base in 2020/21 prices				
On-shore		EAN4 (AENC) OHL	EAS2 (ATNC) OHL	TOTAL
	Wholly Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC)	£355.20m	£539.30m	£894.50m
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93			
		EAN4 (AENC) OHL	EAS2 (ATNC) OHL + Cable	TOTAL
	Majority Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) [with 20km Cable]	£355.20m	£1,275.10m	£1,630.30m
	Derived by 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix D "Economic Appraisal"			
Off-shore		EAN4 (AENC) HVDC	EAS2 (ATNC) HVDC	TOTAL
	Wholly 4 Ended HVDC Option Project Total EAN4 (AENC) + EAS2 (ATNC)	£2,381.50m	£3,473.00m	£5,854.50m
	Data from Table 10.1 page 80 + Data from Table 12.1 page 93			
		Offshore 1		TOTAL
	Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury	£4,096.50m		£4,096.50m
	Data from Table 14.2 page 110			
		Offshore 1	Bramford HVDC Turn-in Cost	TOTAL
	Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury	£4,096.50m	£1,265.10m	£5,361.60m
	Data from paragraph 14.4.6 page 111			
* Transmission System Comparable Options - Delivering System Benefits of Connecting to Bramford				

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

Paragraph 14.4.6 referenced in the table above, states:

Should this circuit at full 6000 MW capacity made multiterminal to provide the same system flexibility as the AC circuit options. There would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital

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		<i>costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).'</i> The cost of a wholly overhead line, without any regard to any landscapes or any other environment constraints is presented as part of the initial appraisal. There is also a second cost, which includes the post-consultation view of the requirements to mitigate the landscape impacts, i.e., the cost with the underground cable of £1.6 billion. In comparison, the cost of a wholly four-ended HVDC option is £5.8 billion. The Offshore 1 - suboptimal 2-ended HVDC option between Norwich and Tilbury would cost £4 billion. The reason it is suboptimal is because it does not have the connection with Bramford Substation and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection. To achieve the proposed same electrical capabilities, there is an option to have a three-ended link in Bramford Substation, so there would be three converters at Norwich, three converters at Tilbury, and three converters at Bramford Substation on a three-ended HVDC Voltage Source Converter (VSC) link. This would bring it to a similar technical capability as the proposed connection but would raise the price to £5.3 billion. It would also have no ability to connect the generation customers. The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in

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		the Applicant's licence, Condition D3: Transmission system security standard and quality of service.
Safety and Security	We are given to understand that the final design of these pylons has yet to be determined and NG representatives at the various presentations we attended appeared to be bemused as to the adverse comments on the proposed highest pylons in the UK. We understand these will now have aviation-warning lights at the top. Pylon design has not changed in over 70 years. We note in 2011 the Royal Institute of British Architects held a competition for new pylon design attracting over 250 entries. Can NG not revisit such designs especially where they may be placed close to Areas of Outstanding National Beauty, Sites of Special Scientific Interest and proximity to Historic Buildings and vistas?	The respondent's view is noted, however the Applicant must work within the confines of the relevant policy which is the current NPS EN-5 (2024). This policy makes clear that 'the Government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated Landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)'. The majority of the Applicant's existing transmission network is constructed from lattice pylons and overhead lines; these are a demonstrably reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example, with regard to climate change) would need to be applied to the entire network. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project, these included an offshore connection using Direct Current (DC) technology, and various onshore connection options including: increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and Gas Insulated Line (GIL). Currently, overhead lines using lattice pylons offer the most economic and efficient solution to transmit electricity over long distances. Paragraphs 2.5.5 to 2.5.11 of 5.15 Design Development Report [APP-122] describes why the Applicant is proposing an overhead line on standard lattice pylons and where alternative pylon types (such as low height lattice and T-pylons (RIBA 2011 pylon design competition winner) were considered as part of the mitigation hierarchy). The Applicant maintains that standard lattice pylons are appropriate, noting that in two locations low height lattice pylons are proposed to reflect the mitigation hierarchy in lieu of aviation impacts at Thurrock Airfield and cultural heritage impacts at Langley's Registered Park and Garden and the conservation areas at Great and Little Waltham.

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		Regarding Historic Buildings and vistas – the use of low height lattice pylons at the above specified locations demonstrates that the Application has made appropriate use of alternative available pylon design where it would reduce impact to the Historic Environment. With regards aviation warning lights, NPS EN-1 (2024) refers to the need to consider requests for obstacle lighting as a potential means of mitigation (amongst others). Noting however the need to also consider the wider Project effects of such lighting on landscape and ecology etc (see paragraph 5.5.54). The Applicant can confirm that, as currently designed, the Project is not proposing aviation lighting on the top of pylons as an aviation safety impact mitigation measure.
Consultation	This Consultation has been from the outset, and remains, inadequate. Valid alternatives have not been presented and the harm of NG's preferred solution significantly outweighs the benefits. Viable and deliverable alternatives such as an offshore grid and undergrounding of cables have not been presented for consultation.	The Applicant disagrees with the respondent and is clear that the Project complies with Regulatory requirements. The Applicant has listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .
Alternatives	Alternatives which we would support are: - A fully integrated offshore grid, or - Underground High-Voltage Direct Current (HVDC) cables from Norwich to	The Applicant has considered a wide range of alternative means for meeting the Project need and set these out in the Corridor and Preliminary Routing and Siting Study (CPRSS), published in support of the 2022 non-statutory consultation (7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), and the 2023 and 2024 Strategic Options Backcheck and Reviews (SOBR) (7.19 [APP-357] and within 7.17 [APP-355]),

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	Tilbury, either underground or subsea. The subsea option includes a platform for Five Estuaries and North Falls, which we welcome. We have commented on NGET's previous two, non-statutory consultations, in 2022 and 2023 that our strong preference was for an offshore grid thus avoiding the harm to the local economy, environment and the health and wellbeing of our community. We note that since the previous consultation in 2023, little has changed in the latest proposal for our area except:- 1. Some minor shifting north east of the pylon alignment itself, nearer to Ranks Green. 2. Where the existing 400kV pylon line would be crossed by the proposed new 400kV pylon line Cable Sealing End (CSE) compounds are now proposed to be located in the same field and closer together, thus avoiding undergrounding.	published in support of the 2023 non-statutory consultation and statutory consultation and the 2025 7.17 Strategic Options Backcheck and Review [APP-355]. We have also considered feedback relating to suggested alternatives and set out responses within the 2022 and 2023 non-statutory consultation, Statutory and Targeted Consultation Feedback Reports and elsewhere within this report. Our job is to carefully consider the most feasible options and present our proposals for public consultation. The Applicant cannot present an alternative for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. On the more general point of changes the Applicant has carefully considered all requests for change and set out decisions and the basis for those decisions in the 5.1 Consultation Report [APP-066] and 5.15 Design Development Report [APP-122]. The fact that change has not been made will be as a result of the alternative suggestion being poorer performing. This may be for technical reasons, because of transfer of effects etc. Finally the Applicant notes the respondents position re the NESO study but considers that it has responded on this point with clear evidence and rationale for decision making on multiple occasions with our position stated in responses to relevant representations, written questions etc.

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	3. The undergrounding of a small section of the existing 132kV UK Power Networks overhead line to the west of Fuller Street. We are concerned that the proposal now before us remains largely unchanged given the opposition expressed and that the latest proposals by NGET dismisses the Electricity Systems Operator (ESO) 2024 East Anglia Network Study that considered nine alternative options and timescales, including offshore, and High Voltage Direct Current (HVDC) underground alternatives.	
Needs Case	These latest proposals for Norwich to Tilbury dismisses the Hiorns Smart Energy Networks review, published in November 2023, commissioned jointly by Essex, Suffolk, and Norfolk County Councils. This independent report suggested that the need for additional transmissions capacity would be closer to the year 2035, and not 2030 as NG is suggesting. This revised, lengthier, timeframe is likely to see a reduction in the	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis¹², Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission

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	cost for NG to develop an integrated offshore alternative as new technology is developed. The ESO and the Government should ensure that the Offshore Coordination Support Scheme (OCSS) is brought into consideration along with the extended timetable of the Hiorns report, which would allow consideration of more acceptable options, including offshore. The proposal dismisses the OCSS and reduces the consideration to just Norwich to Tilbury power transport, assuming that the power from the wind farms is already transported to Norwich, when the reality is that it is not, but such contracts may be in place already. The ESO and the Government should widen the ESO Options report and not restrict the starting point for all options as Norwich, which has the pre-emptive effect of making the Overhead Line (OHL) solution the most economical, and restricts consideration of a strategic offshore grid.	services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.

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Historic Environment	Section E: Braintree With specific comment on 'Section E: Braintree' as it relates to our community:- Existing 132Kv UK Power Networks Pylon Line – Fuller Street Fuller Street is a rural community of approximately 28 properties situated in our parish. It contains 3 listed buildings, a very popular pub/restaurant, a garage and two farms. There are currently two existing lines of pylons that run on either side of the village, one down the west and the other to the east. The proposed NG line is to the north-west of the village.	The Applicant has assessed two listed buildings within the village of Fuller Street, The Herons (1337781) and The Stores (1146812). Within the surrounding of Fuller Street there are several listed buildings, however, without further location information for the listed buildings it is not possible to comment more specifically on the respondent's concern for the third one. The Applicant has reviewed the assessment of the Herons and the Stores in light of the respondent's comments. The Applicant concludes that the setting of these assets does extend to the Order Limit. Their settings have been thoroughly assessed by the Applicant. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The Applicant considers that during the construction phase, both assets would experience moderate adverse significance of effect however, they would experience a permanent minor beneficial significance of effect during the operation phase as explained in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], Also, during the construction they would experience of mid less than substantial harm but no harm during the operation phase.(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The applicant is confident that this assessment is proportionate and appropriate. Where a mid-level less than substantial harm conclusion has been reached for the construction phase impacts in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], these impacts would be temporary, and the construction related elements of the Project would be reinstated following completion of construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of

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		the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. Changes to temporary construction works were considered as part of this. 5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. The In relation to agricultural land, the assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade across the Project, which shows the land around Fuller Street (within the Order Limits) to comprise Grade 3a land. The Applicant has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routing and siting process confirms that no reasonable alternatives are available.
Socio-economics, Recreation and Tourism	The surrounding area has a high amenity value being popular with walkers and cyclists from neighbouring towns. The long distance path known as The Essex Way passes through the centre of the village. The pub is very well used by both visitors and locals, as is the garage. The proposed line of pylons	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment on of the potential impacts on community facilities, recreational land and recreational routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include: traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] , 7.2 Outline Code of Construction Practice (Revision C) ; 7.3 Outline Construction Traffic Management

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	(APP014F) is on high, flat, exposed land. It will be clearly visible over a large area.	Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. No significant adverse effects have been identified for community facilities, recreational land and recreational routes located within Terling and Fairstead Parish Council. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Effects on visual receptors within Terling and Fairstead Parishes, are set out under Visual Receptor Areas (VRAs) E5, VRA E6, VRA F1 and VRA F2 in paragraphs 13.8.47 to 13.9.24 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. This includes an assessment of effects on users of PRoW and the Essex Way. Effects on visual receptors would be significant within approximately 1.5 km of the Project.
Consultation	North West and South West of the hamlet of Fuller Street it is proposed that a section of the existing 132kV UK Power Networks line be 'dismantled'. At least, this is the description used in the legend of the maps presented at the last public consultation and in conversation with National Grid representatives at the Public Information Events (PIE) held in Chelmsford and Witham. In reality this would be undergrounding with the dismantling of four pylons, the	Details of the proposed 132 kV UK Power Networks in the Fuller Street area can be found on sheet 46 of 63 of 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and sheet 46 of 63 on 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design [APP-134]. Additional descriptions of the type of work involved can be found in paragraphs 4.8.99 to 4.8.103 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The Applicant can confirm that four pylons on of the existing PSB 132 kV UK Power Networks overhead line will be underground. Two of which will be replaced by new cable sealing end platform pylons (one at each end) to enable the transition of overhead line to underground cable at each end, to facilitate the underground cable diversion where the proposed 400 KV TB overhead line crosses the existing 132 kV overhead line.

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	full plans for this did not form part of the last public consultation so it was difficult for us to comment fully and despite repeated requests to the NG helpline answers to our questions were not forthcoming.	
Traffic and Transport	However, we have examined the proposals now with the Planning Inspectorate and would comment that the proposed undergrounding of a section of the existing line to the west of Fuller Street (APP022F) is welcome, but completely insufficient. Whilst undergrounding itself is to be encouraged, and we fully support, this does in turn means that the UK Power Network pylons either end of the 'dismantled' section will in fact be heavily reinforced structures with compound sealing ends and will be further blots on the landscape being much larger than the existing pylon and even very intrusive. This is a popular walking route on PROW 'footpath 20 Fairstead' linking the hamlets of Ranks Green and Fuller Street and to the South forms part of views along the	The Applicant notes the concern regarding Fairstead Footpath 20. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PROWs). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PROWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PROWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PROW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements will be developed by the Main Works Contractor and will be agreed with the Local Highway Authority as part of the final PROW Management Plan. As set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], Fairstead Footpath 20 will require a temporary diversion for an indicative period of 15 weeks due to a pylon working area, with users diverted around the perimeter of the working area for this period. For the remainder of the period during which Fairstead Footpath 20 is affected by the Project, the PROW will remain open on its existing alignment, with access managed as necessary in accordance with the 7.6 Outline Public Rights of Way Management Plan [APP-329]. Where it intersects with working areas, appropriate safety measures will be implemented to allow continued safe passage for PROW users. Fairstead Footpath 20 will be reinstated as soon as practicable to its original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with

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	long distance Essex Way PROW.	Local Highway Authorities and affected stakeholders as the detailed PROW management arrangements are developed. An assessment of the residual effects on delay to users of PROWs within Terling and Fairstead Parish can be found within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. This includes Footpath 20, where a short diversion of approximately 37 metres is proposed over a 15-week period. It was concluded that no significant impact of delay to PROW users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. As noted by the Parish Council, a short section on an existing 132 kV overhead line would be removed to the west and north of Fuller Street. This was considered in the assessment of effects on landscape and visual receptors, as set out in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226]. The reinforced structures referred to by the Parish Council would be of a similar appearance and height to the existing pylons with the addition of the sealing end platforms to enable the transition from overhead line to underground cable. Effects on visual receptors within Terling and Fairstead Parishes, are set out under Visual Receptor Areas (VRAs) E5, VRA E6, VRA F1 and VRA F2 in paragraphs 13.8.47 to 13.9.24 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. This includes an assessment of effects on users of PROW and the Essex Way. Effects on visual receptors would be significant within approximately 1.5 km of the Project. Views from Fuller Street are represented by Viewpoints 5.09: Fairstead Lodge Road near Fuller Street and Viewpoint 6.02: Essex Way, west of Fuller Street. Significant effects are identified at these viewpoints as set out in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 4 of 4 [APP-232]. A sequential assessment of effects on recreational receptors using the Essex Way is set out in paragraphs 13.12.84 to 13.12.121 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Effects on landscape receptors are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape

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		Character Area (LCA) B1 Central Essex Farmland in paragraphs 13.3.654 to 13.3.678. Significant effects are identified within approximately 1.5 km.
Good Design	With the minimal undergrounding currently proposed both these routes would be significantly impacted by the massing of pylons and overhead cables in breach of Holford Rule 6. The current proposals do not go far enough to mitigate the negative visual affects on Fuller Street being far too close to Fuller Street and is on the highest part of the surrounding countryside. It will be clearly visible from every part in the village and dominate the south-westerly skyline. The termination of works / compound sealing ends should be taken one pylon further south. This would be away from properties and in a wooded valley. Additionally, the land NG proposes to use for access, storage, undergrounding, and compound sealing ends/termination works runs from north to south around the western side of the village. The proposed NG line runs from west to north and the second	Effects on landscape and visual receptors at Fuller Street are set out in the row above. Holford Rule 6 notes that <i>'in country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'</i>. Part of an existing 132 kV overhead line at Fuller Street is proposed to be undergrounded as part of the Project. A number of small wood pole lines will be removed along the length of the Project in this area. The Applicant acknowledges that existing overhead lines and the proposed overhead line would be visible alongside each other, but does not consider that these would constitute a 'wirescape' in this location. The Applicant notes the reference to Rule 6 of the Holford Rules. The interpretation of the Holford Rules text is not implemented as rigidly as implied. The Holford Rules were applied throughout this process as part of a balanced assessment rather than as absolute requirements. Compliance with individual Holford Rules can present conflicts, and routeing decisions require judgement to balance landscape, heritage, ecological, technical and deliverability considerations. This has been considered by the Applicant throughout the iterative process of assessment and design as part of the Environmental Impact Assessment. The Applicant has considered whether there is merit in parallel arrangements, in the separation of infrastructure or in undertaking modifications to the other vertical infrastructure over the course of the Project development most recently in 5.15 Design Development Report [APP-122] from paragraph 2.5.24. The approach to the consideration of the value of landscapes is as described against the comment above.

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	existing line of pylons runs from north-east to south. This is far too much for one small community to bear and should be regarded as 'wirescaping' the village in breach of the Holford rules.	
Biodiversity, ecology and nature conservation	NG also proposes to remove trees and hedgerows (APP053F), divert traffic and close roads (APP030F).	Detailed hedgerow and tree surveys have been undertaken across the Project, including around Terling and Fairstead. 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (which would occur should consent be granted), it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. 7.2 Outline Code of Construction Practice (Revision C) contains commitment GG14, which states <i>'Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.'</i> 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.

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		The Applicant is proposing to temporarily close Fuller Street between Boreham Road and Lodge Road, to ensure safe working. It is anticipated that these closures are related to the construction of the crossover bellmouths, and the undergrounding of the UK Power Network cables. The proposed diversion follows SMD-F-002, SMD-F-001 and SMD-F-003, detailed in 2.5 Access, Rights of Way and Public Rights of Navigation Plans Section F [APP-038]. The anticipated durations of the closures will be short term, less than four weeks. As detailed in Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. It is anticipated that this information will be publicly available on the Project website and the relevant Local Highway Authority website. This would include information on road closures. The Project will adhere to these principles, the permit requirements and any resulting traffic diversions will be shown on the relevant county council online traffic map. Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B) provides information on the actions of the community liaison officer, including communications about road closures. Communication is anticipated to include sending letters/emails to residents that detail the extent of the works and, for example, any implications on parking arrangements. Details of where traffic management is in place is also anticipated to be available on the Project website.
Traffic and Transport	Footpaths have also been affected. This will have a huge detrimental effect on local businesses and villagers. NG state this will be a temporary measure, but the scheduled works could last for years.	The Applicant notes the concerns regarding impacts on PRow. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRow). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRow at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRow would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRow are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329] and will be developed further into detailed, site specific measures by the Main Works Contractor.

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		Within the Parishes of Fairstead and Terling, the affected PRoWs are Fairstead Bridleway 5, Footpath 3 and Footpath 20 and Terling Footpath 11. The Applicant has provided further detail with regards to Fairstead Bridleway 5, Footpath 20 and the Essex Way elsewhere within this document, both preceding and following this particular response. Fairstead Footpath 3 and Terling Footpath 11 will remain open on their existing alignment, with access managed in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Where these PRoW intersect with working areas or haul roads, appropriate safety measures will be implemented to allow continued safe passage for PRoW users during construction of the Project, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PROW Management Plan. All PRoWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRoW management arrangements are developed. An assessment on business premises has been undertaken as part of the ES and set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant adverse effects have been identified for businesses located within Terling and Fairstead Parish Council. An assessment of the residual effects on delay to users of PRoWs within Terling and Fairstead Parish can be found within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that no significant impact of delay to PRoW users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied.
Traffic and Transport	The proposed undergrounding will require a total closure of the lane which runs from Fuller Street to the Boreham road. We	The Applicant is proposing to temporarily close Fuller Street between Boreham Road and Lodge Road, to ensure safe working. It is anticipated that these closures are related to the construction of the crossover bellmouths, and the undergrounding of the UK Power Network cables. The proposed diversion follows lines SMD-F-002, SMD-F-001 and SMD-

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	have been unable to ascertain how long this closure would be in place.	F-003, detailed on 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-038] Section F. The anticipated durations of the closures will be short term, less than four weeks. As detailed in Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan (Revision B) the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. It is anticipated that this information will be publicly available on the Project website and the relevant Local Highway Authority website. This would include information on road closures. The Project will adhere to these principles, the permit requirements and any resulting traffic diversions will be shown on the relevant Local Highway Authority online traffic map. Section 6.5 of 7.3 Outline Construction Traffic Management Plan (Revision B) provides information on the role of the community liaison officer, including communications about road closures. Communication is anticipated to include sending letters/emails to residents that detail the extent of the works and, for example, any implications on parking arrangements. Details of where traffic management is in place is also anticipated to be available on the Project website.
Socio-economics, Recreation and Tourism	The impact on local businesses during the construction phase will be immense. The very popular rural pub 'The Square and Compasses' in Fuller Street will be severely affected as the only alternative access route would be via Ranks Green, a considerable detour for customers, and that route itself will be subjected to the haul road crossing works. We would ask that the undergrounding through Fuller Street and haul road construction south of	Through the routeing and siting exercise the Applicant has sought to reduce as far as practicable impacts on businesses, recreation and tourism assets. Reduction in these impacts would be considered during the detailed design process. Effects on local businesses are presented within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. No significant adverse effects have been identified for community facilities, recreational land and recreational routes located within Terling and Fairstead Parish Council. Please note that The Square and Compasses is not within the study area for Socio-economics, Recreation and Tourism assessment, and has been scoped out of the assessment due to the distance between the business and the Project, where there would be no land take required or no direct access falls within the Order Limits. In addition, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329] provide good practice and

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	Ranks Green is not concurrent, to lessen the impact on local businesses.	standard control measures to reduce and mitigate potential impacts and / or disruptions that may arise during the construction phase. The Project is anticipated to generate direct, indirect and induced employment during construction. The Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual Project and separate to any commitments under the proposed Development Consent Order (DCO) for this Project. Post-construction job opportunities are limited given the nature of the Project, however, the Applicant will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure the Applicant leaves a lasting positive legacy in the communities where they operate. With regard to a delivery mechanism, the above measures will be delivered as part of a community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance⁸⁰. The detailed construction programme for these elements of the works is currently being developed in consultation with the relevant delivery partners and statutory undertakers. The Applicant's intention is to programme the works in a manner that seeks to minimise disruption where reasonably practicable, including avoiding concurrent activities where possible. Construction phasing and traffic management arrangements will continue to be reviewed as the programme is refined, and appropriate mitigation measures will be secured through the Construction Traffic Management Plan and CoCP.
Consultation	In summary, we are concerned of the apparent lack of joined up thinking between NGs proposals and UK Power Networks as to the sighting and possible	The Applicant has held a series of consultations including Non-Statutory Consultation (Spring 2022), further Non-Statutory Consultation (Summer 2023), Statutory Consultation (completed Summer 2024) and Targeted Consultations (Spring 2025), notifying and allowing interfacing third-party developments and infrastructure projects an opportunity to formally submit their views on the Project and its interactions to the Project team.

⁸⁰ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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	removal of their existing network and sub stations and the interface of programmes for these works.	Additionally the Applicant has reached out to and been engaging individually with key third-party developments and infrastructure projects throughout the Front End Engineering Design stage taking on board comments so as to mitigate the impacts to third-party developments and infrastructure as best able within the draft DCO submission. This engagement will continue throughout the Examination process and detailed design, the results of which will be evidenced within the Statements of Common Ground and a set of agreed Protective Provisions where applicable.
Traffic and Transport	Construction We have no clarity as to project programming and the stages of construction, other than it being linear. We are advised that traffic volume along the haul roads is expected, at peak, to be approximately 100 HGVs per day, 7 days a week. It would be helpful to learn of the carbon capture / losses for each of the associated activities (floodlighting, construction camps and car parking, road clearances of mud, storage of materials, removal of waste) and perhaps a cost benefit analysis as part of the substantiation of the cost effectiveness of the onshore routings?	The Applicant sets out the proposed construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction vehicles will route along Primary Access Routes (PARs) to site access points. From the site access points, construction traffic will travel along an internal haul road. The Applicant is not proposing any PARs within the Terling and Fairstead Parish. The closest site access point to the Parish is located on PAR 43 (Spinks Lane / Highfields Road / Spa Road / Flora Road / Faulkbourne Road / Church Hill) as illustrated in Figure 1 Page 22 of 30 in 7.11 Transport Assessment Appendix I Figures [APP-342]. The Applicant is proposing 17 HGV movements along this PAR during the peak construction period in the AM and PM peak hours. The duration of the peak construction period at this location is two-weeks. Within 7.11 Transport Assessment Appendix E: LRN AM and PM Peak Construction Traffic and Committed Developments Impact [APP-338] it identifies that there would be 170 HGV daily movements along PAR 43 during the peak construction period. The Greenhouse gas emissions for both construction and operation are presented in 6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]. In addition, 7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308] provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The Green House Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project. This will include the development of a decarbonisation tracker which would contain a log of opportunities identified to reduce carbon through the Project lifecycle. Therefore opportunities would be looked at to reduce GHG emissions as much as practical through this process.

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		Table 6.1 of 7.2 Outline Code of Construction Practice (Revision C) provides mitigation measures to address potential issues such as removal of waste, storage of materials and management of mud/ debris. The multi-factor evaluation of all alternative options confirms the same conclusion. 7.19 2023 — Strategic Options Backcheck and Review [APP-357] Section 5 Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations.
Traffic and Transport	Footpaths and Public Rights of Way (PROW) – Footpaths and Bridleways There are a number of PROW set to be affected by this proposal most important of which is the aforementioned Essex Way which runs through Fuller Street, and PROW Bridleway 5 between Dines Hall and Newneys Farmhouse. T&FPC, under the Essex Paths P3 initiative, are responsible for maintaining these paths to permit access to the countryside. We are especially focussed on the obligations placed upon us to permit access to those parishioners and visitors with disabilities.	The Applicant notes the concern regarding Public Rights of Way (PRoW) impacted by the Project. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the listed PRoW, Bridleway 5 will remain open on its existing alignment, with access managed along two sections of it in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329] where it crosses the Project and intersects with the haul road. At these points appropriate safety measures will be implemented to allow continued safe passage for PRoW users. The Applicant also confirms that the Essex Way will remain unaffected where it passes along Braintree Road / Fuller Street through the village of Fuller Street, and will remain open under managed access where it runs along Great and Little Leighs Footpath 29 west of Fuller Street. Once again, where it intersects with working areas or haul roads appropriate safety measures will be implemented to allow continued safe passage for PRoW users during construction of the Project, in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location

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	National Cycle Network National Cycle Routes 16 and 50 run through the Parish and through Fuller Street where access to the Essex Way PROW may be made, and continues to Ranks Green and beyond. Cycling and construction traffic do not sit comfortably together on the roads within the Parish, the need to ensure road surfaces are cleaned of mud is a Health and Safety priority.	will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PROW Management Plan. All PROWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PROW management arrangements are developed. An assessment of the residual effects on delay to users of PROWs within Terling and Fairstead Parish can be found within in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Where temporary closures with diversions are proposed an assessment of residual effects on delay is presented within Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was concluded that no significant impact of delay to PROW users is expected once the measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. The Applicant sets out the proposed construction routing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will route along Primary Access Routes from the strategic and major road network to site access points. From site access points, construction traffic will route along the internal haul road. The Applicant is NOT proposing to route construction traffic on Fuller Street (noted in Figure 1 Sheet 23 of 7.11 Transport Assessment - Appendix I - Figures [App-342]). The Applicant is proposing a crossover bellmouth on Fuller Street, to allow construction vehicles to continue to travel on the haul road. Construction traffic is not permitted to join/leave the public highway at these locations, unless detailed in 7.3 Outline Traffic Management Plan [APP-309]. The Applicant is proposing to develop a Driver Information Pack detailed in 7.3 Outline Traffic Management Plan [APP-309]. The driver information pack will include detail of locations where cyclists, pedestrians and horse riders are anticipated to be in the highway, and appropriate actions. In line with good practice GG23 7.2 Code of Construction Practice [REP2-014] the Applicant notes that wash down of vehicles and equipment will take place in designated areas within temporary construction compounds to avoid mud/debris leaving site.

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Good Design	Holford Rule 2 which relates to listed buildings, conservation areas and ancient monuments would be breached under these proposals	The Applicant disagrees that the Holford Rules¹⁰ would be breached. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform how we balance different effects and define the proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains listed buildings or scheduled monuments with potential for a high level of effects which could conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules or breaching a specific rule. The Applicant has applied the Holford Rules. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. The Applicant has considered Holford Rule 2 through all the section of this section such as Section E, and carefully considered the effects on the related environmental topics such as heritage, in the relevant ES chapters (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]). Our decision making and how the Holford Rules informed decision making is set out in documents including 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and

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		with the application for development consent (5.15 Design Development Report [APP-122])
Historic Environment	There are a number of listed buildings in various degrees of proximity to the proposed pylon route. The proposed NG route runs close to two listed properties, Newneys Farm (APP029E) and Fairstead Lodge Farm to the north of Fuller Street. and two others, Herons and The Old Stores within the village itself. Additionally, to the East of our area, at Great Leighs, the proposed route cuts directly across several protected lanes (including Cole Hill and Paulk Hall Lane). Of note are the listed properties, with Historic England ID in brackets, known as:- Newneys Farmhouse (ref 1123450), Fairstead Lodge (ref 1146798), Bishops Hall Cottages (Ref 1122129), Dines Hall (ref 1123448), Blixes Farmhouse (ref 1123460), Beauchamps (ref 1123454) and Great Warley Hall (ref 1123449). Landscape and setting in our rural landscape is an important part the attraction	Regarding the listed buildings The Herons (1337781) and The Stores (1146812), the Applicant has already addressed and reviewed their assessment in an earlier response within this document. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. The Applicant has reviewed the assessment of the following assets, Newneys Farm (1123450), Dines Hall (1123448), Blixes Farmhouse (1123460) and Great Warley Hall (1123449), in light of the respondent's comments and agrees that their setting extend to the Order Limits and that the line of pylons in the distance may potentially be seen from them. For Newneys Farmhouse and Great Warley Hall the Applicant is satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of moderate adverse significance of effect (construction phase) and of minor adverse significance of effect (operation phase) as well as in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of mid less than substantial harm (construction) and Lower Less Than Substantial Harm (operation), are appropriate. For Dines Hall, the Applicant is also satisfied that the conclusion reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of moderate adverse significance of effect for both phases) as well as in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of mid less than substantial harm for both phases, are appropriate. Where a mid-level less than substantial harm conclusion has been reached for the construction phase impacts in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], these impacts would be temporary, and the construction related elements of the Project would be reinstated

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	of those premises so listed to the Essex rural context. The proposed alignment for the pylons to the west of Cole Hill has been designated as ancient agricultural land by the Department for Environment, Food and Rural Affairs. Essentially, the landscape in this part of Essex is flat with wide horizons. The NG proposals will dominate the western horizons (residents and visitors now appreciate these pylons are set to be amongst the highest in western Europe). NG should comment how it intends to ameliorate the harm and the impact their proposals will cause in perpetuity to individual heritage assets. We are particularly concerned about residential visual amenity, and the reduction in values to properties adjacent to the pylon alignment.	following completion of construction. It is not considered necessary to microsite all temporary elements of the works. However, 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. Changes to temporary construction works were considered as part of this. The conclusion reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of minor adverse significance of effect for both phases) as well as in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of lower less than substantial harm for both phases, for Blixes Farmhouse are also appropriate The Applicant has also reviewed the assessment of the following assets, Fairstead Lodge Farm (1146798), Bishops Hall Cottages (1122129), Beauchamps (1123454) and West of Cole Hill (6055) in light of the respondent's comments. The Applicant has concluded that due to topography and restricted visibility to the project, the settings of these assets do not extend to the Order Limits. As stated in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], assets where settings do not extend to the Order Limits such as Fairstead Lodge Farm, Bishops Hall Cottages, Beauchamps and West of Cole Hill, are not included in the baseline or assessment in this chapter, as there would be no potential for effects resulting from the Project. However, they are assessed and described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The protected lanes Cole Hill (6600) and Paulk Hall Lane (6601) are part of the non-designated heritage assets which have been assessed. Their value assessment is in accordance with 6.19 Scoping Report – Appendix A [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] and the methodology sets out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

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		The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. 7.4 Outline Landscape and Ecological Management Plan [Revision C] include measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. The protected lanes were assessed to have a low value. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in paragraph 5.9.9: <i>'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES'</i>. In several places, NPS EN1 (2024) refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to these two protected lanes. 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), contain an assessment of the visual impacts of the Project on residential properties within 200m of the Project centreline, to determine whether there are likely to be any breaches of the Residential Visual Amenity Threshold (RVAT), as described in Landscape Institute Guidance Note (LI TGN) 2/19 'Residential Visual Amenity Assessment (RVAA)'. No residential properties within the Terling or Fairstead Parish Boundaries fall within this study area. Whilst it is recognised that properties beyond 200m of the Project centreline may experience changes to visual

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		amenity, the effects are not expected to be so great that they would breach the RVAT, and they have therefore not been included in this assessment.
Socio-economics, Recreation and Tourism	Impact to Businesses There are a number of businesses in Fuller Street which will be affected both in the short, and long, terms by these proposals, namely The Square and Compasses Public House, Hillside Motors Alan Parris Garage and Mike Kent Honey and Natural Soaps. In Ranks Green we have a major employer, C. Humphreys, abattoir, butchers and farm shop. Access routes to businesses, including roads and footpaths, will be obstructed, impacting staff and customer movement.	Through the routing and siting exercise the Applicant has sought to reduce as far as practicable impacts on businesses, recreation and tourism assets. Reduction in these impacts would be considered during the detailed design process. Effects on local businesses, recreation and tourism assets are presented within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. No significant adverse effects have been identified for community facilities, business premises and recreational routes located within Terling and Fairstead Parish Council. In addition, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329] provide good practice and standard control measures to reduce and mitigate potential impacts and / or disruptions that may arise during the construction phase. The Project is anticipated to generate direct, indirect and induced employment during construction. The Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual Project and separate to any commitments under the proposed Development Consent Order (DCO) for this Project. Post-construction job opportunities are limited given the nature of the Project, however, the Applicant will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure the Applicant leaves a lasting positive legacy in the communities where they operate. With regard to a delivery mechanism, the above measures will be delivered as part of a community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a

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		matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance⁸¹. Beyond the individual project level, the Project is part of The Great Grid Upgrade (TGGU), the largest overhaul of the electricity grid in generations and one of the UK's biggest engines of economic growth. In addition to supply chain growth, investment in skills and creation of high-quality jobs, TGGU will connect more secure, cleaner, home-grown energy that will stimulate national and regional growth and underpin the UK's competitiveness in a rapidly electrifying global economy. Overall, investment in Great Britain's electricity networks is set to contribute £18.4bn to GDP annually from 2024–2035.
Traffic and Transport	As mentioned above, the disruption caused by road closure during the undergrounding of the existing 132Kv UK Power Networks Pylon Line at Fuller Street where the road will need to be closed comes with very significant impacts to local businesses	The Applicant has produced two documents, 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311], which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to the relevant Local Planning Authority for approval post DCO consent. Effects on local businesses are presented within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. No significant adverse effects have been identified for business premises located within Terling and Fairstead Parish Council
Land Use	The loss of agricultural food producing land both temporary and permanent is a feature of the NG proposals. Compensation will be a matter for those landowners' representatives and we have	The Applicant has taken into consideration the location of existing and proposed land use, including agricultural use and associated food production, in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-

⁸¹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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	encouraged those concerned to engage Land Agents to act on their behalf. Similarly, disruption to farming during the construction years must be minimal. Agricultural operations must have full access to the public highways and farm and field gate access at all times.	358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. All agricultural land required on a temporary basis will be returned to its pre-construction condition, which includes Agricultural Land Classification grade which relates to the potential productivity of the land. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner. The Applicant will continue to engage with affected landowners as the Project progresses to detailed design and construction to consider matters such as access arrangements, construction methodology and localised mitigation were reasonably practicable. Any matters relating to loss or compensation arising from the positioning of the pylons would be addressed separately under the statutory Compensation Code.
Good Design	We again draw attention to the HM Treasury calculation of Net Present Value for 40 years. Are we to have some confidence the NG proposals have a limited life?	7.19 2023 — Strategic Options Backcheck and Review [APP-357] Appendix C “Technology Overview” pages C1-C10 set out detail on all technology alternatives including the technology design life that derives the 40-year life referenced across all technologies.

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Biodiversity, ecology and nature conservation	Biodiversity Impact The 'East Atlantic Flyway' migratory bird route which covers this part of Essex has been recommended by the Department for Culture, Media and Sport as a site to be considered by UNESCO for its World Heritage Status. This status, if granted, recognises places that are of "outstanding universal value to humanity" and should be protected. We have huge flocks of geese at risk of 'bird strike' if this pylon alignment were to proceed. They gather in fields identified as pylon locations, directly on the East Atlantic Flyway. Environmental Impact We are concerned about the possibility of destructive environmental impacts to flora, fauna and wildlife. Bats are present along the proposed alignment and destruction of their habitat would contravene regulations.	The proposed UNESCO World Heritage East Coast Flyway is largely defined by designated sites of International Importance including Special Protection Areas (SPA) for avian interest, Ramsar Convention Wetlands and Special Areas of Conservation. The effects on such 'European Sites', including an assessment on collision risk, is presented within the 5.3 Habitats Regulations Assessment Report [APP-082]. The Project is outside the Impact Risk Zone for most coastal European Sites, however the Stour and Orwell Estuaries SPA/Ramsar and the Thames Estuaries and Marshes SPA/Ramsar were considered at Stage 1 Screening, with the former also progressed to Stage 2 Appropriate Assessment within the 5.3 Habitats Regulations Assessment Report [APP-082]. Vantage point surveys did not identify areas of notable concern with regards to collision with overhead line sections within the Impact Risk Zone of the Stour and Orwell Estuaries SPA/Ramsar, however on a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at Ardleigh Reservoir. Functionally linked land for lapwing and golden plover was identified in the vicinity of the River Stour through wintering bird surveys. This area is proposed for underground cabling. It was demonstrated at Stage 2 Appropriate Assessment, that there is extensive alternative habitat for these species within the River Stour catchment and as the works are temporary at this location (with habitats reinstated following installation of underground cables), there would be no adverse effects on the integrity of the Stour and Orwell SPA/Ramsar site. This conclusion was agreed with Natural England. Overall, the evidence indicates the Project does not pose a significant collision risk nor does it compromise established movement corridors for migrating and commuting birds.

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Biodiversity, ecology and nature conservation	We would expect that the proposed removal of native hedgerows to make way for the visual splays for the haul and access roads will not take place in the nesting season for the protection of birdlife. Construction traffic and haul roads will damage soil affecting the long-term usability of the land. The negative effects of floodlights on wildlife during the proposed hours of operation during the construction phase needs to be considered.	The 7.4 Outline Landscape and Ecological Management Plan (Revision D), as agreed with the local planning authorities, includes measures to avoid nesting birds during vegetation removal or management. This will be applicable to hedgerow removal/management required for access points and visibility splays. The potential impact of lighting on ecological receptors, most notably bats, badger and otter, during both construction and operation has been fully assessed within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. There will be no significant residual effects on ecology receptors, as a result of construction or operational lighting following the implementation of mitigation measures. 7.2 Outline Code of Construction Practice (Revision C) contains detailed, project-wide commitments on lighting, including: - Use of the lowest safe luminosity - Directional and shielded lighting to minimise light spill - Switching off or using motion sensors when not in use - Specific measures to protect ecological receptors (e.g., bats) and minimise visual intrusion - Compliance with best practice guidance (e.g., that provided by Institution of Lighting Professionals and Bat Conservation Trust). The commitments above are set out in Table 6.1 (GG26, B06, LV03) of 7.2 Outline Code of Construction Practice (Revision C). Requirement 4 of 3.1 Draft Development Consent Order (Revision C) mandates that all construction works must be carried out in accordance with the approved Code of Construction Practice (and its appendices and sub-plans) which must be 'substantially in accordance with' 7.2 Outline Code of Construction Practice (Revision C). Soil management measures to be implemented during construction across the Project, including across Terling and Fairstead Parishes, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the

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		stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures, including the proposed Aftercare Plan, will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Landscape and Visual	Harm to Landscape Holford Rule 7 relates to residential and recreational land and states that comparative costs of undergrounding should be considered. With this in mind we request that the visual impact and harm to the landscape and thus enjoyment of The Essex Way and other PROW are considered. Holford Rule 7 also states that alternative tower designs should be considered where they are visually advantageous. Again, we would have expected this running past listed buildings and PROW. Whilst alternative pylon designs were mentioned during the two non-statutory consultations there is scant reference to them now.	Effects on landscape and visual receptors at Fuller Street are set out in the row above. Holford Rule 7 states: <i>'Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.'</i> It is not considered that Holford Rule 7 applies in this location, which is rural rather than urban. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way¹. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. There are two locations where the Applicant is proposing to change to the low-height lattice design. These are Little Waltham (sheets 3 and 4 of 2.3 Works Plans - Section F [APP-022]) for heritage reasons and keeping heights below and out of the view of some gardens, and the other location is Thurrock due to technical reasons for the airfield (sheets 1 and 2 of 2.3 Works Plans - Section H [APP-024]). T-pylons are considered in locations where the mitigation hierarchy identifies that lattice pylons are unacceptable. The Applicant did not identify any locations that met this on the Project.
Good Design	Holford Rule 5 stipulates that, where possible, pylons are placed in valleys, prominent ridges are avoided, woodland is avoided, and everything possible is done to protect	7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision

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	woodland and hedgerows and safeguard visual and ecological links. Yet the proposed route through Fairstead and Great Leighs cuts through woodland, field hedgerows and protected lanes with ancient hedgerows. We cannot see any effort being made to protect visual and ecological links. The pylon route will be visible from the PROW Essex Way and Grade 1 Listed St Mary's Church in Great Leighs. The proposed road crossing at Cole Hill in Great Leighs will dwarf residential properties which currently sit some 10m lower than field level in the protected lanes.	making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. All ancient woodlands around Fairstead and Great Leighs have been carefully avoided by the Project, despite there being a significant number within a short section between TB-116 and TB-125. Other priority woodland and hedgerow habitat have also been avoided or impacts minimised where practicable. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors including priority habitats such as woodland and hedgerows. Full details on the priority habitats in the area are presented within 6.8.A1 ES Appendix 8.1: Habitat Report [AS-028]. The 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain relevant good practice measures to avoid or reduce impacts on ecological features and mitigation measures as appropriate. This includes procedures for replacement planting. The protected lanes are part of the non-designated heritage assets which have been assessed. Their value assessment is in accordance with 6.19 Scoping Report – Appendix A [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] and the methodology sets out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and Environmental Statement Chapter 13 - Landscape and Visual [APP-226].

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		7.4 Outline Landscape and Ecological Management Plan (Revision D) includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice (Revision C). The protected lanes were assessed to have a low or negligible value. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in paragraph 5.9.9: <i>'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES'</i>. In several places, NPS EN1 (2024) refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets including the protected lanes. The Applicant has reviewed the assessment of the Grade I Church of St Mary the Virgin (1171104) in light of the respondent's comment and is confident that the setting of this asset does not extend to the Order Limits, due to screening by Lyons Hall, its outbuildings and mature grounds to the west, and the landscape's topology and mature vegetation to the north. the Applicant is confident that intervisibility alone does not mean the setting of the asset extends to the Order Limits. The setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development. In line with established heritage guidance, the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits despite some visual connection. PRoW are not considered as part of the historic environment assessment, in accordance with the scope agreed in 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and through regular engagement with historic environment

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		stakeholders throughout the pre-application stage of the Project. The Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] considers the effect of the Project on the visual amenity of people using PRoW. This is in accordance with the approach set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], which is in line with professional guidance in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and Clarification Notes. The LVIA does not consider PRoW as features in their own right. Effects on visual receptors within Terling and Fairstead Parishes, are set out under Visual Receptor Areas (VRAs) E5, VRA E6, VRA F1 and VRA F2 in paragraphs 13.8.47 to 13.9.24 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. This includes an assessment of effects on users of PRoW and the Essex Way. Effects on visual receptors would be significant within approximately 1.5 km of the Project. A sequential assessment of effects on recreational receptors using the Essex Way is set out in paragraphs 13.12.84 to 13.12.121 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229].
Cumulative Effects	We are concerned that with the Development Consent Order recently granted for Longfield Solar Farm to the South of Fuller Street (Fairstead), and with the proposed pylons to the north, and the existing power lines running North to South, this rural area is being 'industrialised' with the subsequent loss of amenity, spoiling natural vistas in a beautiful, rural, part of Essex.	The cumulative effects assessment follows Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment' and is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The Cumulative Effects chapter has assessed the potential intra-project cumulative effects and inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in 6.17.A1 Appendix 17.1 – Inter-Project Cumulative Effects [APP-282]. The assessment of clusters of other developments on common receptors can be found in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The Longfield Solar Farm development has been considered within the inter-project cumulative assessment, referred to as DCO13 within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. There would be significant adverse effects on landscape and visual receptors within Visual Receptor Area (VRA) F2 Peverel's Farm, the western edge of VRA E6 Terling and Witham and Landscape Character Area (LCA) B1 Central Essex Farmlands during construction, should both developments be constructed at the same time. Significant

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		effects would also be experienced at operation within VRA F2, VRA F6 and LCA B1 Central Essex Farmlands. As stated in rows above, the Applicant recognises that there will be significant effects on landscape and visual receptors within Terling and Fairstead Parishes. The effects are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Existing overhead lines were considered as part of the baseline, against which the Project was assessed.
Traffic and Transport	For the record, the infrastructure in our Parish is presently country roads mainly with passing places for cars and very limited two-lane carriageways. There will be a requirement to have a photographic record of the roads, footpaths, hedges and greenswards prior to works and at completion. A planting/replanting programme of native species needs to be confirmed. We have been informed by NG that none of the haul roads in our Parish will become permanent private access roads although we have received less clear information about access for maintenance purposes in future years once construction is complete.	The Applicant has developed a construction routing strategy, detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The strategy proposes to use Primary Access Routes (PAR) to route construction traffic from the Strategic and Major Road Network, to site access points. From the site access points, construction traffic will route along the internal haul road. The Applicant is not proposing any PARs within the Terling and Fairstead Parish. The closest access points to the Parish is on PAR 43 (Spinks Lane / Highfields Road / Spa Road / Flora Road / Faulkbourne Road / Church Hill) as illustrated in Figure 1 Page 22 of 30 7.11 Transport Assessment Appendix I Figures [APP-342]. As set out in Section 5.2 of 7.3 Outline Construction Traffic Management Plan (Revision B), the Applicant is proposing to undertake pre and post construction surveys on routes anticipated to be used by construction HGVs and AILs. The scope of these surveys (in terms of the routes covered and the methodology of these surveys) is to be agreed with each Local Highway Authority. In accordance with mitigation measure GG06 in the 7.2 Outline Code of Construction Practice (Revision C) a record of condition will be carried out (photographic and descriptive) of the working areas that may be affected by construction activities. Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries and the drafting of Requirement 9 of the 3.1 Draft Development Consent Order (Revision C) confirms that reinstatement planting works will be implemented at the earliest opportunity. With respect to the respondent's comment on permanent access arrangements, the Applicant draws attention to Pages 45 and 46 within Section E of 6.4.F2 Environmental Statement Figure 4.2 – Proposed Project Design – Permanent Features [APP-134]. These sheets show the proposed permanent access arrangements in the vicinity of Terling and Fairstead,

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	Additionally, we would seek to attend engagement meetings between Essex Highways and NG prior to commencement of any work of enablement.	including proposed permanent access easements (no physical works) for the proposed overhead line alignment, and the proposed permanent access point for the two proposed Fairstead CSE Compounds, which is denoted as TB-B079 on Sheet 45. Of these, the proposed permanent access point TB-B079 also forms part of the proposed temporary construction access arrangement, as can be seen from Page 45 within Section E of 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]. As set out in Paragraph 4.9.11 of 6.4 Environmental Statement Chapter 4 - Project Description [App-130], the permanent access road for the CSE Compounds would be up to 5m in width with a bound asphalt or concrete pavement. Operation and Maintenance requirements are discussed within Section 4.10 of 6.4 Environmental Statement Chapter 4 - Project Description [App-130]. Paragraph 4.10.6 establishes that the proposed permanent accesses would be utilised for regular inspection activities, either utilising light vehicles or teams working on foot. The appointed Main Works Contractor(s) will develop the final CTMP in agreement with Essex County Council prior to each stage of the authorised development. It is envisaged that the Parish Councils will receive information during construction through letter drops/emails and local signage. Information on any impacts will be shared with the Parish Councils. Additional information is detailed in Section 5.12 7.3 Outline Construction Traffic Management Plan (Revision B).
Socio-economics, Recreation and Tourism	Community Groups and Bus Services There are isolated settlements within our Parish, and we have a dedicated band of volunteers to bring aged or infirm parishioners to meetings, doctors' appointments etc. The possible disruption (or cancelation) to fellow parishioners to provide these services by NGs proposals need to be	The Applicant notes the comment. In line with AS03 measure detailed in 7.2 Outline Code of Construction Practice (Revision C), where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction period. Where road closures are proposed, a full point to point diversion will be provided (detailed in 7.3 Outline Construction Traffic Management Plan). The proposed diversion routes are detailed in Section F of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-038]. The proposed diversion for Fuller Street follows lines SMD-F-002, SMD-F-001 and SMD-F-003. The Applicant will keep local residents informed of the commencement and likely duration of the construction activities through a letter drop/email notifications. It is anticipated that the letter(s)/email(s) will be tailored to a specific area, reflect the works to be carried out and the duration of works.

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	sympathetically assessed and contingency plans established. The bus service does provide a valuable service to further reduce rural isolation. The introduction of the Braintree DigiGo bus service initiative to Fairstead including Fuller Street and Ranks Green and outlying houses is a further initiative to reduce rural isolation. We would not like to see any harm to the bus service or the DigoGo initiative or access and availability stymied by NG's works of enablement or construction.	Where temporary road closures and diversions are necessary, these are expected to be for a duration of up to four weeks. When considered in the context of other major infrastructure projects, the residual effects for driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The Applicant has developed a construction routing strategy, detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The strategy proposes to use Primary Access Routes (PARs) to route construction traffic from the Strategic and Major Road Network, to site access points. From the site access points, construction traffic will route along the internal haul road. The Applicant is not proposing any PARs within the Terling and Fairstead Parish. Therefore, there would be no delay to DigiGo Bus services within the Parish. The closest PARs to the Parish are on PAR 43 (Spinks Lane / Highfields Road / Spa Road / Flora Road / Faulkbourne Road / Church Hill), PAR 41 (B1018 Braintree Road / B1018 Witham Road) and PAR 42 (B1389 Hatfield Road) to the east, and PAR 44 (A131 Great Notley Bypass / A131 Great Leighs Bypass / A131 Braintree Road) to the west, as illustrated in Figure 1 Page 21 and Page 23 of 30 in 7.11 Transport Assessment Appendix I Figures [APP-342].
Consultation	Consultation Process It is clear that this consultation fails at least two of the Gunning Principles. Gunning Principle 1 requires consultations to be held when a proposal is at a formative stage. However, it is apparent that NGET had made its mind up about the Norwich to Tilbury overhead lines project long before the first non-statutory consultation in 2022. All subsequent back checking has simply been a post-	The Applicant does not agree that the consultation process fails to meet the Gunning Principles. The Project comprises a proposed overhead line connection of over 2 km in length and is therefore classified as a Nationally Significant Infrastructure Project, requiring development consent under the Planning Act 2008. The Government and the Planning Inspectorate publish statutory guidance and advice for developers on the preparation of NSIP applications, and that guidance has been developed with specific regard to the application of the Gunning Principles in the NSIP context. The Applicant has developed its proposals and carried out consultation in accordance with this statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application for examination, having regard to the adequacy of the Applicant's pre-application consultation. The Applicant considers that consultation on the Project took place at a formative stage. A staged programme of non-statutory and statutory consultation has been undertaken to

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	justification exercise. There has been no consultation on alternatives at any stage and a decision about a preferred option had been made prior to the first consultation. Gunning Principle 2 requires that there is sufficient information to give 'intelligent consideration'. In the case of this statutory consultation there is only skeleton costing information available such that it is impossible to give intelligent, or indeed any, consideration to discarded alternatives proposals. This is a major failing of this consultation. We felt the consultation material provided was not easy to interpret and many in our community have struggled to access the on-line material making informed response extremely challenging. The overwhelming amount of physical documents available to view at Chelmsford Library were no less of a challenge. This has limited stakeholders' ability to interact meaningfully with the presented consultation documents. The visual fly-through provided at the PIE	inform and influence the development of the proposals. At the time of the first non-statutory consultation in 2022, no fixed route had been selected. Consultation was undertaken on a wide study area and emerging options, enabling stakeholders to comment on constraints, sensitivities and local issues before an emerging preferred corridor was identified. Feedback received through non-statutory consultation has informed the evolution of the proposals, including refinements to corridor width, pylon spacing, route alignment and the scope of further assessment work. The identification of an emerging preferred corridor does not indicate that decisions had been pre-determined. Rather, it reflects a necessary and iterative step in the NSIP design process, allowing further assessment and consultation to be focused while retaining flexibility to refine the proposals in response to feedback. This approach is consistent with the Planning Act regime and established practice for linear infrastructure projects. The Applicant considers that sufficient information has been provided to enable consultees to give intelligent consideration to the proposals and the alternatives assessed. Information on alternatives, including routeing, technology and design options, has been made available through consultation materials and supporting technical documents, including the Strategic Options Report and routeing and siting assessments. These documents explain the factors considered in identifying preferred options, including environmental, technical, cost, policy and deliverability considerations. The level of cost information presented at statutory consultation was proportionate and appropriate to the stage of design, recognising that detailed cost estimates are refined as proposals progress and were not fixed at that stage. The Applicant recognises that consultation materials for a project of this scale are necessarily extensive. To support accessibility, information was provided in a range of formats, including summary documents, online materials, interactive mapping, staffed public information events, and hard-copy documents at deposit locations. A hotline and project email address were available throughout the consultation period to allow consultees to seek clarification where required. Where issues were identified, including matters relating to online mapping functionality, these were addressed as soon as practicable, demonstrating a responsive approach to consultation. Public information events were arranged to provide opportunities for engagement across the route, taking account of venue availability, accessibility and geographic spread. These events were supported by online consultation materials to ensure that those unable to

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	were poor and hard to decipher and in many instances inaccurate – landscape was misrepresented and distances and scales grossly misleading. Opinions were therefore formed based on false premises. Direct questions put to representatives at the PIE events in both Chelmsford and Witham could not be answered (indeed, at Chelmsford a vital map could not even be found). We were referred to the 0800 915 2497 phone enquiry line which had a slow response time and when responses were eventually forthcoming they were incomplete and frustratingly vague without the level of detail we sought. During the first two weeks of the consultation the existing overhead power lines could not be viewed on the interactive online maps. Admittedly this was rectified after we complained but by this point many people had looked at the maps and formed opinions without appreciating the massing of power lines along the proposed new alignment. The location of the PIE in	attend in person could still participate. Given the linear nature of the Project, it is not possible to locate events adjacent to all parts of the route; however, the Applicant considers that the overall approach provided reasonable and proportionate opportunities for engagement. Representatives were available at events to explain the proposals and respond to questions, and where detailed technical information could not be provided immediately, follow-up channels were offered to ensure accurate responses. Visualisations and fly-through material were provided to assist understanding of the proposals at a strategic level. These materials were indicative and intended to support engagement rather than represent final detailed design. The Applicant does not accept that consultees were asked to form views on the basis of misleading information. Overall, the Applicant considers that consultation has been undertaken in accordance with the Gunning Principles, the Planning Act 2008 and relevant statutory guidance. Consultation has been carried out at a formative stage, alternatives have been considered and explained, and consultees have been provided with sufficient information and multiple opportunities to engage meaningfully. Feedback received continues to inform the refinement of the proposals as the Project progresses. A detailed response on the application of the Gunning Principles is provided in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007].

Topic	Comment	National Grid's response
	Chelmsford and Witham were far from the proposed alignment and were impossible to access by public transport, leading to reduced participation. Signage to, and at, both these PIEs was non-existent.	
Cumulative Effects	Finally, with construction anticipated to commence in 2027 this would conflict with the both the A12 widening project and the Longfield Solar Farm installation in our area. The Development Consent Order (DCO) for the widening of the A12 consented by The Secretary of State, which is currently under Judicial Review, includes traffic diversions through the core of the village of Terling and surrounding settlements and restricted access to and from Witham and Hatfield Peverel, for a period in excess of 12 months. NG, we hope, are further aware of the Longfield Solar Farm DCO consented by Secretary of State and the programme for that scheme, works of	An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The Cumulative Effects chapter has assessed potential intra-project cumulative effects and inter-project cumulative effects. The detailed assessment of the Project with other developments can be found in 6.17.A1 Appendix 17.1 – Inter-Project Cumulative Effects [APP-282]. The assessment of clusters of other developments on common receptors can be found in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The Longfield Solar Farm development has been considered within the inter-project cumulative assessment, referred to as DCO13 within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. It is concluded that there would be no likely significant residual inter-project cumulative effects during construction or operation (and maintenance). The A12 widening project was considered within A.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283], however as of June 2025, the development had been cancelled and would not be proceeding. The Applicant understands this is still the case.

Topic	Comment	National Grid's response
	mobilisation and delivery of materials, site accommodation etc. The NG proposal for works of enablement, construction and servicing of both labour and plant needs to be considered in the light of existing DCO consents. We would expect to see joint consideration, so that the cumulative impact on the Parish of Terling and Fairstead would be minimised.	
N/A	In summary, Terling and Fairstead Parish Council strongly objects to the NG Norwich to Tilbury pylons proposals:- • The Parish Council strongly favours the 'offshore solutions' which we believe will alleviate many of the harms the current proposals will have. • The Parish Council does not believe it has been given full and accurate costings and believes the consultation process has been inadequate. • The Parish Council believes there will be a major impact on local communities and businesses, particularly on the	Noted, specific points of objection are responded to above.

Topic	Comment	National Grid's response
	hamlet of Fuller Street. Ranks Green and Fairstead (Church End) will be similarly affected. • The Parish Council believes that PROW, cycle routes, heritage, businesses, biodiversity, environment, landscape, access to the countryside, community groups and services will all be greatly affected. • The Parish Council does not believe this scheme is fit for purpose. It does not follow Holford Rules 7 and 5 and fails Gunning Principles 1 and 2. If it were allowed to proceed it would have a major negative effect on the area.	

2.57 Thurrock Council Blackshots Ward

- 2.57.1 Table 2.57 below outlines the Applicant's comments on the Relevant Representation (RR) provided by a Councillor for Blackshots Ward, Thurrock Council [RR-3666]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.57 Comments and National Grid's response

Topic	Comment	National Grid's response
Good design	I am keen to know more about the installation or replacement of pylons and lines through the ward, particularly as we are likely to see new building in one of the areas covered by your current plan.	2.3 Works Plans – Section H [APP-024], specifically Section H, which covers the Thurrock area, set out the principal permanent elements of the Project. These elements are further defined in Schedule 1 of 3.1 Draft Development Consent Order (Revision C), where the various linear and non-linear works are assigned individual work numbers. The Works Plans illustrate the alignment centrelines of the linear works forming the application, as well as the Limits of Deviation (LoD) within which the non-linear CSE compounds and substation works may be located. The Plans also identify the termination of works, installation, modification or removal of pylons. Since submission and acceptance of the DCO application, changes have been identified on the proposals at Chapel Farm. The potential requirement at Chapel Farm, and the resulting overlap between the Project Order Limits and Thurrock Council's development proposals, relate to the area needed for the installation of overhead wires, known as the 'stringing' or 'pulling' zone. This requirement only arose when the original Lower Thames Crossing (LTC) proposals involved diverting the two existing overhead lines (ZB and YYJ). We have been advised by LTC that a proposed modification to their DCO, removing the need to divert the YYJ or ZB overhead lines at Chapel Farm, has been accepted. Consequently, the land at Chapel Farm will no longer be required to be crossed by the Norwich to Tilbury Project. The aforementioned Works Plans and draft DCO document are currently undergoing appropriate updates to reflect the changes at Chapel Farm described above. The Applicant intends to submit the suite of updated documents at Deadline 5 (10 June 2026).

2.58 Tibenham Parish Council

2.58.1 Table 2.58 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Earl Stonham Parish Council **[RR-3667]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.58 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	We support the Essex Suffolk and Norfolk Pylons Action Group.	This is noted.
Consultation	We believe the consultation has been deficient since 2022.	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project requires consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Alternatives	No alternatives have been provided or discussed. Despite the call for a sub sea offshore route this has always been dismissed due to cost, and have not been listened to by the National Grid.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

	In terms of the consideration of alternatives as part of the examination of the substantive case, National Policy Statement (NPS) EN-1 (2024) indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and, second, that only alternatives that can meet the objectives of the proposed development need to be considered. NPS EN-1 paragraph 4.3.22 explains that the Secretary of State will be guided by whether there is a realistic prospect of the suggested alternative delivering the same infrastructure capacity, the same energy security, the same climate change, and the same environmental benefits as the proposal in the same timescale as the proposed development. NPS EN-5 (2024) says that overhead line is the strong starting presumption for electricity network developments in general, having regard to that duty. That strong starting position is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
Land Use Tibenham is a rural area, an area of mainly arable farming.	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Tibenham Parish (Grade 3a and Grade 3b). The Applicant has sought to minimise impacts on BMV agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including

		farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.
Landscape and Visual	The landscape is mainly flat fields with little tree cover. The route of the pylons passes over the highest part of the village with no tree cover to shield the pylons which will totally dominate the view.	The Applicant notes the concerns raised. Effects on visual receptors within Tibenham Parish are set out under Visual Receptor Areas (VRAs) A7 and A8 in paragraphs 13.4.72 to 13.4.95 in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. VRA A8 is noted to comprise ‘<i>a flat, elevated plateau which falls towards the Tas Valley to the north</i>’ (paragraph 13.4.84) and has ‘<i>a large scale and open character, with some long views</i>’ (paragraph 13.4.85). Some areas are more wooded, for example at Cargate Common in the north. Effects on landscape receptors within the parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Area (LCA) E2 Great Moulton Plateau Farmland and LCA B1 Tas Tributary Farmland in paragraphs 13.3.97 to 13.3.125. Significant effects are identified on landscape and visual receptors within approximately 1.5 km of the Project. Views within Tibenham Parish are represented by Viewpoint 1.09 PRoW west of Tibenham (Tibenham FP4), Viewpoint 1.10 Diss Road, south-west of Tibenham and Viewpoint 1.11: B1134 Long Row, Gissing Common and as set out in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229].
Historic Environment	The village was mentioned in the domesday book and has a long history of farming and Royal links, with a significant number of listed buildings, many close to the line of pylons.	The Applicant acknowledges that the settings of some listed buildings within Tibenham Parish fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these

		assets falls within the Order Limits. The Applicant is confident in the assessment that the Project would lead to no harm or less than substantial harm to listed buildings within Tibenham Parish. Embedded and standard mitigation proposals for listed buildings are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given that the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.
Biodiversity, ecology and nature conservation	There is a wealth of wildlife, including deer (3 species), predatory birds and bats, due to the number of old buildings and barns.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity, including protected species such as bats and birds. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity including protected species and their associated habitats, through avoidance or mitigation. A comprehensive survey effort for a range of protected species was completed over the 2023 – 2025 period. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on protected species based on this baseline information. No buildings/barns will be lost as a result of the Project and therefore surveys for roosting bats have focused on trees as potential roost features. Currently, no tree bat roosts have been identified within the Order Limits in proximity to Tibenham. Mitigation for protected species has been included within 7.4 Outline Landscape and Ecological Management Plan (Revision D). Suitable mitigation for roosting bats, including pre-commencement surveys, have been developed in consultation with Natural England to ensure legal compliance and best practice guidelines are adhered to. Deer are not listed as protected/priority species under Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. Deer are widespread, highly adaptable, and capable of moving freely through a variety of habitats without assistance.

	The proposed construction works would not create barriers that would impede their movement significantly. The Tibenham area supports a diverse range of habitats suitable to support predatory bird species. Predatory bird species typically associated with old barns and buildings, including barn owl and kestrel, have been specifically considered through 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [AS-030] and the wider 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Targeted breeding bird surveys and detailed constraints mapping identified confirmed and potential nesting and roosting features within and adjacent to the Order Limits. The assessment considered the risk of direct habitat loss, disturbance and displacement from construction activities, particularly where works are located close to retained buildings, trees or structures suitable for nesting or roosting predatory birds. In addition to reinstatement of temporarily lost habitat post construction, species-specific mitigation is secured through 7.4 Outline Landscape and Ecological Management Plan (Revision D), including pre-construction checks by suitably qualified ecologists, appropriate standoff distances, timing restrictions, and where necessary the provision of alternative nesting or roosting features. For barn owl, this includes licensed surveys and the installation of replacement barn owl boxes where loss or disturbance of features cannot be avoided. With these measures in place, it was concluded that effects on predatory birds associated with barns and buildings, including barn owl and kestrel, would be reduced to a negligible magnitude, with no significant residual effects.
Safety and Security	There are two airfields in Tibenham, Tibenham airfield, and Priory farm airstrip which is very close to the proposed line of pylons. Tibenham airfield, originally started in 1917, a WW2 bomber base, and now home of the Norfolk Gliding Club. This is a busy airfield and a designated emergency landing site. Priory airfield is home to 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] describes the consultation approach undertaken to inform the Applicant's assessment of aviation impacts in accordance with its responsibilities as defined in the Overarching National Policy Statement for Energy (EN-1 (2024)), recognising aerodrome operator responsibilities for safeguarding, the Civil Aviation Authority's (CAA's) regulatory responsibilities relating to licensed and officially safeguarded civil aerodromes, and the separate remit of the now disbanded CAA Airfields Advisory Team to advise operators in relation to safeguarding. Paragraphs 15.4.9-15.4.11 and 15.4.22-15.4.25 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] provide detail of impact assessments relating to Priory Farm and Tibenham aerodromes respectively, recognising their proximity to the proposed Project alignment and its presence as an obstacle to aviation operations. Conclusions for both aerodromes are that

	light aircraft and microlights aircraft.	distances from the runway ends to the proposed Project are sufficient to enable safe overflight clearance margins. Furthermore, adverse effects on Priory Farm and Tibenham aerodromes, including business impacts, are summarised within 6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266] with residual effects for both aerodromes assessed to be temporary, short-term, neutral and not significant during construction; and permanent, long-term, neutral and not significant during the Project's operation and maintenance.
Traffic and Transport	Tibenham is a small village with a number of settlements away from the heart of the village. This spreading means that the significant number of proposed road closures will severely affect village life.	The Applicant is proposing a number of temporary, short term road closures within Tibenham, as noted in Sheet 8 of 2.4 Traffic Regulations Order, Section A [APP-025]. These road closures are primarily associated with the construction of the crossover bellmouths and overhead line netting activities. Where a diversion route is proposed (due to temporary closures of roads), they will adopt the principle that they will use the same standard of road, or higher where practical and available. • Mill Road: Proposed closure between TR-A-033 and TR-A-032 (2.5 Traffic Regulations Order, Section A [APP-025]). The Applicant is proposing diversion route via lines SMD-A-048, SMD-A-050 and SMD-A-049 as shown on Plan C 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section A [APP-033]. • Black Barn Road: Proposed closure between TR-A-034 and TR-A-035 (2.5 Traffic Regulations Order - Section A [APP-025]). The Applicant is proposing diversion route via lines SMD-A-051, SMD-A-052 and SMD-A-053 as shown on Plan D 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section A [APP-033]. The Applicant is proposing to use the Permit Schemes managed and operated by Norfolk County Council to coordinate the street works proposed by the Project. Further details on the proposed use of the Permit Scheme is set out in Section 2.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant does not anticipate the simultaneous use of these diversion routes. 7.3 Outline Construction Traffic Management Plan (Revision B) provides detail on how the community will be kept informed of the diversion works. The Project will adhere to the principles of the Permit Schemes and it is anticipated that this information will be publicly available on the Project website and the relevant Local Highway Authority website. The community will also be kept informed through emails/letter drops which detail the extent of the works.

	Temporary road closures with diversions within the Parish are necessary and may be for a duration of up to four weeks. When considered in the context of other major infrastructure projects, this has been considered to have a slight magnitude of impact and therefore the residual effects for driver delay (journey times) are considered not significant as detailed within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].	
Land Use	As an agricultural area we have seen the damage caused to fields prepared for new crops by the archaeological survey, but with little in the way of extensive excavation. So we are aware of the problems that will be caused by Road closures during the build process.	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. The Applicant will continue to work with all landowners including farmers who may be affected by the proposals, to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements. 7.2 Outline Code of Construction Practice (Revision C) (CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in Outline CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in Outline CoCP Section 6 (Agriculture and Soils) and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in Outline CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which

set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed.

Potential disruption to communities, landowners and Public Rights of Way is managed through Outline CoCP Section 6 (Socio-economics, Recreation and Tourism) and **7.6 Outline Public Rights of Way Management Plan [APP-329]**. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison.

Construction traffic associated with access roads is controlled through **7.3 Outline Construction Traffic Management Plan (Revision B)**, with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes.

The mitigation measures and controls set out in **7.2 Outline Code of Construction Practice (Revision C)** are secured through Requirement 4 of Schedule 3 (Requirements) of **3.1 Draft Development Consent Order (Revision C)**.

Alternatives	Recently we have seen a proposal to a new offshore cable between Suffolk and Kent, suggesting that our original proposal for an off shore route to Essex was possible. Why is this new proposal cost effective, when the alternative was dismissed.	The Applicant has considered a wide range of alternative means for meeting the Project need and set these out in the Corridor and Preliminary Routeing and Siting Study (CPRSS), published in support of the 2022 non-statutory consultation (7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), and the 2023 and 2024 Strategic Options Backcheck and Reviews (SOBR) (7.19 [APP-357] and Appendix B within 7.17 [APP-355]), published in support of the 2023 non-statutory consultation and statutory consultation; and the 2025 7.17 Strategic Options Backcheck and Review [APP-355]. We have also considered feedback relating to suggested alternatives and set out responses within the 2022 and 2023 non-statutory consultation, Statutory and Targeted Consultation Feedback Reports and elsewhere within this report. Our job is to carefully consider the most feasible options and present our proposals for public consultation. The Applicant cannot present an alternative for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. The Applicant has rigorously tested all realistic alternatives to assess those impacts, including onshore AC cable, AC gas-insulated line, HVDC options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socio-economic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore

HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity.

An offshore solution capable of matching the capacity of the proposed overhead line would require three subsea cables and substantial additional onshore infrastructure. As set out in the 2024 SOBR (Appendix B of **7.17 Strategic Options Backcheck and Review [APP-355]**), the total capital cost of the overhead line options (EAN 4 and EAS 2) is in the region of £895m, compared with £4,096.5m for the HVDC Offshore 1 option (2020/21 prices). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. EN-5 also accepts that undergrounding and offshore technologies have significantly higher lifetime costs of repair and later uprating.

HVDC options are also constrained by fundamental technical limitations, including the absence of commercially available HVDC circuit breakers. Without them, highly interconnected HVDC networks cannot safely accommodate power infeed above 1,800 MW under Security and Quality of Supply Standards, as a single fault would shut down the entire system. Loss of more than 1,800 MW on the National Electricity Transmission System would cause a major frequency deviation, risking a national system outage. This currently limits both the scale and interconnectivity of HVDC solutions.

Other bodies are also in agreement that the shape of our proposals is reasonable and aligns with these requirements. Ofgem has authorised investment which has allowed us to progress the Project and the Project in its current form has also been given ‘proceed’ signals by NESO.

Given the level and urgency of need for new energy infrastructure, EN-1 states that consideration of alternatives must be proportionate, and that only alternatives that can meet the objectives of the proposed development need to be considered. These objectives include security and affordability. Policy also requires consideration of whether it is realistic that alternatives could deliver the same infrastructure capacity (and address energy security, climate change and other environmental benefits) in the same timescale as our proposals.

Furthermore, a delay to the Project would result in additional cost to the consumer. Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.

Accordingly, and in line with EN-1 and EN-5, we have applied the starting presumption in favour of overhead lines where appropriate, reversed that presumption within designated National Landscapes, and included targeted undergrounding where justified. The Applicant pursuing an offshore or HVDC alternative for this Project would be contrary to the strong presumptions set out in policy and would not allow us to meet the Project objectives.

2.59 Wenham Parva Parish Meeting

2.59.1 Table 2.59 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Wenham Parva Parish Meeting **[RR-3808]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.59 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Needs Case	At all parish meetings that have been convened since 2022, there was an acknowledgement of the need for greener energy to be both generated and distributed throughout the country in response to growing need; it was agreed unanimously that pylons are not the appropriate response in the 21st century. Ideally it was agreed that the transmission of energy from wind farms in the North Sea should be via an integrated off shore grid. However, National Grid has always maintained that this is impossibly expensive.	The Applicant notes the respondent’s feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the Strategic Options Backcheck and Reviews (SOBRs) published in 2023 (7.19 2023 - Strategic Options Backcheck and Review [APP-357]) and 2024 (an appendix to 7.17 Strategic Options Backcheck and Review [APP-355]) and the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). This sets out the need case for the Project and the reasoning why an onshore solution (including a mix of overhead lines and underground cable) has been taken forward. The Applicant has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). The Project would facilitate the connection agreements that are in place with two offshore wind farm projects and an interconnector project based on their connection into a new East Anglia Connection Node (EACN) Substation. The Project would also reinforce the local transmission network which currently does not have the capacity needed to reliably and securely transport all the energy that is likely to be connected in the future – driven by the government’s plan to increase offshore wind from the current 8.5 GW to 50 GW by 2030 to meet the increased demand. This ambition has been emphasised in the National Energy System Operator’s (NESO’s) Clean Power 2030 report ⁸² . The need case is reviewed at each critical stage of the Project’s development and without a robust demonstrable need, the Project would be revised or fall away. Currently, the contracted generation shows a clear need for the Project.
Cost	We should point out that National Grid has never	The Applicant notes the respondent’s feedback. Construction costs are included in the overall estimated costs of each strategic option. This is set out in 7.17 Strategic Options

⁸² National Energy System Operator (2024) *Clean Power 2030*

Topic	Comment	National Grid's response
	released any figures of which we are aware to support or undermine their conclusions.	Backcheck and Review [APP-355] (2025 SOBR). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and regulatory framework. Where the cost of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. Throughout, the Applicant has engaged with the government and our regulators regarding policy and costs for new infrastructure. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project and are contained within the 2025 SOBR (7.17 Strategic Options Backcheck and Review [APP-355]). These alternative technologies included an offshore connection using Direct Current (DC) technology, and various onshore connection options including increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and Gas Insulated Line. Currently, overhead lines offer the most economic and efficient solution to transmit electricity over long distances. A full and transparent cost model is provided in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355], which sets out in transparent detail how options appraisal costs were evaluated.
Alternatives	Thanks to the independent review, instigated in Parliament the Electricity System Operator has identified a financially viable alternative to the pylons, namely fully undergrounded HVDC cables.	The Applicant considered alternatives in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages.

Topic	Comment	National Grid's response
		Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers, offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Biodiversity, ecology and nature conservation	The damage to the natural environment of a rural county like Suffolk will be permanent and immeasurable. The county will be bisected north to south by the pylons. To the east of the pylon route is the massive construction work for Sizewell C. Thousands of trees have already been felled and planting replacements fails to take into account the decades of beneficial growth contained in those felled trees. The disruption to everyday life and the very significant degradation of the county's natural environment is difficult, if not impossible to justify on any reasonable grounds.	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6 of the DCO application) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. Impacts on habitats and protected species within the natural environment of Suffolk have been assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include mitigation measures to avoid or reduce risks to habitats (including trees) and protected species. While blocks of woodland will be mitigated/compensated through the standard multipliers applied through

Topic	Comment	National Grid's response
		the BNG metric, the Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan (Revision D), which is secured by Requirement 4 within 3.1 Draft Development Consent Order (Revision C). In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10% greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Full details are presented within 7.1 Biodiversity Net Gain Report [APP-299]. Chapter 8 of 5.6 Planning Statement [APP-085] considers the planning balance of residual impacts against the need for the Project in accordance with the NPS EN-1 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 3.2.7 of NPS EN-1 (2024) substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085]. EN-1 paragraph 4.1.7 provides '<i>[...] 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</i>'. The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5.

Topic	Comment	National Grid's response
		The residual environmental effects identified in the ES fall within the category of non-HRA or non-MCZ impacts where, following the application of the mitigation hierarchy, the further CNP presumption in favour of the Project applies to the planning balance and outweighs such residual effects.

2.60 West Bergholt Parish Council

- 2.60.1 Table 2.60 below outlines the Applicant's comments on the Relevant Representation (RR) provided by West Bergholt Parish Council **[RR-3809]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.60 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	I am writing to you on behalf of West Bergholt Parish Council (the Council) to advise you that the said Council endorses entirely the position of the Essex, Suffolk and Norfolk Action Group as submitted to you through the examination process. The Inspector will be aware that the Council has already submitted a comprehensive objection to the Scheme however, and for the sake of good order the Council reiterates below the principle (but not exclusive) reasons for the Council's objections to the Scheme and these are:	Noted.
Planning policy	1. The Planning Application as submitted by National Grid does not conform to the National Policy Statement for Electricity Networks EN-5 and in particular section 2.9.12 which states that:	The Applicant notes the respondent's feedback. Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by National Policy Statements EN-1 (2024) and EN-5 (2024). However, national planning policy in the form of the National Planning Policy

Topic	Comment	National Grid's response
	--even residual impacts (on the environment) may well make an overhead line proposal unacceptable in planning terms" In view of the fact that the scheme as proposed will impinge heavily on West Bergholt and its environs we submit that the proposal has no standing in Law.	Framework⁸³ (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. 5.6 Planning Statement [APP-085] should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. The Applicant has developed the Project in line with the relevant planning policy which is set out in the NPS EN-5 (2024). Paragraph 2.9.12 refers to paragraph 2.9.20 for guidance, paragraph 2.9.20 sets out the strong starting presumption for the use of overhead lines for electricity network developments, a presumption which is reversed in nationally designated landscapes and certain other circumstances as set out at paragraph 2.9.23 and in NPS EN-1 (2024) regarding the setting of National Landscapes. The Applicant has therefore developed the Project in a manner consistent with the relevant policy.
Landscape and Visual	2. The proposed installation of 9 steel lattice pylons, each some 50 metres tall will lie broadly to the North and West of our village and will be clearly visible from most sites within the village thus impacting heavily on the Environment	The Applicant notes the concerns raised. The findings of the Landscape and Visual Impact Assessment (LVIA) are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Effects on visual receptors within West Bergholt Parish are set out under Visual Receptor Areas (VRAs) D3, D5 and D6 in paragraphs 13.7.25 to 13.7.40 and 13.7.52 to 13.7.75 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. LVIA Viewpoints 4.05: PRoW near Hillhouse Wood, west of West Bergholt (West Bergholt 5), 4.14: Fordham Road, north-east of Fordham, 4.28: Essex Way near Poole's Farm and 4.38: Essex Way, West Bergholt are located within West Bergholt Parish. Effects on landscape receptors within the parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Great Horkesley Farmland Plateau Landscape Character Area (LCA) (paragraphs 13.3.528 to 13.3.542), Rochfords Farmland Plateau LCA (paragraphs 13.3.513 to

⁸³ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

Topic	Comment	National Grid's response
		13.3.527), Colne River Valley Slopes LCA (paragraphs 13.3.543 to 13.3.558) and Colne River Valley Floor LCA (paragraphs 13.3.559 to 13.3.572). Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.
Cost	3. The cost of the proposed piecemeal approach to the Scheme involving the structure of a network of pylons is estimated to be some £7 billion, whereas the structure of an offshore grid is estimated to be some £5 billion. This cost overreach cannot be justified on any grounds whatsoever especially in view of the parlous state of the Nation's finances.	The estimated costs for each strategic option considered by the Applicant are set out in 7.17 Strategic Options Backcheck and Review [APP-355]. This assessment reflects updated cost and technology information, together with changes in the planning and regulatory framework. Where the costs of more minor elements are unlikely to be differentiating between strategic options, these have not necessarily been included. Throughout the development of the Project, the Applicant has engaged proactively with government and regulators on policy and cost considerations associated with new infrastructure. The Applicant continues to monitor technological developments, actively exploring innovations and alternative technology types, which are assessed for their suitability and applicability to the Project. A range of alternative technologies has been investigated and is documented within 7.17 Strategic Options Backcheck and Review [APP-355]. These include an offshore connection using Direct Current (DC) technology, as well as a range of onshore connection options. The onshore alternatives considered comprise increasing operational voltages on the existing network above 400 kV; Alternating Current (AC) overhead lines (an established technology); alternative pylon designs; AC underground cables; High Voltage Direct Current (HVDC) overhead lines and underground cables; and Gas Insulated Line technology. HM Treasury's The Green Book⁸⁴ provides guidance on the appraisal of public policies, programmes and projects to ensure effective use of public funds. It is not a requirement of the Planning Act 2008, and there is no obligation for an application for development

⁸⁴ HM Treasury (2026) *The Green Book – UK Government Guidance on Appraisal*

Topic	Comment	National Grid's response
		consent to include a Green Book assessment. Its use in the context of development consents is limited to public projects such as highways. That said, while not mandated, Green Book principles inform the wider regulatory and appraisal framework, including the processes overseen by Ofgem, and therefore influence how DCO applications are developed and justified. The Applicant's appraisal approach is aligned with Ofgem's funding and regulatory requirements and demonstrates compliance with the economic, social and environmental objectives set out in the National Policy Statements. Throughout Project development, core appraisal principles are applied to ensure decisions deliver value for money, efficiency and proportionate outcomes. The Applicant is confident that its assessment and decision-making process is robust, proportionate and appropriate. This approach has been consistently tested and endorsed through previous projects, formal examination, and ultimately decisions taken by the relevant Secretary of State. A full, transparent and auditable cost model underpins the options appraisal, clearly setting out how costs have been assessed and compared across alternatives. This is available in Appendix D Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355], which sets out in transparent detail how options appraisal costs were evaluated.
Alternatives	4. In view of all (but not exclusively) the foregoing, The Council supports the following two alternatives to the proposed Scheme: a. A fully integrated offshore grid or b. The installation of High Voltage Direct Current (HVDC) cables from Norwich to Tilbury either underground or sub-sea.	Alternatives have been fully considered throughout Project development. The Project has been designed in line with NPS EN-5 (2024), which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure. This strong starting presumption remains even when there is a high likelihood of significant impact and is only reversed for nationally designated landscapes. Except in nationally designated landscapes, underground or offshore alternatives are only preferred when their benefits outweigh any extra economic, social, or environmental impacts. The Applicant has rigorously tested all realistic alternatives to assess those impacts, including onshore AC cable, AC gas-insulated line, HVDC options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socio-economic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore

Topic	Comment	National Grid's response
		HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity. An offshore solution capable of matching the capacity of the proposed overhead line would require three subsea cables and substantial additional onshore infrastructure. As set out in the 2024 Strategic Options Backcheck and Review (Appendix B of 7.17 Strategic Options Backcheck and Review [APP-355]), the total capital cost of the overhead line options (EAN 4 and EAS 2) is in the region of £895m, compared with £4,096.5m for the HVDC Offshore 1 option (2020/21 prices). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. EN-5 (2024) also accepts that undergrounding and offshore technologies have significantly higher lifetime costs of repair and later uprating. HVDC options are also constrained by fundamental technical limitations, including the absence of commercially available HVDC circuit breakers. Without them, highly interconnected HVDC networks cannot safely accommodate power infeed above 1,800 MW under Security and Quality of Supply Standards, as a single fault would shut down the entire system. Loss of more than 1,800 MW on the National Electricity Transmission System would cause a major frequency deviation, risking a national system outage. This currently limits both the scale and interconnectivity of HVDC solutions. Other bodies are also in agreement that the shape of our proposals is reasonable and aligns with these requirements. Ofgem has authorised investment which has allowed us to progress the Project; and the Project in its current form has also been given 'proceed' signals by NESO. Given the level and urgency of need for new energy infrastructure, NPS EN-1 (2024) states that consideration of alternatives must be proportionate, and that only alternatives that can meet the objectives of the proposed development need to be considered. These objectives include security and affordability. Policy also requires consideration of whether it is realistic that alternatives could deliver the same infrastructure capacity (and address energy security, climate change and other environmental benefits) in the same timescale as our proposals. Furthermore, a delay to the Project would result in additional cost to the consumer. Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to

Topic	Comment	National Grid's response
		additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. Accordingly, and in line with EN-1 (2024) and EN-5 (2024), we have applied the starting presumption in favour of overhead lines where appropriate, reversed that presumption within designated National Landscapes, and included targeted undergrounding where justified. The Applicant pursuing an offshore or HVDC alternative for this Project would be contrary to the strong presumptions set out in policy and would not allow us to meet the project objectives.
N/A	The Council trusts that the Inspector will give full consideration to the contents of this letter and to our previous fully detailed submission. Yours Faithfully West Bergholt Parish Council	Noted.

2.61 White Notley and Faulkbourne

2.61.1 Table 2.61 below outlines the Applicant's comments on the Relevant Representation (RR) provided by White Notley and Faulkbourne Parish Council **[RR-3811]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.61 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	White Notley & Faulkbourne Parish Council object to National Grids proposal for the following reasons:	The Applicant notes the Parish Council's feedback and has provided its response to White Notley and Faulkbourne Parish Council's specific points below.
Landscape and Visual	The proposed pylons will be 50m high and visible from the village(s) of Faulkbourne & White Notley	The Applicant has sought to reduce, as far as practicable, potential impacts on visual receptors, through routeing and siting. The Applicant notes the concern of White Notley and Faulkbourne Parish Council regarding the proposed pylons of the Project, specifically related to views from the villages of Faulkbourne and White Notley. The Applicant confirms the Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁸⁵. Effects on visual receptors within White Notley and Faulkbourne parish are set out under Visual Receptor Area (VRA) E4 (paragraphs 13.8.35 to 13.8.46), VRA E5 (paragraphs 13.8.47 to 13.8.58) and VRA E6 (paragraphs 13.8.59 to 13.8.70) in Section 13.8 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant visual effects are identified within approximately 1.5 km of the Project, including views from the north and east of White Notley and from Faulkbourne.

⁸⁵ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition*

Topic	Comment	National Grid's response
		Views from the edge of White Notley are represented by Viewpoint 5.04 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231] , pdf page 128. Views from the edge of Faulkbourne are represented by Viewpoint 5.12 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232] pdf page 19. The visual effect of the Project from these viewpoints is assessed as significant, as the Project would be visible in open views and appearing elevated in the landscape as it crosses the Brain Valley. Viewpoints 5.04 and 5.12 are approximately 0.63 km and 0.6 km from the nearest above ground structure of the Project, respectively.
Socio-economics Recreation and Tourism	They will be Less than 1km from White Notley school	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations of education establishments. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on education facilities as a result of the Project. No significant adverse effects have been identified for education establishments located within White Notley and Faulkbourne Parish Council. Given that White Notley Church of England Primary School does not fall within the Local Study Area (i.e., Order Limits), no land take or direct access disruption is anticipated, and has been scoped out of the Socio-economics, Recreation and Tourism Environmental Statement (ES) assessment. As part of the assessment, a range of measures are considered during the construction phase to reduce, where practicable, disruption to education establishments. These include traffic management, signage and routeing measures to ensure access or partial access can be maintained where feasible. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.2 Outline Code of Construction Practice (Revision C). The assessment concludes that there would be no significant effects on education facilities within the study area as a result of the construction and operation of the Project.
Biodiversity, ecology and	[The proposed pylons will...] Destroy environment, wildlife, farmland, trees and views.	The Applicant has sought to reduce, as far as practicable, impacts on the environment, wildlife, farmland, trees and views around White Notley and Faulkbourne through careful routeing and siting. The Applicant has undertaken an Environmental Impact Assessment

Topic	Comment	National Grid's response
nature conservation Land use (to include agriculture, use of best and most versatile land, soils, green belt and green infrastructure) Landscape and Visual		(EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (Volume 6: Environmental Statement [APP-123 to APP-287]) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential effects. The impacts on wildlife and habitats are assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) contain a list of relevant good practice measures to avoid or mitigate potential impacts on habitats and protected species. On completion of works, all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting has been proposed within Environmental Areas surrounding the Applicant's permanent assets. Illustrative landscape designs for these areas have been provided within 7.4 Outline Landscape and Ecological Management Plan (Revision D). In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10% greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Full details are presented within 7.1 Biodiversity Net Gain Report [APP-299]. The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within White Notley and Faulkbourne Parish (predominantly Grade 3a with a small extent of Grade 3b land). The Applicant has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is

Topic	Comment	National Grid's response
		necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. As noted earlier in this table, the LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] recognises that there will be significant visual effects of the Project during its construction and operation (and maintenance) within White Notley and Faulkbourne parish. The earlier response in this table (see first Landscape and Visual row) also provides information on visual effects within the Parish). Effects on landscape receptors within White Notley and Faulkbourne parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Area (LCA) B1 Central Essex Farmland in paragraphs 13.3.654 to 13.3.678 and LCA C6 Blackwater and Brain Valley in paragraphs 13.3.679 to 13.3.698. Significant effects are identified within approximately 1.5 km of the Project. The impacts on farmland, trees and views are considered within these landscape and visual assessments. Arable fields are noted as a key characteristic of these LCAs. At construction it is assessed that <i>‘there would be disturbance to farmland (mainly arable) and semi-natural habitat, and the loss of some field boundary hedgerows, hedgerow trees, field trees, and riparian vegetation.’</i> At operation it is stated that <i>‘hedgerows would be replaced across the LCA’</i>. The rural farmland landscape will remain in place beneath and around the proposed overhead line. The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] is based on an assumed worse case tree and hedgerow removal as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 162 to 190 and 193 to 195 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment: LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries.

Topic	Comment	National Grid's response
		The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement (NPS) EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant landscape and visual effects will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
Health and Wellbeing	[The proposed pylons will...] Increase risk of Electro Magnetic Fields (EMF) and associated illnesses.	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing electric and magnetic fields (EMFs), which are incorporated into the decision-making process for development consent in National Policy Statement (NPS) EN-5. These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) which carefully reviews all science concerning EMFs and health. After decades of research into EMFs and health there are no established health effects below the exposure limits. We believe important decisions on health should be made independently of industry, and all the proposed assets comply with the policies and measures set by government, based on the advice of their independent advisors UK Health Security Agency. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in 7.8 Electric and Magnetic Field Compliance Report [APP-330].
Socio-economics Recreation and Tourism	[The proposed pylons will...] Takeover peoples land during construction, including pitches at the football club (meaning they will have to close!) & in some cases, peoples gardens!	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of sports clubs, including White Notley Football Club, in Table 15.22 (Potential residual construction effect on built and other assets) and in Table 15.28 (Residual operation (and maintenance) effect on built and other assets). Access to the football club and football pitch would be maintained with a period of disruption to the western football pitch as set out in 6.15 Environmental Statement

Topic	Comment	National Grid's response
		Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The assessment also set out that separate discussion with the landowner would be undertaken prior to and during construction to manage access and minimise disruption during the overhead line stringing work. Given the rolling nature of the linear works, the construction activities in any particular area are likely to be short term, with no significant adverse effects anticipated during construction. No physical works are proposed for the permanent acquisition of rights of access in sections of the football pitches, with no significant adverse effects during operation anticipated. Engagement with Sports England and White Notley Football Club has been undertaken since April 2025 to clarify the potential impact on the club.
Transport and Traffic	[The proposed pylons will...] Cause chaos on local roads: HGV's heavy machinery & traffic systems plus new access roads across farmland.	The Applicant proposes the construction routeing strategy in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The construction vehicle routeing strategy has been designed to minimise impacts across the highway network. Construction traffic will use the Strategic and Major Road Networks to access the region, onto prescribed Primary Access Routes (PARs) to reach the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. There is one PAR within Faulkbourne which is a short section of Church Hill (PAR 43) to access TB-B076 and TB-B077 as illustrated in Figure 1 Page 22 of 30 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]. The Applicant is proposing an increase of 17 HGV movements in the AM and PM peak hours along Church Hill during the worst-case peak construction activity over a period of one week. Outside of this peak construction period, the construction flows will be lower as shown in Image E.43 on 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. The Applicant has completed junction modelling on those junctions identified as sensitive, based on existing congestion or potential capacity issues due to the increase in traffic, in 7.11 Transport Assessment [APP-333]. There are no sensitive junctions identified in Faulkbourne Parish. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse riding on amenity, severance and fear and intimidation along the PARs located on the Local Road Network. The

Topic	Comment	National Grid's response
		Applicant's assessment in 6.16.4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] details an increase in total traffic of 5% during the worst-case peak construction period with a duration of one week on Church Hill (PAR 43). Image A16.4.43 indicates the construction flow on Church Hill (PAR 43) throughout the construction programme. No significant residual effects were identified for driver / public transport passenger delay, severance and fear and intimidation. The residual effect on amenity was identified as large and significant as presented within Table A16.4.8. The Applicant has therefore identified the following potential mitigations along Church Hill (PAR 43) to minimise this impact: • Updating the driver management pack to reflect that pedestrians may be in the highway, walking either on verge or carriageway • Ensuring adjacent vegetation is maintained to keep the verge clear and allow full width to be utilised • Use warning signage to warn drivers of upcoming pedestrians crossing the carriageway. Details of the proposed mitigation are set out within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B).
Transport and Traffic		7.2 Outline Code of Construction Practice (Revision C) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes. The principles for siting and designing access routes are set out in 7.2 Outline Code of Construction Practice (Revision C) Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in 7.2 Outline Code of Construction Practice (Revision C) Section 6 (Agriculture and Soils); and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition

Topic	Comment	National Grid's response
		surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in Section 6 (Hydrology, Land Drainage and Flood Risk) of 7.2 Outline Code of Construction Practice (Revision C) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through Section 6 (Socio-economics, Recreation and Tourism) of 7.2 Outline Code of Construction Practice (Revision C) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through 7.3 Outline Construction Traffic Management Plan (Revision B), with commitments T01–T07, AQ01 and NV07 addressing routeing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice (Revision C) are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (Revision C).
Socio-economics Recreation and Tourism	[The proposed pylons will...] Delay residents daily commute, school runs, hospital appointments etc.	The Applicant is a responsible developer which always has the communities it serves in mind. Therefore, we will seek to engage and work with the community to minimise disruption. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] considers how the Project might potentially impact community facilities and identifies potential mitigation measures where appropriate to reduce negative impacts. No significant adverse effects have been identified for community facilities located within White Notley and Faulkbourne Parish Council.

Topic	Comment	National Grid's response
		Similarly, 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required). Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance⁸⁶. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Health and Wellbeing	[The proposed pylons will...] Have a negative impact on Mental Health & wellbeing	Potential impacts of the Project on mental health and wellbeing are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. In respect to mental wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison

⁸⁶ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
		officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated.

2.62 Wickham Skeith Parish Council

- 2.62.1 Table 2.62 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Wickham Skeith Parish Council **[RR-3814]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.62 Comments and National Grid's response

Topic	Comment	National Grid's response
Transport and Traffic	The Parish Council OBJECTS to the plan. The concerns include access for construction vehicles and maintenance of the site over the next 40 years.	The Applicant is proposing a construction routeing access strategy, detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The proposed strategy routes construction vehicles along Primary Access Routes (PARs) to site access points from the strategic and major route networks. There are no proposed PARs in Wickham Skeith Parish. The closest PAR is to the west on Wickham Road and Eastlands Lane (PAR 13 and PAR 14) as shown on Figure 1 page 10 of 30 in 7.11 Transport Assessment - Appendix I – Figures [APP-342]. As detailed within 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the Applicant is proposing an additional 26 HGV movements on Wickham Road (PAR 13) in the AM and PM Peak hour with worst-case peak construction activity over a duration of two weeks. For Eastlands Lane (PAR 14) there would be an additional 13 HGV movements over a duration of 22 weeks. The Applicant has assessed the significance of residual construction effects in Section 16.7 in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] on Wickham Road (PAR 13) and Eastlands Lane (PAR 14). It was found that there would be no significant effects as a result of the Project as detailed in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. As noted in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], operational and maintenance activity would require a limited workforce. During operation (and maintenance), the Applicant would require infrequent access to ensure the operational Project is appropriately surveyed, assessed, and maintained. Access would typically be made by foot, 4x4 or tractor and trailer.

Topic	Comment	National Grid's response
Noise and Vibration	The hours of work, noise and disruption during and after construction.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: - Monday – Friday: 07:00 to 19:00 - Saturday, Sunday and bank holidays/public holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C). The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The construction working hours set out in 3.1 Draft Development Consent Order (Revision C) define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in 7.2 Outline Code of Construction Practice (Revision C). The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in

Topic	Comment	National Grid's response
		longer term exposure to construction impacts. A blanket prohibition on Sundays/bank holidays would materially harm the deliverability of this critical national priority project. The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters; this includes the core working hours for the construction phase of the Project. 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order (Revision C) within the final Code of Construction Practice.
Land use	Wickham Skeith Parish Council and the residents of Wickham Skeith OBJECT to the proposal for nine of 50m pylons planned on prime agricultural land across the Parish	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Wickham Skeith Parish (a mix of Grade 2 and Grade 3a, with limited extents of Grade 3b land). The Applicant has sought to minimise impacts on BMV agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. The Applicant has taken into consideration the location of existing and proposed land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from

Topic	Comment	National Grid's response
		the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127], potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner.
Health and wellbeing	with serious concerns the impact these will undoubtedly have on residents quality of life both at development and post development stage.	The Applicant is a responsible developer who has sought to engage with local communities such as Wickham Skeith, to understand potential issues and concerns as they relate to the construction, operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors, such as residential properties, as far as reasonably practicable. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health and wellbeing, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. In respect to impacts on health and wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners.

Topic	Comment	National Grid's response
		Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated. The Applicant is preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance⁸⁷. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly

⁸⁷ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic	Comment	National Grid's response
		and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
Consultation	Following many public meetings, the most recent being on 22 November 2025, these concerns were raised again. The residents of Wickham Skeith would like confirmation of the legality of National Grid's consultation process in relation to its Development Consent Order (DCO) application with concerns the consultation has not complied with the requirements set out in Rules 2,3 & 4 of the Gunning Principles.	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007] .
Landscape and Visual	Whilst residents accept the need to find ways of bringing green energy in from the North Sea, these pylons are proposed on prime agricultural land in an area of natural, unspoilt, rural landscape	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within Wickham Skeith Parish (a mix of Grade 2 and Grade 3a, with limited extents of Grade 3b land). The Applicant has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routeing and siting process confirms that no reasonable alternatives are available. The Applicant has undertaken a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Impact Assessment for the Project and set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].

Topic	Comment	National Grid's response
		Mitigation measures relevant to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Effects on landscape receptors in Wickham Skeith Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under LCT Plateau Claylands (paragraphs 13.3.242 to 13.3.256) and Rolling Valley Claylands (paragraphs 13.3.213 to 13.3.226). The Plateau Claylands are described as a <i>'working landscape on which suburbanisation is only beginning to make an impact compared with other parts of the county'</i> and the key characteristics also note <i>'extensive areas of hedgerow loss creating 'arable prairies'.</i> An existing 400 kV overhead line runs from north to south in the east of the Parish. Significant adverse landscape effects are reported within approximately 1.5 km of the Project within the Plateau Claylands, and within approximately 0.5 km in the Rolling Valley Claylands. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant landscape and visual effects will occur.
Landscape and Visual	The Holford Rules, especially rules 2, 4 and 5 must be applied in considering the visual impact these pylons would have on the rural landscape.	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.

Topic	Comment	National Grid's response
		The Applicant has undertaken a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Impact Assessment for the Project and set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Mitigation measures relevant to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The visual effects within Wickham Skeith parish are set out under Visual Receptor Areas (VRAs) B4 Finningham and Gislingham and VRA B5 Wickham Skeith and Mendlesham in paragraphs 13.5.37 to 13.5.60 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant adverse visual effects are identified within 1.5 km of the Project within Wickham Skeith parish. Viewpoint assessment findings also identify significant and adverse visual effects. This includes views within Wickham Skeith parish looking to the Project to the west as represented by: • Viewpoint 2.08 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] pdf page 509. • Viewpoint 2.23 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] pdf page 2. Viewpoints 2.08 and 2.23 are approximately 0.73 km and 0.03 km from the nearest above ground structure of the Project, respectively. Viewpoint 2.50 is approximately 2.50 km from the nearest above ground structure of the Project. Effects on this view are reported as not significant within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] pdf page 76. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of National Policy Statement EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. It is recognised by the Applicant that significant landscape and visual effects will occur.
Historic Environment	The enormous adverse impact these pylons will place on the entire Parish, including the	Through routeing and siting, the Applicant has sought to reduce as far as is practicable, potential impacts on the historic environment in Wickham Skeith Parish. The impacts of the Project on the Parish's historic environment are assessed in 6.11 Environmental

Topic	Comment	National Grid's response
	seven listed buildings and their surroundings to the West of Wickham Skeith all of whom will be within the shadow of the pylons, is a material planning consideration.	Statement Chapter 11 - Historic Environment [AS-068], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Wickham Skeith Parish. The Project will not result in any substantial harm to designated heritage assets. In addition to the proposals in 7.4 Outline Landscape and Ecological Management Plan (Revision D), 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. The Applicant has reviewed the assessment of the listed buildings to the west of Wickham Skeith considering the Parish Council's comments. The Applicant is confident that the results of the assessment for Wickham Skeith Parish presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are both proportionate and appropriate. 5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025.

Topic	Comment	National Grid's response
		5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.
Transport and Traffic	The Parish Council cannot be expected to make comment on the road network as there is no clarity on how these plyons will be delivered. In order to make an informed comment we would need clear information on what roads are used for what purpose and the timings i.e HGV frequency and size, duration of the proposed works, how many areas will be concrete standing areas (where will they be), will large cranes often be going through the village, what will the traffic look like post development. Currently these roads, many of which are single-track lanes with no industrial road capacity, are already 'dissolving' into ditches and leaks appearing.	The Applicant is proposing a construction routeing access strategy, detailed in Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). Construction traffic will use the Strategic Route Network (SRN) and Major Route Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes (PARs) to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. There are no proposed PARs in Wickham Skeith Parish. The closest PAR is to the west on Wickham Road and Eastlands Lane (Link PAR 13 and 14). The Applicant is proposing to route a peak of 26 HGVs on Wickham Road in the AM and PM Peak hour, and 13 HGVs on Eastlands Lane (noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Developments Impacts [APP-338]). 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] Image A16.4.13 indicates the daily trip distribution on Wickham Road (Link PAR 13). Image A16.4.14 displays the same information for Eastlands Lane (Link PAR 14). Construction activities which can include concrete are detailed in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], among them, concrete batching plants. There are no proposed concrete batching plants in Wickham Skeith. The Applicant has developed 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310], which outlines the construction access strategy for the delivery of Abnormal Indivisible Loads (AILs), including large mobile cranes. These broadly follow the PARs but have nuanced routeing where required. There is no proposal to route these AIL movements through Wickham Skeith. As noted in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], operational and maintenance activity would require a limited workforce. During operation

Topic	Comment	National Grid's response
		(and maintenance), the Applicant would require infrequent access to ensure the operational Project is appropriately surveyed, assessed, and maintained. Access would typically be made by foot, 4x4 or tractor and trailer.

2.63 Winfarthing Parish Council

- 2.63.1 Table 2.63 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Winfarthing Parish Council [RR-3854]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.63 Comments and National Grid's response

Topic	Comment	National Grid's response
Landscape and Visual	As a Parish Council we are opposed to the overground electricity pylons proposed to cut through the heart of our rural community, that will leave a permanent and unsightly scar in an area of beautiful countryside that many people have moved to the village for.	The Applicant notes the concerns raised. The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Effects on visual receptors within Winfarthing Parish Council are set out under Visual Receptor Areas (VRAs) A7 Goose Green, A8 Tibenham, A9 Shelfanger and A10 Burston in paragraphs 13.4.72 to 13.4.119 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. LVIA Viewpoint 1.12: Heywood Road, south of Winfarthing is located within Winfarthing Parish. Effects on landscape receptors within Winfarthing Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under the Waveney Tributary Farmland Landscape Character Area (LCA) in paragraphs 13.3.126 to 13.3.140 and Great Moulton Plateau Farmland LCA in paragraphs 13.3.97 to 13.3.110. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.
Alternatives	We have canvassed the opinion of our community before submitting this feedback. Over seventy people attended a	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the

Topic	Comment	National Grid's response
	meeting at Winfarthing Village Hall on the 6th June 2022 to discuss the proposed above ground route for electricity. Without exception everyone present was opposed to the current plan, which was presented as a pre-selected route rather than options to be considered. Our community is concerned by these plans on multiple fronts.	selection of the preferred option. The alignment of the overhead line has been developed following an extensive, multistage routeing and siting process, informed by environmental assessment, engineering constraints, land use considerations and consultation feedback. The Applicant has carried out multiple rounds of consultation since 2022, considering feedback and refining our proposals at each stage. Throughout, our approach to consultation has fully complied with both statutory requirements and the statutory guidance on consultation relevant to applications for development consent (which has been developed by government and the Planning Inspectorate in accordance with the Gunning Principles. All feedback received at each stage of consultation has been considered by the Project team and, where appropriate, we have amended our proposals in response. The outcomes and reasons for either making or not making changes are set out in various documents. Individual responses set out in 5.1 Consultation Report [APP-066] with more overarching changes in the various Design Development Reports (the most recent being 5.15 Design Development Report [APP-122] with earlier requests covered in APP-358 to APP-360).
Historic Environment	Winfarthing is a traditional linear village with a large conservation area along the majority of the main road, which restricts development to maintain the villages traditional feel. The village contains 35 grade 2 listed buildings and a grade 1 listed church.	The Applicant acknowledges that the settings of some designated assets within Winfarthing Parish fall partially within the Order Limits. The Applicant has reviewed the assessment of Winfarthing's conservation area and listed buildings considering the Parish Council's comments. The impacts of the Project on Winfarthing's historic environment are assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] , 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The Applicant is confident that the conclusions reached on the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are both proportionate and appropriate. The Project would lead to no harm or less than substantial harm on Winfarthing Conservation Area and its listed buildings.

Topic	Comment	National Grid's response
		Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders including local authorities and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.
Landscape and Visual	The proposed route runs approximately 400 metres from the conservation area and would be visible from every house in the village.	Visual effects on residents within Winfarthing village are set out under VRA A9 Shelfanger in paragraphs 13.4.96 to 13.4.107 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. From Winfarthing, vegetation along the eastern settlement boundary would filter views towards the Project, however the visual effect would be moderate and significant (adverse). This is represented by Viewpoint 1.12: Heywood Road, south of Winfarthing, set on pages 460 to 462 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The visual effect at this viewpoint is reported as moderate-major and significant (adverse). Regarding the historic environment, the Applicant has reviewed the assessment of Winfarthing's conservation area and listed buildings considering the Parish Council's comments, and the Applicant's response is presented above.

Topic	Comment	National Grid's response
Planning policy	The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). The impact of the Project was assessed in accordance with 6.19 Scoping Report [APP-288 – APP-296] , 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and in accordance with professional heritage sector guidance as set out in paragraph 11.2.19. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including baseline data sources, methodology for assessment and appropriate mitigation measures and has taken their views into account during Project development. These are detailed in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] and in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground, 5.9.1-5.9.12 and 5.9.14 [APP-088 to APP-100 and APP-102]).
Planning policy	Under section 72 of the same Act, it is a duty with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. The proposals for the Pylons is in direct contradiction to this Act.	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets, it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs

Topic	Comment	National Grid's response
		4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Historic Environment	Within the village there is a live archaeological dig which has found Anglo Saxon jewellery (the Winfarthing Pendant) which has been described as of significant cultural importance. The find was declared Treasure by the UK government and has been valued at £145,050. In addition, the pendant was voted the nation's favourite acquisition of the year from a shortlist of 10 works of art and objects that Art Fund helped UK museums to buy in 2018. A measure of the pendant's beauty and archaeological importance is that it has been on display in the British Library's major exhibition Anglo-Saxon Kingdoms.	Through routeing and siting, the Applicant has sought to reduce as far as practicable, potential impacts on the archaeological resource within Winfarthing Parish. A comprehensive desk-based assessment and walkover have been undertaken (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]), along with archaeological evaluation (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 to AS-076] , 6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078] , and 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). This has identified archaeological sites, both scheduled and non-designated, along the proposed route. Where sites of archaeological significance were identified, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant will ensure that any residual impacts are minimised and that appropriate mitigation measures are in place.
Land and Property	The maximum height of the trees in the areas is around 25 – 30m, with a very flat topology. The pylons at 50m would be twice the height of the trees, meaning that they would be	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include compensation in cases of a loss of view or changes to a view.

Topic	Comment	National Grid's response
	visible across the flat landscape from all properties in the village, significantly impacting house prices in the area and likely limiting their desirability.	Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
Socio-Economics, Recreation and Tourism	The proposed route approximately 500 metres from of the village school, which already has low uptake. The visibility of huge pylons from the playground will discourage parents from sending their children to the school; rightly or wrongly people associate pylons with risk to health and in turn will cause irreparable and potentially critical damage to the school which is crucial to the community.	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations of education establishments. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on community facilities, including education establishments. No significant adverse effects have been identified for schools located within Winfarthing Parish Council. In relation to perceptions about health risk from electric and magnetic fields (EMFs), 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] has identified opportunities for public awareness raising about EMFs, which will form part of measures recommended for affected communities along the proposed route.
Health and Wellbeing	Some members of our community are already suffering mental health problems as a result of these heavy-handed proposals. Many have moved to the village for the tranquillity and peaceful rural life that will be destroyed by this huge engineering project, followed by devastating eyesores visible from their once idyllic homes.	The Applicant is a responsible developer that has sought to engage with local communities such as Winfarthing, to understand potential issues and concerns as they relate to the construction, operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors such as residential properties, as far as reasonably practicable. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the impact of the Project on both physical and mental health and wellbeing, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. In respect to impacts on mental health and wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept

Topic	Comment	National Grid's response
		informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and where, therefore, effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated.
Needs Case	This proposal gives nothing to the area, or community in East Anglia as a whole. The	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the electricity that will be generated and connected to the electricity transmission network

Topic	Comment	National Grid's response
	wellbeing and livelihoods of Norfolk, Suffolk and Essex residents is being put behind the needs of London residents and their power requirements. National Grid's own website states that Electricity use in East Anglia has dropped since 2019, yet we are getting penalised in the short and long term.	by 2030, while working to the required standards. The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, whilst also introducing system resilience to provide crucial energy security for the East of England as a whole, including local communities. The Project would enable the connection of new sources of renewable energy and contribute to our energy security in the future, helping the country to achieve the government's Net Zero target and ensuring that the Applicant meets future power demands.
Alternatives	We understand the need for the power being generated not only by the offshore farms but also the new Sizewell power station being built, but we believe that the offshore undersea cable route proposed by Sir Bernard Jenkins MP and the Off-Shore Electricity Grid Task Force (OffSET) is the best option for this need to get the power from the north sea and Suffolk coast to Tillbury.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines (which form the basis of the Project) with change where justified by consideration of the mitigation hierarchy. 5.15 Design Development Report [APP-122] paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons, are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Cost	National Grid have confirmed in the long term this approach could save £6bn, however have a higher initial outlay. Our belief is that the wellbeing of the residents, wildlife and countryside of not only	The Applicant notes the respondent's feedback. Cost is one of many factors that was considered in making decisions on the Project as guided by the Applicant's duties under the Electricity Act 1989. NPS EN-5 (2024) makes it clear that the government considers overhead lines to be appropriate and acceptable in most instances. However, the government is aware that overhead lines may not be appropriate in particularly sensitive areas. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting⁸⁸). Its aim is to ensure that decisions regarding

⁸⁸ National Grid (2022) *Our Approach to Consulting*

Topic	Comment	National Grid's response
	Winfarthing but along all areas of this 180Km route is worth significantly more than the saving gained in the short term by putting these monstrous eye sores across our land.	the Project's design (route, location, or technology option) are based on a full understanding and balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed; with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. The consideration of cost within the decision-making process is therefore one of our statutory duties and is not something that we could make representation to the Office of Gas and Electricity Markets (Ofgem) to waive.
Alternatives	If a decision was made that the undersea route was not feasible we would reluctantly support an underground route along the proposed route, however this would not address concerns 2, 5 and 6 above.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. 5.15 Design Development Report [APP-122] paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons, are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

2.64 Wortham and Burgate Parish Council

2.64.1 Table 2.64 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Wortham and Burgate Parish Council **[RR-3856]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.64 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	Objection to the Scheme: Wortham & Burgate Parish Council strongly objects to National Grid's current proposal for 184km of 50m overhead pylons, to transport power from Norwich to Tilbury. Whilst the Parish Council acknowledges the government's net zero commitment, and is mindful of related energy security, carbon reduction and energy poverty issues, it recognises the findings of the Hiorns report, in that the need for additional transmission capacity is more likely to be closer to 2034/2035 than National Grid's programme delivery date of 2030.	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks ⁸⁹ and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO report Clean Power 2030, Annex 2: Networks, connections and network access analysis, ⁹⁰ Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers, of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.
Alternatives	The Parish council believes that a pause to the scheme is	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out

⁸⁹ Andy Hiorns (2023) *East Anglia Transmission Network Reinforcements*

⁹⁰ National Energy System Operator (2024) *Clean Power 2030, Annex 2: Networks, connections and network access analysis*

Topic	Comment	National Grid's response
	necessary to allow preferable alternatives such as a fully integrated off shore grid, or HVDC underground cables, to be considered and consulted upon.	the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines, which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. 5.15 Design Development Report [APP-122] paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. The Applicant also notes constraints in the high voltage direct current (HVDC) market, which are likely to make an HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another current technical limitation. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards (NETS SQSS), which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service.
Needs Case	This delay would be more likely to enable delivery of the objectives of this and other projects in the region, whilst minimizing the impacts on the local communities and environment.	National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The National Energy System Operator (NESO) is an independent body responsible for planning the GB energy system and for providing advice and guidance to decision-makers and applicants. It identifies the Norwich to Tilbury Project as two of the three energy projects critical to delivering a network which supports clean power pathways. This is in the context of electricity demand, which is going to double, including in East Anglia, by 2050. NESO also identifies that support is necessary for our proposal, if possible, to bring

Topic	Comment	National Grid's response
		the Project forward to 2030 as opposed to 2031. In any event, delay would create substantial constraint costs and impacts on zero delivery.
Landscape and Visual Biodiversity, ecology and nature conservation Historic Environment	Visual Impact & Heritage:- Wortham Ling SSSI adjoins the River Waveney in the south, with several rural lanes, and the Angles Way footpath along its southern boundary. It is the largest lowland heath in the area and an exceptionally beautiful wild common, which is popular with many visitors from nearby villages as well as further afield, who value its unspoilt beauty. Wortham Ling as it is today, represents how many Suffolk villages once looked and is therefore an important asset not just for its natural interest, but also as a visual historical record.	The Applicant notes the concerns of Wortham and Burgate Parish Councils. The landscape assessment in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] notes the contribution that Wortham Ling makes to landscape value in the Rolling Valley Farmlands and Furze Landscape Character Type (LCT) (Table A9 of Annex A). Effects on landscape receptors within Wortham and Burgate Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under the Waveney Rural River Valley LCA in paragraphs 13.3.155 to 13.3.169, Rolling Valley Farmlands and Furze LCT in paragraphs 13.3.183 to 13.3.196, and Ancient Plateau Claylands LCT in paragraphs 13.3.227 to 13.3.240. Significant effects are identified within approximately 1.5 km of the Project, including from parts of Wortham Ling. Effects on visual receptors within Wortham and Burgate Parish are set out under Visual Receptor Area (VRA) B1 in paragraphs 13.5.1 to 13.5.12 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Significant effects are identified within approximately 1.5 km of the Project, including from parts of Wortham Ling. Viewpoint 2.01: Ling Road, Wortham Ling represents views from Wortham Ling, as set out on pages 490 to 493 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Effects are judged to be moderate-major and significant (adverse). An assessment of sequential effects on the Angles Way long distance route is provided in paragraphs 13.12.15 to 13.12.29 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Significant adverse effects are identified. Wortham Ling SSSI has been included and assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No impact pathways have been identified that would have a significant residual effect on Wortham Ling SSSI, following the implementation of mitigation measures detailed in 7.2 Outline Code of

Topic	Comment	National Grid's response
		Construction Practice (Revision C), and 7.4 Outline Landscape and Ecological Management Plan (Revision D). With regard to the historic environment, Wortham Ling is not identified as a heritage asset within the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Wortham Ling is, however, recognised by the Suffolk Historic Environment Record (HER) as the location of a widespread scatter of worked flint (including terminal Palaeolithic and Mesolithic material), early Iron Age pottery, beaker pottery, and occasional Roman and medieval sherds. The dispersed and ill-defined settlement of Wortham Ling is also not identified as a heritage asset in the agreed sources noted above; there are, however, several listed buildings in the area. The Applicant has therefore reviewed the assessment of Wortham Ling and the adjacent listed buildings considering the Parish Council's comments. The impacts of the Project on Wortham and Burgate historic environment are assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Applicant is confident that the conclusions reached on the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are both proportionate and appropriate. The Project would lead to no harm or less than substantial harm on Wortham Ling and adjacent listed buildings.
Landscape and Visual	Long Green Wortham is a designated Visually Important Open space. In the Mid Suffolk Local Plan, VIOSs are protected to maintain the visual character of the area. The visual impact of	Effects on visual receptors within Wortham and Burgate Parish are set out under Visual Receptor Area (VRA) B1 in paragraphs 13.5.1 to 13.5.12 of 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229] . Significant effects are identified within approximately 1.5 km of the Project, which includes the eastern fringes of Wortham (paragraph 13.5.8). The majority of the settlement of

Topic	Comment	National Grid's response
	Pylons RG092 to RG100 will eliminate this protected VIOS.	Wortham is over 1.5 km from the Project, and effects are identified as minor and not significant (adverse). Viewpoint 2.32: PRoW north of Wortham is located to the north of Wortham and effects are identified as negligible and not significant (adverse) as set out in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 2 of 4 [APP-230]. The assessment notes that during operation <i>‘the Project would be screened by mature woodland in long distance views to the south-east’</i> while to the north-east <i>‘lower sections of pylons would be screened by intervening vegetation and distance, and the tops of the pylons would occasionally be just perceptible above the tree line’</i>.
Historic Environment	There are 75 listed buildings in Wortham and Burgate; 1 Grade I listed, 3 Grade II* listed, and 71 Grade II listed. Wortham Church of St Mary the Virgin is a Grade I listed building, and one of only 158 surviving churches with round towers in the country. The visual impact and close proximity of pylons RG093 – 090, and the associated works, or works to implement the Waveney Valley Alternative design, will have a negative impact on this rare and historic asset.	The Applicant has reviewed the assessment of the Church of Saint Mary the Virgin, Wortham considering Wortham and Burgate Parish Council's comments. The church is located on the eastern flank of Church Road c. 1.6 km west of the nearest pylon (RG91). The church is located within its associated graveyard, which is defined by high, tree-lined hedgerows largely obscuring views in and out. Due to overall distance, its mature graveyard vegetation, and screening in the intervening landscape by development and mature tree-lined hedgerows, copses and topography, the assessment concluded that the setting of the church does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate.
Historic Environment	Amendments to the pylon route since the previous consultation, mean it is now within much closer proximity to Burgate, specifically Little Green. Burgate Church of St Mary is Grade II* listed, with the remains of a	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Burgate Parish. The Applicant acknowledges that the settings of some designated assets within Burgate Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment

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	ringwork, currently being scheduled for listing by Historic England, and thought to be the site of a medieval manor house, to its west. There have been associated finds of pottery dated as Late Saxon to Medieval, i.e. 1001 AD to 1154 AD. Pylons RG101 to 106 will completely overshadow Burgate Church, and remove the unobstructed views to and from it.	Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Burgate Parish. The Project will not result in any substantial harm to designated heritage assets. The Applicant has reviewed the assessment of the Church of Saint Mary considering Wortham and Burgate Parish Council's comments. The Project would be partially located within the setting of the asset c. 770 m to the south-east (pylon RG104). However, due to screening by mature vegetation in the graveyard, and by mature tree-lined hedgerows, copses and topography in the intervening landscape, the Project would only be occasionally visible. The Applicant is therefore satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. The Applicant has reviewed the assessment of the scheduled monument Medieval Ringwork in Burgate Wood, which is located in Burgate Wood c. 930 m north-north-west of the nearest pylon (RG106). As the monument is located within a wood, its links to the historic landscape have been completely removed, and so the assessment concluded the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Local Planning Authority Archaeological Advisors and Historic

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		England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.
Historic Environment	A moated site at Stubbings Entry is also undergoing scheduling with Historic England, and will be directly impacted by the proximity of RG110.	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Burgate Parish. The Applicant acknowledges that the settings of some designated assets within Burgate Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Burgate Parish. The Project will not result in any substantial harm to designated heritage assets. The Applicant has reviewed the assessment of the scheduled monument Moated site at Stubbing's Entry considering Wortham and Burgate Parish Council's comments. The asset is located c. 660 m north-west of pylon RG110 within a modern working farm complex with scattered mature tree cover and several large, modern hanger-like barns. Due to the screening by the modern farm buildings and mature tree cover in the farmyard and

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		intervening landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Local Planning Authority Archaeological Advisors and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, National Policy Statement EN-1 (2024) does not require the Applicant to take any further measures.
Historic Environment	The construction work for the proposed scheme, including the Waveney Valley Alternative Design, and undergrounding work to the existing UK Power Network to the east of Burgate, will be detrimental to these	6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Burgate Parish. The Project will not result in any substantial harm to designated heritage assets in the Parish. The Applicant has reviewed the listed buildings of Burgate Parish considering Wortham and Burgate Parish Council's comments. The nearest listed building to the Order Limits is

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	historic buildings, many of which do not have foundations. The work and vibrations pose a risk to their structural integrity.	Glebe House Farm located c. 235 m north-west of the Project. This asset, and all the other listed buildings in the Parish will not be impacted by vibration resulting from the Project. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provide that the Secretary of State will take as a starting point that CNP infrastructure meets any tests which are set out within the NPSs, or any other planning policy, which require a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is so that potential 'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration, none of which are in Wortham or Burgate. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less

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		than day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations have been identified, all of which relate to potential vibratory compaction activities, none of which are in Wortham or Burgate. In all cases, significant adverse effects or potential structural damage can be avoided with the use of best practicable means. This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments, specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application (7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of 7.2 Outline Code of Construction Practice (Revision C) includes for pre- and post- condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Biodiversity, ecology and nature conservation	Biodiversity:- The construction activity between RG085 – RG110 will be devastating to the movement of the diverse and rich selection of wildlife that live in and around this area of Wortham and Burgate. Wildlife migration patterns will be disrupted and ecosystems disturbed.	Through routing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on wildlife between RG85 – RG110. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, including key wildlife corridors, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the impacts, including potential fragmentation impacts, of the current design on important ecological receptors, including within the area of Wortham and Burgate. Details of the good practice measures and mitigation to be implemented for each ecological receptor are detailed within 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice

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		(Revision C). This includes any mitigation required for fragmentation impacts for specific protected species such as bats. The key impacts that may arise from bird migration patterns is the potential for collision with new overhead lines. Collision risk has been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016)⁹¹ guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records has been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify the area around Wortham and Burgate as posing a notable collision concern.
Biodiversity, ecology and nature conservation	The powerlines will pass through natural habitats and pose risks to bird populations due to decimation of the hedgerows as well as potential collisions with the lines.	Through routeing and siting, the Applicant has avoided or minimised impacts on hedgerows. As outlined in 7.4 Outline Landscape and Ecological Management Plan (Revision D), on completion of works all areas of temporary construction impacts, including hedgerows, would be subject to replacement planting. Replacement planting will include in situ hedgerow planting, with native species of local provenance. Replacement planting will provide mitigation for temporary loss of nesting bird habitat. Collision risk has been assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016)⁹² guidance was used to determine Target Species and Secondary Species with regard to collision

⁹¹ NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

⁹² NatureScot (2016) *Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

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		risk, and the distribution of these records has been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify the area around Wortham and Burgate as posing a notable collision concern.
Biodiversity, ecology and nature conservation	Fisher German, the land agents representing National Grid advise that if the scheme goes ahead, the access roads will be removed upon completion, and the land reinstated. This is simply impossible; the hedges and trees will take years to re-establish, and the damage to ecosystems already done.	The potential impacts to trees and hedgerows have been included and assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent), including replacement planting. While blocks of woodland will be mitigated/compensated through the standard multipliers applied through the Biodiversity Net Gain (BNG) metric, the Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan (Revision D) which is secured by Requirement 4 within 3.1 Draft Development Consent Order (Revision C). 7.4 Outline Landscape and Ecological Management Plan (Revision D) includes the commitment of a five-year monitoring period for the reinstatement of woodland, tree and hedgerows following the completion of works. The five-year monitoring period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects. In addition to the EIA, the Applicant has set itself a target of delivering 10% BNG with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10% greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Full details are presented within 7.1 Biodiversity Net Gain Report [APP-299].
Biodiversity, ecology and	Wortham and Burgate are home to a variety of wildlife; bats, barn	The impacts of protected species within Wortham and Burgate, including bats, breeding birds, wintering birds, otter, water vole, hare, hedgehog, great crested newt (GCN),

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nature conservation	owls, kestrels, tawny owls, roe deer, muntjac, hares, badgers, water voles, hedgehogs, great crested newts, skylarks, yellow hammers, oyster catchers, lapwings, turtle doves, grass snakes and adders. Many of which are protected species. There is documented evidence of water voles (England's fastest declining mammal and protected under section 9 of the Wildlife and Countryside Act 1981), great crested newts (a European protected species), pipistrelle bats (protected by the Wildlife and Countryside Act), and yellow hammers (classified as a Red List bird species in the UK, and a Priority Species in the UK Biodiversity Action Plan), in Little Green Burgate.	badger, and reptiles, have been assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], with mitigation measures detailed in 7.4 Outline Landscape and Ecological Management Plan (Revision D). A full suite of protected species surveys were conducted around Wortham and Burgate including reptiles, bats, dormouse, otter and water vole, which were included in the impact assessment within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Details of these can be found in the following appendices: • 6.8.A6 Environmental Statement Appendix 8.6 - Reptile Report [APP-164] • 6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034] • 6.8.A12 Environmental Statement Appendix 8.12 - Hazel Dormouse Report [APP-174] • 6.8.A13 Environmental Statement Appendix 8.13 - Otter and Water Vole Report [AS-039] Water vole have been confirmed to be present on a number of watercourses lying within the parishes of Wortham and Burgate. Appropriate mitigation measures for water voles have been agreed with Natural England and a Letter of No Impediment (LoNI) has been received. The LoNI which states that the current scheme is licensable for water voles and the proposed mitigation is appropriate. The presence of GCN around Wortham and Burgate is known by the Applicant. The Project has committed to District Level Licensing to mitigate for any impacts on GCN. A GCN Impact Assessment and Conservation Payment Certificate has been obtained and countersigned by Natural England. Deer are not listed as protected species on Section 41 of the Natural Environment and Rural Communities Act 2006. Muntjac deer are actually classified as an invasive non-native species under The Invasive Alien Species (Enforcement and Permitting) Order 2019. As a result, projects are not permitted to implement mitigation measures that facilitate or encourage the movement or conservation of muntjac deer. Given their invasive status, no specific mitigation is required or appropriate for muntjac within the proposed works area. Deer are widespread, highly adaptable, and capable of moving freely through a variety of habitats without assistance, and the proposed construction works do not create barriers that would impede their movement.

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		Bird species recorded in the Wortham and Burgate area, including barn owl, kestrel, tawny owl, skylark, yellowhammer, oystercatcher, lapwing and turtle dove, will be protected through the measures set out in 7.4 Outline Landscape and Ecological Management Plan (Revision D). This will include seasonal timing restrictions to avoid the breeding period, pre-construction checks where required, habitat retention where practicable and reinstatement of temporarily affected habitats following construction. These measures are designed to minimise disturbance and ensure no significant or long-term adverse effects on local bird populations, including Red-listed and priority species. A range of bat species have been identified commuting and foraging within the area of Wortham and Burgate. Where key high usage bat commuting and foraging routes have been identified, suitable temporary mitigation has been included in the form of a bat flyways, to ensure no short-term impacts on bats. This includes two locations within Burgate and Wortham. Full details on the bat activity surveys are presented within 6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036].
Biodiversity, ecology and nature conservation	Wortham Ling has a biological SSSI designation on account of its dry lowland heath and acid grassland vegetation. However, the acid heath and grasslands on the Ling also co-exist with small pockets of chalk grassland, which is extremely rare in Suffolk.	Wortham Ling Site of Special Scientific Interest (SSSI) has been avoided by the Project, with the proposed 400 kV overhead line routeing to the east. Potential impacts on Wortham Ling SSSI have been included and assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . No impact pathways have been identified that would affect Wortham Ling SSSI, following the implementation of mitigation measures detailed in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D) .
Biodiversity, ecology and nature conservation	The Ling also supports Small Heath butterfly, a priority species for conservation, on account of a nationwide decline.	Wortham Ling Site of Special Scientific Interest (SSSI) has been avoided by the Project, with the proposed 400 kV overhead line routeing to the east. Potential impacts on Wortham Ling SSSI have been included and assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . No impact pathways have been identified that would affect Wortham Ling SSSI or the associated small heath butterfly, following the implementation of mitigation measures detailed in 7.2 Outline Code of Construction Practice (Revision C) and 7.4 Outline Landscape and Ecological Management Plan (Revision D) .

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		Small heath butterfly is typically supported by heathland, downland and coastal dune habitats that are not present in within the Order Limits, and therefore no impacts are anticipated for the species. Although foodplants include grasses such as fescues, meadow-grasses and bents, on completion of works all areas of temporary construction impacts would be subject to replacement planting, returning the habitat type that was lost, to its original condition, as outlined in 7.4 Outline Landscape and Ecological Management Plan (Revision D). No significant residual impacts to the small heath butterfly have been identified.
Biodiversity, ecology and nature conservation	Suffolk Wildlife Trust, working with local landowners, have recently embarked upon a Landscape Recovery project called WaLOR (Waveney and Little Ouse Recovery Project) to enhance natural heritage of the landscape and combat declines in biodiversity. We are concerned that the proposed scheme, whether delivered by way of 50m pylons, or the Waveney Valley Alternative underground cabling, would be completely contrary and detrimental to this project. The UK government has made a commitment under the G7 Nature compact biodiversity and sustainability agreement to 'support and drive the protection, conservation and	The Applicant has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable and is actively engaging with the WaLOR project team on a regular basis. With the overhead line solution through the Waveney Valley and other carefully designed construction elements, impacts on the WaLOR project will be minimised and the WaLOR objectives will not be adversely affected by the Project. Full details on the engagement to date on the WaLOR are presented within 5.9.18 Draft Statement of Common Ground - Suffolk Wildlife Trust [REP1-044]. The Applicant is committed to ongoing collaboration with the WaLOR project team to ensure successful delivery of both projects. The Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects both in terms of construction working areas and programme. The UK Government is committed to achieving clean electricity by 2030 as set out in the Clean Power 2030 Action Plan⁹³. Clean Power 2030 is considered key to accelerating and reaching net zero by 2050. This represents the latest government policy and position on clean energy. Under its transmission licence, the Applicant has a statutory duty to respond to generation customers wanting to connect to the transmission network, whether this be for wind, solar, nuclear, tidal or from other forms of generation. To support the target to conserve or protect 30% of global land, the Applicant has taken every effort to avoid high value ecological features including statutory designated sites, non-statutory designated sites, irreplaceable habitats, habitats of principal importance for

⁹³ Department for Energy Security and Net Zero (2024) *Clean Power 2030 Action Plan: A new era of clean electricity*

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	restoration of the ecosystems critical to halt, and reverse biodiversity loss and tackle climate change, such as supporting the target to conserve or protect at least 30% of global land'. Wortham and Burgate Council strongly upholds these values, which National Grid seemingly does not.	conserving biodiversity and habitats of value to protected species, through routeing, siting and detailed design. The Applicant has also committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. 7.4 Outline Landscape and Ecological Management Plan (Revision D) sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent). On completion of works, all areas of temporary construction impacts would be subject to replacement planting, returning the habitat type that was lost, to its original condition. This would ensure the Project avoids biodiversity loss and ecosystems are re-established.
Transport and Traffic	Public Rights of Way:- The proposed scheme, notably pylons RG090 to RG110 will directly affect the extensive network of footpaths, bridleways and byways in Wortham and Burgate, including the Angles Way, making them unsafe for horse riders, walkers, dog walkers, the Wortham Walkers Group and nearby Mellis Cani-Cross Group who use them regularly. Residents' daily lives, routines and leisure activities will be affected, which in turn impacts on mental health and well-being	The Applicant notes the concern regarding Public Rights of Way (PRoWs) in the vicinity of Wortham and Burgate. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the PRoWs noted between Pylons RG090 and RG110, eighteen PRoWs will be affected, including the Dams Lane/Dury Lane Other Route with Public Access (ORPA), thirteen footpaths, two bridleways and two Byways Open to All Traffic (BOATs). However, the majority of these will remain open on their existing alignments with access managed as necessary in accordance with 7.6 Outline Public Rights of Way Management Plan [APP-329]. Where these PRoWs intersect with working areas, appropriate safety measures will be implemented to allow continued safe passage for PRoW users during construction of the Project. Footpaths W-389/002/0, W-172/027/0, W-172/036/0 and Bridleway W-172/022/0 will also be subject to temporary closure of some of their length for a period of time, with a localised diversion provided around the perimeter of working areas. The Angles Way, located in Roydon, South Norfolk, will also be subject to a managed access regime and appropriate safety measures where it runs from The Doit along

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		Roydon South Norfolk Footpath 14, along with a temporary localised diversion around the perimeter of a working area. Further details for each affected PRow are provided in 7.6 Outline Public Rights of Way Management Plan [APP-329]. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected will be reinstated as soon as practicable to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRow management arrangements are developed. An assessment of the residual effects on delay to users of PRowS within Wortham and Burgate Parish can be found within in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Where temporary closures with diversions are proposed, an assessment of residual effects on delay is presented within Table A16.4.3 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Footpaths W-389/002/0, W-172/027/0, W-172/036/0, Roydon South Norfolk FP14 and Bridleway W-172/022/0 will temporarily be diverted for a short duration with an increase in journey length less than 500 m and a maximum journey time increase of two minutes in footpath W-172/036/0. Therefore, no significant impact on delay to PRow users is anticipated once the mitigation measures defined in 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. A recreational route assessment has been undertaken as part of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. No significant adverse effects have been identified for recreational routes located within Wortham and Burgate Parish Council. An assessment of the impacts of the Project on physical activity as a result of changes to PRowS and areas of open space during construction has been undertaken, with conclusions set out in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The chapter notes that physical activity is important for both physical and mental health and wellbeing, with recreational routes providing opportunities for relaxation, stress reduction, and mental restoration, all of which are relevant to overall wellbeing. Table 10.13 of 6.10 Environmental Statement Chapter 10 – Health and

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		Wellbeing [APP-192] categorises wards along the Project route according to the scale of potential impact relating to physical activity; Gislingham ward, within which Wortham and Burgate Parish is located, is categorised as a ward where the potential impact on physical activity is likely to be low by virtue of the fact that a relatively small number of PRowS or areas of open space are affected. Whilst a small minority of the population would be affected in each ward through which the Project route passes, alternative routes are generally available for use for the period over which effects are predicted to last. Whilst physical activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of PRowS) are generally short term, with rapid reversal / diversions in place and no significant effects on health and wellbeing have been identified.
Socio-Economics, Recreation and Tourism	There are many horse owners in and around the parishes, with a livery at Hall Farm in Burgate. As well as being affected by the impact on bridleways, riders use the lanes daily, which they will no longer be able to do safely. In addition, the overhead high voltage power lines are incompatible with horses. Horses are prey animals and the low frequency noise and magnetic fields can cause a flight reaction.	The possible effects of electric and magnetic fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in NPS EN-5 (2024) paragraph 2.9.58 which states: '<i>There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.</i>' Although horses are not directly mentioned, there is no evidence to suggest they are any different to other farm animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project has been designed in accordance with the principles of the government's voluntary Code of Practice⁹⁴ to ensure these are mitigated, which include equestrian activities. Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are used for equestrian activities. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of

⁹⁴ Department of Energy and Climate Change (2013) *Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields*

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		the potential impacts on equestrian centres and activities located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption.
Socio-Economics, Recreation and Tourism	Many cyclists use the road networks in and around Wortham and Burgate. The Wolf Way is a 250-mile cycle route which passes through Little Green in Burgate. The increase in traffic and HGVs from the proposed scheme will mean that this is no longer a safe or viable route for cyclists.	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure, including walking, cycling and horse-riding routes. The Wolf Way cycle route runs east-west through the Project along Bridleway W-172/022/0, Byway Open to All Traffic (BOAT) W-172/035/0 and the Other Route With Public Access (ORPA) Furze Way. These will remain accessible throughout construction either on their existing alignment under a managed access regime, or in the case of Bridleway W-172/022/0, via a short period localised diversion around a working area. Where they are under a managed access regime and intersect with working areas, appropriate safety measures will be implemented to allow continued safe passage for users. Details for mitigation and control measures can be found within 7.6 Outline Public Rights of Way Management Plan [APP-329]. The construction effects on pedestrians, cyclists and horse-riding have been assessed within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. This concludes that there would be no significant effects on delay when the mitigation and control measures identified within 7.6 Outline Public Rights of Way Management Plan [APP-329] are applied. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on recreational routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on recreational routes. These are identified within 7.2 Outline Code of Construction Practice (Revision C); 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. No significant adverse effects have been identified for cycle routes located within the Wortham and Burgate Parish Council area. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] assesses the potential for increased risk to users of the roads (including pedestrians and cyclists) as a result of construction traffic. The chapter notes that, while the addition of any amount of traffic can increase the risk of collisions, it is considered that for the majority of

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		road links along the Project route, the temporary increase in construction traffic associated with the Project is unlikely to materially affect safety and that, with appropriate mitigation as set out in 7.3 Outline Construction Traffic Management Plan (Revision B), no significant effects are identified. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] also assesses disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329].
Transport and Traffic	Construction and Traffic Impact:- The increase in traffic and HGVs during construction of the pylons, access roads, compounds, all associated works, and potential Waveney Valley Alternative design, will have an unacceptable impact on Worham and Burgate.	The Applicant is proposing a construction routeing strategy as detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The strategy proposed to route construction traffic along agreed Primary Access Routes (PARs) to the site access points from the Strategic and Major Road Networks. From the site access points, construction traffic will travel along the internal haul road. There are no PARs routed through the Worham or Burgate Parish. The closest PAR to Worham is along the A143 Old Bury Road (PAR 10) and Lion Road (PAR 11) as shown on Figure 1 page 6 of 30 in 7.11 Transport Assessment - Appendix I - Figures [APP-342]. An assessment of construction residual effects on driver and public transport passenger delay was undertaken for A143 Old Bury Road (PAR 10) and Lion Road (PAR 11). The findings are presented within Table A16.4.2 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275], and it was found that there would be no significant effects on delay. The Applicant is proposing an increase of 80 LGV and 27 HGV movements on PAR 10 and 17 HGV movements on PAR 11, in the AM and PM peak hours, for a peak duration of one and four weeks respectively as presented within 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. Section 7.11 of 7.11 Transport Assessment [APP-333] presents the findings of junction modelling undertaken on the A140 Ipswich Road / A143 Old Bury Road roundabout (Site 16) on PAR 10. The results indicate that overall, the introduction of

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		the Project traffic in the AM peak has a minor impact upon junction capacity. All arms operate within capacity in the PM peak hour. The impact on the A143 Old Bury Road / Lion Road Priority Junction (Site 18) which connects PAR 10 and PAR 11 was also assessed. The assessment concluded that that the roundabout operates within capacity across all scenarios and time periods, with no significant delays.
Transport and Traffic	National Grid's intention to underground the existing 30m tall UKPN pylons to the east of Burgate will have a hugely detrimental impact, specifically to PROW, Grade II* listed Burgate Church, other nearby listed buildings, farmland, and flood control.	The Applicant has responded regarding impacts on PROWs above. Through routing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Burgate Parish. The Applicant acknowledges that the settings of some designated assets within Burgate Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Burgate Parish. The Project will not result in any substantial harm to designated heritage assets. The Applicant has reviewed the assessment of the Church of Saint Mary considering Wortham and Burgate Parish Council's comments. The Project would be partially located within the setting of the asset c. 770 m to the south-east (pylon RG104). However, due to screening by mature vegetation in the graveyard, and by mature tree-lined hedgerows, copses and topography in the intervening landscape, the Project would only be occasionally visible. The Applicant is therefore satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate.

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		The Applicant has reviewed the assessment of other listed buildings near the Church of Saint Mary considering Wortham and Burgate Parish Council's comments. The impacts of the Project on the listed buildings near the Church of Saint Mary are assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The Applicant is confident that the conclusions reached on the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and the level of harm on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are both proportionate and appropriate. The Project would lead to no harm or less than substantial harm on the listed buildings near the Church of Saint Mary. In relation to farmland, The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed ALC surveys, of the extent of each land grade within Wortham and Burgate Parishes (a mix of Grade 2, Grade 3a and Grade 3b land). Soil management measures to be implemented during construction across the Project, including across Wortham and Burgate Parishes, to protect the soil resource, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post-construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. It is acknowledged in 7.9 Flood Risk Assessment [APP-331] that some of the works to UK Power Networks pylons (referred to as 'third-party infrastructure works') will be within areas at risk of flooding. 7.9 Flood Risk Assessment [APP-331] refers to the suite of measures that would be in place to manage risks during construction of the Project which includes these third-party infrastructure works referred to by Wortham and Burgate Parish

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		Council. These measures include for example, managing construction works sites in accordance with the Flood Warning and Evacuation Plan (7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]). The measures are detailed in 7.2 Outline Code of Construction Practice (Revision C). 7.9 Flood Risk Assessment [APP-331] addresses the potential for construction works to impact surface water flooding through changes to existing land surface permeabilities and influences on the rainfall runoff regime. The Drainage Strategy (8.2 Drainage Strategy DCO [REP1-072]), submitted at Deadline 1, provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled.
Transport and Traffic	Furze Way and Stonebridge Way are both byways which will be hugely impacted by pylons RG108 to 105, and the undergrounding of the existing UK Power Network. They are due to be used as service roads, for which they are completely unsuitable. Furze Way has been the subject of complaints from residents for many years, due to the poor state of repair making it hazardous for vehicles, pedestrians, horses and cyclists, and prone to flooding. Yet it is due to be used as a service road, which is simply unacceptable. The Parish Council has been campaigning for many years to address public and road safety concerns with the A143 as it passes through the village, and to extend the	The Applicant notes the concern regarding Furze Way (Byway Open to All Traffic W-172/035/0) and Stonebridge Way (Byway Open to All Traffic W-172/034/0). As set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], both of these byways will remain open on their existing alignments throughout construction, with access managed as necessary where they interact with construction activities. Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan. All PRoWs temporarily affected by the works will be reinstated as soon as reasonably practicable, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. The construction routeing strategy is detailed within Section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. From the site access points, vehicles will then travel on the haul road. Furze Way and Stonebridge Way are not proposed to be used as a PAR during construction. The Red Line Boundary detailed on Furze Way is an easement which the Applicant is seeking for permanent access during operation of the Project (displayed in Figure 1 Page 10 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]). Detailed in 6.4 Environmental Statement Chapter 4 Project Description [APP-130] during operation (and maintenance), the Applicant would require infrequent access to

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	30mph speed limit on Mellis Road. In National Grid's Preliminary Environmental Report, Appendix 16.3 shows the expected increase in HGV traffic on the A143 as being 20%, made up by an additional 478 vehicles daily, of which 268 will be HGVs. This is unacceptable for an extremely busy road, which is already the subject of public and road safety concerns, and the site of a busy primary school. The three lanes leading in and out of the proposed hall roads in Little Green Burgate are completely unsuitable for HGVs. They are narrow single-track lanes, with very few passing places, raising huge health and safety concerns.	ensure the operational Project is appropriately surveyed, assessed, and maintained. Access would typically be made by foot, 4x4 or tractor and trailer. The Applicant is proposing to temporarily reduce the speed on Mellis Road, between TR-B-018 and TR-B-019 (to the junction with Thornham Road) as shown in 2.4 Traffic Regulation Order Plans – Section B [APP-026]. The Applicant is proposing to route construction traffic along the A143 Old Bury Road (PAR 10) onto Lion Road (PAR 11) as presented on Figure 1 page 6 of 30 in 7.11 Transport Assessment - Appendix I - Figures [APP-342]. The Applicant is proposing to temporarily reduce the speed to 50 mph on A143 Old Bury Road, Palgrave, between TR-B-007 and TR-B-008, detailed in 2.4 Traffic Regulation Order Plans – Section B [APP-026]. The Applicant recognises the road safety concerns raised by Wortham and Burgate Parish Council, but notes that the Project is not proposing to route construction traffic through the villages of Wortham and Burgate and past sensitive receptors. The Applicant is also not proposing to route construction traffic along the small lanes in Little Green/ Burgate, displayed in Figure 1 Sheet 10 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]. These are locations where crossing points are located on Burgate Road and Mellis Road. Construction vehicles are not permitted to join/leave the public highway in these locations, unless detailed within 7.3 Outline Construction Traffic Management Plan (Revision B). These include emergency access and contingency access. In 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the Applicant proposes an increase of 80 LGV movements and 27 HGV movements on the A143 Old Bury Road (PAR 10) in the AM and PM peak hours for a peak duration of one week, representing a 16% increase in overall traffic. Image E.10 presents the total vehicle movement distribution across the construction programme. An assessment of significance of residual construction effects has been undertaken for all PARs as presented within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. For A143 Old Bury Road (PAR 10) it was concluded that there would be no significant effects when taking account of mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan (Revision B).

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Water environment	Both Wortham and Burgate have suffered significant localised flooding in recent months, with some roads becoming impassable, and several properties in Burgate being subjected to internal flooding. The Parish Council has concerns that the flood risk will increase significantly as a result of disruption to the natural drainage of surrounding farmland, from undergrounding of the UK Power Network to the east of Burgate, and damage to verges and ditches caused by HGVs and construction traffic.	The Applicant acknowledges that the Project will pass through some areas that have flooded in the past. 7.9 Flood Risk Assessment [APP-331] has incorporated information on local flood history, including information from Suffolk County Council and Burgate Little Green residents. Potential impacts on the existing land drainage regime from activities, such as those raised by Wortham and Burgate Parish Council, have been considered in 7.9 Flood Risk Assessment [APP-331]. The Project has secured a suite of mitigation measures to avoid increasing flood risk and to reduce negative effects on the land drainage regime. Measures have also been secured with respect to the crossing of ditches/watercourses for construction vehicles. The measures are referred to in 7.9 Flood Risk Assessment [APP-331], detailed in 7.2 Outline Code of Construction Practice (Revision C) and have been agreed with the Environment Agency. The Drainage Strategy (8.2 Drainage Strategy DCO [REP1-072]), submitted at Deadline 1, provides additional information as to how negative effects on the land drainage regime would be managed and controlled.
Transport and Traffic	The same report states the number of vehicles on Burgate Little Green's roads will increase by 251 vehicles a day, 84 of which will be HGVs. If the baseline survey had included 1 vehicle, and not 0 as recorded by National Grid, the increase would equate to 25,100%, which would be the highest increase along the route. This increase will put pedestrians, including school children and elderly residents who walk along these	The Applicant has developed a construction routeing strategy detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. From the site access points, vehicles will then travel on the haul road. The Applicant is not proposing to route construction vehicles on the roads in Little Green, including Burgate Road, Buggs Road and Mellis Road. This is detailed in detailed in Figure 1 Sheet 10 of 7.11 Transport Assessment - Appendix I - Figures [APP-342].

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	roads to access bus services on the Mellis Road, at extreme risk.	
Transport and traffic	The expected increase in HGVs on nearby roads is similarly unbelievably high: Thornham Road – 371% increase Eastlands Lane – 6308% increase Lion Road – 215% increase B1113 – 93% increase The Parish Council has concerns that an increase from local and through traffic, using alternative roads to avoid those officially being used for construction traffic, will be seen.	The Applicant has developed a construction routing strategy detailed in 7.3 Outline Construction Traffic Management Plan (Revision B). The Applicant is proposing to route construction traffic along Primary Access Routes (PARs) from the Major and Strategic Road Networks to the site access points. From the site access points, vehicles will then travel on the haul road. The proposed PARs are displayed in Figure 1 of 7.11 Transport Assessment - Appendix I - Figures [APP-342]. A summary of the proposals for the roads noted by Wortham and Burgate Parish Council is as follows: - Thornham Road/Major Lane (PAR 15) – the Applicant is proposing a short section of PAR between RG-B077 and RG-B078 to allow construction vehicles to continue travelling on the internal haul road. Construction traffic will give-way to users of the public highway. As noted in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the Applicant is proposing an additional eight HGV movements in the AM and PM peak hours along this section of road for a peak duration of 22 weeks. During the worst-case daily peak construction activity there would be a total of 119 vehicle movements, consisting of 100 HGV movements as detailed within Table A16.4.1 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Image A16.4.15 presents the construction vehicles daily trip distribution across the construction programme. The surveys completed by the Applicant noted a baseline count of 35 HGV movements. As a result of the vehicle numbers being low, the percentage increase is notably high, in relation to the estimated small number of construction vehicles within the peak. Table A16.4.6 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] identifies there would be no significant residual effects on PAR 15 when taking account of mitigation within 7.3 Outline Construction Traffic Management Plan (Revision B). - Eastlands Lane (PAR 14) – The Applicant is proposing an increase of 13 HGV movements in the AM and PM peak, over a duration of 22 weeks as noted within 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. During the worst-case daily peak

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		construction activity there would be a total of 178 vehicle movements, consisting of 150 HGV movements as detailed within Table A16.4.1 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Image A16.4.14 presents the construction vehicles daily trip distribution across the construction programme. The surveys completed by the Applicant noted a baseline count of two HGV movements. As a result of the vehicle numbers being low, the percentage increase is notably high, in relation to the estimated small number of construction vehicles within the peak. Table A16.4.6 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] identifies there would be no significant residual effects on PAR 14 when taking account of mitigation within 7.3 Outline Construction Traffic Management Plan (Revision B). Lion Road (PAR 11) – The Applicant Is proposing an additional 17 HGV movements along Lion Road in the AM and PM peak hours over a duration of four weeks. During the worst-case daily peak construction activity there would be a total of 250 vehicle movements, consisting of 204 HGV movements as detailed within Table A16.4.1 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Image A16.4.11 presents the construction vehicles daily trip distribution across the construction programme. The surveys completed by the Applicant noted a baseline count of 64 HGV movements. As a result of the vehicle numbers being low, the percentage increase is notably high, in relation to the estimated small number of construction vehicles within the peak. Table A16.4.6 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] identifies there would be no significant residual effects on PAR 11 when taking account of mitigation within 7.3 Outline Construction Traffic Management Plan (Revision B). B1113 Finningham Road (PAR 12) – In the AM and PM peak hours, the Applicant is proposing an additional 26 HGV movements along Finningham Road, for a peak duration of two weeks (7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]). During the worst-case daily peak construction activity there would be a total of 372 vehicle movements, consisting of 316 HGV movements as detailed within Table A16.4.1 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction

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		Effects [APP-275]. Image A16.4.12 presents the construction vehicles daily trip distribution across the construction programme. The surveys completed by the Applicant noted a baseline count of 143 HGV movements. As a result of the vehicle numbers being relatively low, the percentage increase is notably high, in relation to the estimated small number of construction vehicles within the peak. Table A16.4.6 in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] identifies there would be no significant residual effects on PAR 12 when taking account of mitigation within 7.3 Outline Construction Traffic Management Plan (Revision B).
Noise and Vibration	The Parish Council also objects to the amount of noise from construction work should the project go ahead. This construction activity will result in varying amounts of noise each day from 24 decibels up to 110 decibels.	An assessment of construction noise is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment indicates that significant adverse effects from construction noise are not expected where appropriate mitigation measures are incorporated into the works. The contractor is committed to employing such measures as per the various commitments detailed in 7.2 Outline Code of Construction Practice (Revision C). Additionally, further detailed construction noise assessments will be undertaken by the contractor, as per Commitment NV05 of 7.2 Outline Code of Construction Practice (Revision C) based on their specific methodologies. Based on the findings of these assessments, specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]).
Landscape and Visual	In addition, the proposed working hours are unacceptably long and include weekends and Bank Holidays. As the nights draw in, flood lights will be needed to light the construction which will visually impact our dark night skies with light pollution.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: - Monday – Friday: 07:00 to 19:00 - Saturday, Sunday and bank holidays/public holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 Draft Development Consent Order (Revision C). The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying

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		shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The construction working hours set out in 3.1 Draft Development Consent Order (Revision C) define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in 7.2 Outline Code of Construction Practice (Revision C) which includes commitments to controlling construction and permanent lighting (GG26) The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays/bank holidays would materially harm the deliverability of this critical national priority project. The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters; these include the core working hours for the construction phase of the Project. 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice (Revision C), significant effects from noise and vibration during the construction phase are not anticipated. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft

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		Development Consent Order (Revision C) within the final Code of Construction Practice.
Socio-Economics, Recreation and Tourism	Local Businesses, Properties and Mental Health/Wellbeing:- There are many local businesses in Wortham and Burgate which will be negatively impacted by the proposed scheme. Many of these are tourist led such as holiday lets, and rely on visitors who are attracted by the wildlife, unique landscapes, and heritage of the parishes.	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations important for leisure and tourism. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] presents an assessment of the potential impacts on tourism economy (during construction), business premises (during construction and operation) and tourism assets (during construction and operation), including visitor accommodation. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on tourism. These include traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] , 7.2 Outline Code of Construction Practice (Revision C) and 7.3 Outline Construction Traffic Management Plan (Revision B) . No significant adverse effects have been identified for business premises or tourism assets receptors located within Wortham and Burgate Parish Council.
Land and Property	The proximity of the pylons will also negatively impact property prices. The Parish Council is aware that knowledge of National Grid's proposals is already affecting interest in the village and property values.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaulay-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices.

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		It concludes that: - House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauly-Denny power line. - Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.
Health and Wellbeing	The Parish Council is aware that knowledge of National Grid's proposals is already affecting interest in the village and property values. This, combined with the other key impact issues is causing high levels of anxiety and distress to residents, affecting their mental health and well-being.	6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] provides an assessment of the impacts of the Project on both physical and mental health and wellbeing during construction and operation phases. The Applicant recognises that uncertainty whilst the proposals are developed may cause stress and anxiety, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. In respect to impacts on mental health and wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners. Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in 7.2 Outline Code of Construction Practice (Revision C). No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase.

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		The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns. The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example, visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment notes that changes in the appearance of an area can impact people's mental health and wellbeing due to changes in the way they feel about an area or place or concerns about how the new infrastructure may impact their life plans (for example retirement or property values). The chapter concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email throughout the progress of the Project: • Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) • Email: contact@n-t.nationalgrid.com • Write to us: FREEPOST N TO T (No stamp or further address details are required).
Planning policy	Breaches of Holford Rules:- The Parish Council believes there are several breaches in the guidelines on overhead line routing, first formulated in 1959 by Sir William later Lord Holford, who was a part-time member of	The Applicant disagrees that the Holford Rules have not been considered. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use

Topic	Comment	National Grid's response
	the CEGB. They are known as the 'Holford Rules.' National Grid continues to employ them as a basis of the company's approach to overhead line routing. Rule 2: Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e., the more massive structures which are used when lines change direction. Where possible choose routes which minimise the effects on the setting of areas of architectural, historic, and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments; - Wortham Ling is a SSSI, Wortham Long Green is a VIOS, Redgrave and Lopham Fen National Nature Reserve to the west of Wortham Ling is both an SSSI, an NNR and a RAMSAR site. Burgate Wood is a 75-acre medieval woodland and an SSSI. Wortham Church is Grade I listed. Burgate Church is Grade II* listed. The route passes in close proximity to many other listed buildings in	the Environmental Impact Assessment (EIA) process to inform the balance and define the proposals that we take forward, which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Impacts on statutory designated sites such as Wortham Ling Site of Special Scientific Interest (SSSI), Redgrave and Lopham Fen National Nature Reserve (NNR), Ramsar and SSSI and Burgate Wood SSSI have been included and assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. No significant residual effects are anticipated for any of these statutory designated sites. With regard to the historic environment, and in particular the impacts of the Project on the Church of Saint Mary the Virgin, Wortham, and the Church of Saint Mary, Burgate, have been addressed in length above. The assessment of these assets, however, can be found in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

Topic	Comment	National Grid's response
	Wortham and Burgate. Rule 3: Where possible choose inconspicuous locations for angle towers, terminal towers and sealing end compounds; the siting of a compound at byway Furze Way/Stonebridge Way, and Dam Lane will be completely conspicuous. Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees: - The route will site 50-metre-high pylons against the large sky background in Wortham and Burgate of open countryside, Common Land and farmland. Rule 5: Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees: - The ruling states 'Where possible avoiding cutting extensive swathes through woodland	

Topic	Comment	National Grid's response
	blocks and consider opportunities for skirting edges of copses and woods. Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape'; – the pylon route cuts through a beautiful, wooded area at the bottom of Furze Way in Burgate, and runs within close proximity to Burgate Wood which is an ancient medieval woodland and an SSSI. Wortham Ling SSSI, is rich in existing vegetation which enjoys the acid grassland and sandy soil, and is bordered by areas of woodland. It will be negatively impacted by the placement of pylons, or undergrounding.	
Consultation	CONSULTATION Wortham and Burgate Parish Council does not consider it has been consulted in a way that is open, fair or transparent, and the consultation presented has been legally deficient since 2022. The Parish Council has identified the following deficiencies in National Grid's consultation process: Consultation meetings have all been timed for during the	The Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].

Topic	Comment	National Grid's response
	working day, denying working people the chance to have their say. There has only been one meeting in Gislegham, timed 1pm-6pm. The meetings were felt by members of the public not real consultation more paying lip service to a process. The Public Consultation/Information Events have been held in locations inaccessible by public transport. The Parish Council and its residents were not consulted when the proposals were at a formative stage. The route was predetermined. The decision for pylons was also predetermined. This is against the Gunning Principles. Information on the proposals has been inaccessible to many people. The maps sent to householders are small scale area maps, generic and lacking in detail. Information has only been sent to householders within 1km of the pylon line when the visual impacts of the project are far wider. The interactive online map does not show all properties, only listed buildings. Internet access is required to fully access the proposals and their supporting	The Applicant does not agree that consultation has been undertaken in a way that is not open, fair or transparent. The Applicant carried out consultation in accordance with the Planning Act 2008, relevant guidance, and established best practice, and has sought to provide a range of opportunities for communities, stakeholders and Parish Councils to engage with the proposals and provide feedback. As much as possible, consultation events were held with at least two weeks' notice after the opening of each consultation. Events were signposted via the community newsletter, the website, letters to stakeholder groups and through media engagement. In terms of timing, the Applicant aimed to hold events at a range of times on different days, including at weekends. To do so, the Applicant needed to balance a range of factors, including accessibility, venue availability and to ensure welfare. The Applicant recognises that not everyone will be able to make events, which is why webinars were held and recorded. We also have a hotline, email address and freepost address should anyone wish to talk to a member of the team. The Applicant wrote to properties within a 1 km consultation zone – more than 81,000 properties in total but advertised more widely including writing to host and neighbouring Parish Councils and via social media. This was set out within the Statement of Community Consultation and deemed proportionate through consultation with local authorities. The interactive map showed a range of 'layers' which could be toggled on and off, and which included heritage assets such as listed buildings. If users want to view individual properties, the map could be viewed as a 'satellite' image, which shows homes and properties in more detail. The Applicant recognises that not all individuals have easy access to the internet. For this reason, non-digital consultation methods have been provided, including printed materials, staffed events, and the ability to request information by post or telephone. The Applicant provided trained staff at consultation events to explain the proposals and answer questions. The Applicant does not accept that staff avoided responding to questions; where information was not available, queries were logged and could be followed up.

Topic	Comment	National Grid's response
	information The supporting documents on National Grids website are not labelled or indexed in a way that makes them straightforward to access. Information is being deliberately obscured. National Grid has failed in making residents aware of the increased traffic requirements to build the infrastructure. National Grid has failed to make the information available and user friendly for the residents. Staff at the consultation/information events have not had the necessary knowledge to respond to queries. Parishioners report that staff have avoided responding to pertinent questions. There has been no personal engagement with homeowners who are adversely affected.	
Consultation	Homeowners do not feel the issues they have raised in feedback to previous consultations have been addressed.	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory

Topic	Comment	National Grid's response
		consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122] .
Consultation	Homeowners seek personal engagement given the life changing impact of these proposals	The Applicant recognises the importance of engagement with those most directly affected. Opportunities for one-to-one engagement have been, and will continue to be, made available, including through written correspondence and dedicated points of contact.
Property and Compensation	The impact of the proposals on property prices has not been assessed. This is an important omission in the process	The Applicant is promoting what is termed a 'Nationally Significant Infrastructure Project' (NSIP). The process by which the Project must progress through the planning process is set out in the Planning Act 2008 and associated guidance. In addition, the potential impacts of the proposal are required to be assessed under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.. There is no requirement for a potential effect on property prices to be assessed or included in the costing of options. Potential impact on property prices is not a material planning consideration for the purposes of a DCO application.
Health and Wellbeing	National Grid has made no attempt to assess the impact of the proposals on health and mental health/wellbeing. This is an important omission in the process.	An assessment of the impact of the proposals on health, including both physical and mental health and wellbeing is provided in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. No significant impacts on health and wellbeing have been identified during either the construction or operation (and maintenance) phases of the Project. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns.
Consultation	National Grid has failed to give residents any faith in the process –most have been left	The Applicant does not agree that consultation has been undertaken in a way that is not open, fair or transparent. The Applicant carried out consultation in accordance with the Planning Act 2008, relevant guidance, and established best practice, and has sought to

Topic	Comment	National Grid's response
	with the impression that their views will be ignored, and that the outcome is a foregone conclusion.	provide a range of opportunities for communities, stakeholders and Parish Councils to engage with the proposals and provide feedback.
Alternatives	When the targeted consultations were held January to March 2025, the decision to renege on the Waveney Valley Alternative proposal was not included. Given the importance of this specific area, it is inconceivable that there was no consultation on this decision.	Waveney Valley alternatives were consulted on during statutory consultation in 2024, the outcomes of which were communicated to the public in January 2025 following further technical appraisal. The purpose of the targeted consultations held in spring 2025 was to share proposals for a series of small changes along the route.

2.65 Writtle Parish Council

- 2.65.1 Table 2.65 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Writtle Parish Council **[RR-3857]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.65 Comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	Writtle Parish Council The consultation has been, and remains, inadequate; valid alternatives have not been presented and the harm of National Grid's preferred solution significantly outweighs the benefits. See Appendix I (to follow) the complaint sent by Writtle Parish Council to National Grid about shortcomings of Chelmsford public information event. National Grid's Norwich to Tilbury pylons proposal is deeply damaging to the community of Writtle. Writtle Parish is directly impacted by pylons TB157 to TB175, and we have the following comments to make. While accepting the need to move power from the North Sea to London, Writtle Parish Council objects to the National Grid Norwich to Tilbury pylon	The objection of Writtle Parish Council is noted. The Applicant disagrees consultation was inadequate. As a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP project for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007].

proposal, based on the harm it would cause to residents, heritage, landscapes, farming, property values, businesses, recreation, wildlife and the environment. This is on the basis of the objections set out in this submission and in earlier consultation responses and by the Essex, Suffolk, Norfolk Pylons action group, the North West / South West Chelmsford Parishes Group and ARU Writtle whose submissions, including to this Statutory Consultation, we endorse. The consultation has been, and remains, inadequate; valid alternatives have not been presented and the harm of National Grid's preferred solution significantly outweighs the benefits.

Alternatives

Alternatives that we support which are better for the environment, our Parish and have a lower cost overall. None of these alternatives have ever been presented for consultation by NGET, despite repeated requests since the first consultation in 2022. Alternatives which require appraisal, following Treasury Green Book guidance, are: -

National Grid considered alternatives in the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives.

In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in **Chapter 15 [APP-357]** the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base).

Upgrading of the existing grid using Grid-Enhancing Technologies (GETs) such as dynamic line ratings, advanced power flow controls, advanced conductors (specifically TS Conductor), transmission switching and conversion from Alternating Current overhead lines (AC OHL) to direct current (DC) OHL - Brownfield site at Bradwell-on-Sea using of existing infrastructure for a landing point for wind farms and interconnectors otherwise offered connections into N2T - A fully Integrated offshore grid - including platforms for technology - High Voltage Direct Current HVDC undergrounding from N2T or subsea.

A range of suggested network enhancement measures that have been considered and rejected, is set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]:**

- LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings
- TS Conductor — High Temperature Low Sag (HTLS) conductor
- Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors
- Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation
- EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages
- Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.

In relation to utilising existing infrastructure at Bradwell-on-Sea, there is an existing overhead line connection to the Bradwell B site. This has been operating at lower voltage (132 kV) and has not been used for a few years and is in generally poor condition. This overhead line would need to be rebuilt, however, any rebuild to make this onward connection via Rayleigh to Tilbury is also constrained by urban development and further designations and some sections may need to be re-routed if connections were made at Bradwell. Additionally, this connection does not meet the requirement of the need case in relation to either EC5 or Sizewell Gen Group. If just forming a connection point for the customers, any connection point also requires two points of connection to the National Electricity Transmission System (NETS) (to meet compliance standards) requiring either a double overhead line through the Bradwell peninsula and onwards to separate locations or a connection back to Bramford (in addition to one towards Tilbury). A connection to Bramford would require connections to cross the Special Protection Area (SPA) designated Blackwater Estuary (3 km to 7 km tunnel likely to be required at much greater cost) as well as interact with other Special Area of Conservation (SAC) and SPA designations. The existing network through Norfolk, Suffolk and Essex would also still need to be upgraded to transport the electricity due to come onto the network in the

		Norwich area and provide the necessary two points of connection to the NETS. Taken together a Bradwell point of connection requires a greater amount of new infrastructure and is therefore less economic and efficient and expected to be associated with greater environmental effects. See also 5.1 - 2025 Consultation Report [APP 066] - response code 9-2.756 and 7.20 - 2023 Design Development Report [APP-358] - section 5.5.2-5.2.4
Consultation	The parish council stand by our previous submission and the latest proposals have made significant adjustments in Writtle and the comments still stand.	Noted, the Applicant responded to all pre-application consultation in 5.1 Consultation Report [APP-066] .
Landscape and visual	Proposed overhead line alignment The proposed route breaches the following Holford Rules: - Rule 3 – “No sharp changes in direction”. To the South West of Writtle there is a sharp change in direction (nearly 90 degrees) leaving Writtle surrounded very closely on two sides with 50 metre pylons. - North of Writtle the pylons come in from the North East so this beautiful ancient village is thus surrounded on 3 sides by 50 metre pylons. - Rule 4 and 5 – <i>“Choose tree and hill backgrounds in preference to sky backgrounds”, and “Prefer moderately open valleys with woods where the apparent height of towers will be reduced,</i>	The Applicant recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, including within Writtle Parish. The Applicant disagrees that the Holford Rules¹⁰ have not been considered. This is evidenced by document 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, the Design Development Report (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 Design Development Report for the Project [APP-358]), the DDR published for the 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all of which set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground to the west of Chelmsford and Writtle rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Perceptions of being encircled / surrounded when viewing the Project on maps can be very different from the actual local context. Separation is inevitably reduced in certain locations due to the presence of constraints to routeing and environmental features. The

and views of the line will be broken by trees”.

The area to the North, West and South of Writtle, and Chelmsford, is completely open and on a plateau, i.e. the western landscape is higher than the village of Writtle and the City of Chelmsford. The route of the pylons is about 20 meters higher than Writtle and Chelmsford – so the effect is that the pylons will look to be 70 meters high. Additionally, when travelling East from Ongar on the A414, the view looking toward Writtle and Chelmsford will be obscured by pylons. The highest building in Chelmsford is Melbourne Flats and this is clearly visible from all around the West of Chelmsford. The pylons are taller than Melbourne Flats, and the Flats are located lower down in the valley of the three rivers that congregate at Chelmsford.

Writtle is situated in the valleys of the Rivers Wid and Can. Using the main intention of Rule 4 the West of Writtle is absolutely the wrong area to place 50 meter pylons. · Rule 6 – “*In country which is flat and sparsely planted...avoid a*

Applicant notes that the angle taken to the south-west of Writtle is approximately 135 degrees, rather than 90 degrees.

Please see response above in relation to adherence to the Holford Rules, including routeing over higher ground, perceived sense of the parish being surrounded.

The Applicant notes the concern about the visual impact of the Project on the area around Writtle, including concerns about topographical changes, landform and landcover, and the nature of existing views. The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance) and is presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. As set out in Table A13.1.9 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, recognition of the value of views was determined with reference to a number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan. This was carried through to the judgement of sensitivity in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]**.

Neighbourhood Plans were also given consideration, as noted on page 102 of document **5.6 Planning Statement [APP-085]**.

Views from Writtle are represented by Viewpoint 6.07 and Viewpoint 6.19 as set out in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 4 of 4 [APP-232]**. Significant effects are identified on Viewpoint 6.07 which is located to the south of Writtle, with the assessment noting that the Project would ‘*be visible on the skyline to the south-west and the lower portions of the pylons would likely be screened by layers of intervening vegetation.*’ The assessment also notes that vegetation and landform to the north and north-west would ‘*screen much of the pylons in views to the north-west*’, reducing the perception of encirclement in this location. Significant effects are identified on Viewpoint 6.19 Victoria Road, West of Writtle, with the assessment noting the ‘*proposed overhead line would be visible on the skyline above existing vegetation... while lower parts of the pylons would be filtered by vegetation.*’

With regards to Holford Rule 6, there are no existing overhead lines in the vicinity of Writtle which would contribute to a ‘wirescape’ when seen in combination with the Project, although the Applicant notes that there are existing wood pole lines in the area and these may appear in views together. However these would not constitute a ‘wirescape’ in this location.

concentration or ‘wirescape’” In addition to the comments stated in Rules 4 and 5 there are rural and green space corridors around Writtle specifically designated to restrict urban sprawl around the village and Parish due to its special significance to the area.

This will be raised later, but Writtle is an ancient village, and when Chelmsford didn’t exist Writtle appeared in the Domesday Book. In the Writtle Neighbourhood Development Plan (page 42) the following points are made: o The main built-up area of the Parish falls within the Writtle Farmland Plateau Landscape Character Area. This describes Writtle as being separated from Chelmsford by the floodplains of the Rivers Can and Wid, and that away from the main roads, there is a sense of tranquillity. The Church Spire within Writtle is noted as a visible landmark across the farmland plateau.

Effects on landscape receptors within Writtle Parish are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228]** under Landscape Character Area (LCA) B1 Central Essex Farmland in paragraphs 13.3.654 to 13.3.678 and LCA D2 Brentwood Hills in paragraphs 13.3.736 to 13.3.754. Significant effects are identified within approximately 1.5 km of the Project. Construction impacts on landscape features including farmland, hedgerows and woodland, and perceptual qualities including tranquillity are considered within these assessments. Within LCA B1 Central Essex Farmland, the assessment notes there *would be disturbance to the ‘tranquil’ character of the LCA close to the construction activity’*. LCA D2 Brentwood Hills notes that although a *‘number of ancient woodlands are near the Project..’* these would be *‘protected during construction and would not be directly affected’*. Both assessments note that landscape features impacted during construction would be reinstated, including field boundary hedgerows.

Through the approach taken to routeing and siting, the Applicant has sought to reduce (as far as practicable) the potential impacts on landscape. EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. As reported in **5.6 Planning Statement [APP-085]** embedded mitigation has sought to minimise landscape effects as far as practicable.

The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that *‘virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape’* and paragraph 5.10.13, that *‘all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites’*. For CNP infrastructure, *‘the need case will outweigh the residual effects in all but the most exceptional cases’*(paragraph 4.1.7 of NPS EN-1 (2024)).

Transport and Traffic

Concerns are expressed in relation to disturbing the sense of tranquillity through increased traffic, the potential increased pressure on minor roads and

The Applicant sets out the proposed construction routeing strategy in section 5.4 of **7.3 Outline Construction Traffic Management Plan (Revision B)**. The construction vehicle routing strategy has been designed to minimise impacts across the highway network including minor roads and lanes.

lanes, and the visual intrusion of any new development.

Two Primary Access Routes (PARs) are proposed in Writtle as shown on Figure 1 page 26 of 30 in **7.11 Transport Assessment - Appendix I – Figures [APP-342]**:

- The A1060 Rainsford Road / A1060 Roxwell Road (PAR 51) between the A1016 at Chelmsford and Vicarage Road
- The A414 Greenbury Way / A414 Ongar Road (PAR 53) between the A1114 at Widford and the site access point west of Little Oxney Green.

As noted in **7.11 Transport Assessment Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**, the Applicant is proposing an additional 27 HGV movements in the AM and PM peak hours for a peak duration of one week on the A1060 Rainsford Road / A1060 Roxwell Road (PAR 51). During the worst case daily peak construction activity, there would be a daily total of 380 vehicle movements, consisting of 324 HGV movements as detailed within Table A16.4.1 in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Image A16.4.51 presents the construction vehicles daily trip distribution for PAR 51 across the construction programme.

On the A414 Greenbury Way / A414 Ongar Road (PAR 53) the Applicant is proposing during the peak construction period (one week) an increase of 28 HGV movements in the AM and PM peak hours along this section of road. During this peak construction period, there would be a daily total of 392 vehicle movements, consisting of 332 HGV movements as detailed within Table A16.4.1 in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Image A16.4.51 in the same document presents the construction vehicle daily trip distribution for PAR 53 across the construction programme.

6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse-riding on amenity, severance and fear and intimidation along the Primary Access Routes located on the Local Road Network. The Applicant has assessed the significance of residual construction effects on the A1060 Rainsford Road / A1060 Roxwell Road (PAR 51) and A414 Greenbury Way / A414 Ongar Road (PAR 53).

As detailed within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**, it was found that there would be no significant effects as a result of the Project on the A414 Greenbury Way / A414 Ongar Road (PAR 53) when taking account general mitigation set out within **7.3 Outline**

Construction Traffic Management Plan (Revision B). For the A1060 Rainsford Road / A1060 Roxwell Road (PAR 51), it was found that there would be a large adverse significance of effect on driver/public transport passenger delay and Amenity. Mitigation to minimise the impact of the Project is set out within section 5.9 of **7.3 Outline Construction Traffic Management Plan (Revision B).** This includes a driver information pack which will identify locations where pedestrians may be walking in the road or in the verge, and ensuring adjacent vegetation is maintained to provide sufficient visibility and space for walkers to utilise if needed.

7.11 Transport Assessment [APP-333] submitted with the Development Consent Order (DCO) application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts. Junction modelling undertaken along the A1060 Rainsford Road / A1060 Roxwell Road (PAR 51) and the A414 Greenbury Way / A414 Ongar Road (PAR 53) is detailed in Section 7.11 of **7.11 Transport Assessment [APP-333]**.

Cow Watering Lane is not proposed to be a PAR. However, the Applicant is proposing to route a small number of construction vehicles down Newney Green, to unload the scaffolding required into the fields. The proposed works on Newney Green are detailed in **2.5 Access, Rights of Way and Public Rights of Navigation Plans Section F (Sheet 8) [App – 030]**. Sections of Newney Green will have a temporary closure to safely unload the delivery vehicle. A small vehicle will then use the entrance identified by the red line boundary on Cow Watering Lane to construct the scaffold. The Applicant is and will continue to liaise with ARU Writtle on this proposed access.

With the exception of the works required on Newney Green, construction HGVs are not expected to route along minor roads in Writtle and therefore are not expected to put increased pressure on minor roads in the area. There are a number of short-term temporary diversions identified in the area, however, where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.

Effects on tranquillity are considered within the effects on landscape receptors in Writtle Parish, set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** under B1 Central Essex Farmland Landscape Character Area (LCA) in paragraphs 13.3.654 to 13.3.678, G2 Chelmsford and Environs

LCA in paragraphs 13.3.718 to 13.3.735 and D2 Brentwood Hills LCA in paragraphs 13.3.736 to 13.3.756. For example, the assessment for LCA B1 Central Essex Farmland states that the construction effects would disturb the tranquil character of the LCA, as well as disturb the narrow, winding lanes and the Protected Lane between pylons TB165 and TB166. Construction is assessed as having a significant adverse effect on all the landscapes within Writtle parish.

An assessment on construction noise, including construction traffic, is presented in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-271]**. The assessment has no identified any potential significant adverse in Writtle.

Please see responses above and below on the visual effects of the Project in Writtle parish.

Historic environment

And additionally, “Anciently, this area was part of Writtle Forest, a medieval hunting forest. Substantial pockets of woodland survive, as does the historic settlement pattern of dispersed villages focussed on greens and commons, ...” · Rule 7 – “.....and when pleasant residential and recreational land intervenes..... go carefully into the comparative costs of the undergrounding”. Writtle has many reasons for special consideration: 1. A Roman settlement, currently being excavated. 2. Writtle is the location where the first commercial radio broadcast was made – which ultimately became the BBC. 3. Hylands House

Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Writtle Parish. The Applicant acknowledges that the settings of some designated assets within Writtle Parish fall partially within the Order Limits and this is assessed within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]**. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The Project has also assessed the level of harm on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits.

The Applicant has reviewed the assessment of Hylands Park considering the Writtle Parish Council’s comments. The Applicant acknowledges that the Project would be located c.800 m to the west of the asset at its closest point. The Applicant concedes that the agricultural land to the west of the asset could be interpreted as an element of the asset’s setting, however, the Applicant is confident that the setting of the asset does not extend over 800 m beyond its western limits and beyond Margaretting Road. Furthermore, the western boundary of the park is defined by a thick tree belt and copse excluding views in and out of the park, indicating that the design was concerned with creating a sense of privacy and enclosure. The Applicant is therefore satisfied with the assessment

which is the crown jewel of the Chelmsford area and part of the Writtle Parish – the pylons will destroy the westerly sight line from Hylands Park. 4.

undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.

Effects on visual receptors in Writtle Parish are set out under Visual Receptor Area (VRA) VRA F6 Chelmsford North-West (paragraphs 13.9.63 to 13.9.74) VRA F7 Roxwell (paragraphs 13.9.75 to 13.9.86), VRA F8 Writtle and Chelmsford West (paragraphs 13.9.87 to 13.9.98) and VRA F10 Hylands Park (paragraphs 13.9.11 to 13.9.122) in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]**. Visual effects resulting from the project within Hylands Park are reported as not significant during construction and operation (and maintenance). Viewpoint 6.26 Hylands Park, near Hylands House is representative of views to the north and west from Hyland Park from within Writtle Parish, and is presented on page 121 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]**. Visual effects are reported as negligible and not significant effects on visual receptors at this location noting that ‘the Project would be barely perceptible from this viewpoint within heavily filtered views.’

Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact.

This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17

		provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
Landscape and Visual	The Writtle Neighbourhood Development Plan identifies landscape views both into and out of Writtle which are highly valued by the community through in depth public consultation. The Pylon proposal has given no consideration to this at all and it is doubted whether the Neighbourhood Plan has even been consulted. The impact of the proposed electricity line from Norwich to Tilbury on Writtle, Essex	The Applicant notes that there are a number of protected views in and around Writtle as identified in the Writtle Neighbourhood Development Plan. Key views are shown in Figure 3 – CA1, Figure 5 – CA2 and Figure 6 – CA3 in the Writtle Design Guide, which is referenced within the Neighbourhood Plan. Neighbourhood Plans were given consideration, as noted on page 102 of document 5.6 Planning Statement [APP-085]. As set out in Table A13.1.9 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], recognition of the value of views was determined with reference to a number of factors, including whether it was recorded as being of importance in a Neighbourhood Plan. This was carried through to the judgement of sensitivity in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. Viewpoints 6.07, 6.19 and 6.23 are representative of views from Writtle and are assessed in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Part 4 [APP-232]. It is acknowledged that Viewpoint 6.19 is located adjacent to Viewpoint 10 identified in the Neighbourhood Plan, however this has not been identified within the sensitivity judgement for this viewpoint, which is in error. This will be amended within the next iteration of 8.1 Errata List . The value of views would increase to regional / local value from local / community value, however this is unlikely to change the outcome of the sensitivity judgement and the significance of effect would remain significant from this viewpoint. The LVIA viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The locations of all viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066]. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. These are presented in 7.12 Visualisations [APP-343 - APP-349]. In addition, there are a further 47 viewpoints and

accompanying visualisations that support the historic environment assessment. These are presented in the **7.12 Visualisations [APP-350 - APP-351]**.

Transport and
Traffic

Highways Impact

There are two major highways which run from East to West through the parish of Writtle: A1060 from Chelmsford to Leaden Roding and beyond A414 from Widford to Ongar, to M11 and beyond In addition there are a number of secondary roads which cross the proposed pylons line: Cow Watering Lane Victoria Road Newney Green Road Highwood Road Nathan's Lane Margaretting Road All of these public highways are affected by the proposed location of the overhead cables and pylons etc. Not only will the visual impact of the lines of pylons from passing traffic be severe, but during the proposed construction period of four years plus, disruption to traffic flows on all of these public highways will be significant. It is evident that at the crossings with the A1060, with the A414, and with Nathan's Lane/ Margaretting Road, wider easements than those of the general line will need to be created to accommodate construction

The Applicant sets out the proposed construction routing strategy in 5.4 of **7.3 Outline Construction Traffic Management Plan (Revision B)**. Construction traffic will follow the construction routing strategy in the CTMP. The Primary Access Routes have been reviewed to facilitate two-way HGV movements and a number of highway mitigation measures have been proposed on the existing highway network to facilitate construction vehicle access to the construction corridor.

From the site access points, traffic will be routed off the public highway along haul roads to access the construction sites. Crossover points will be constructed in locations where haul roads cross the public highway. Crossover points are not proposed for construction HGVs to transition to or from the public highway (except in emergency or contingency situations).

A summary of the proposals for / impacts on the highways noted during construction is as follows:

- **A1060 from Chelmsford to Leaden Roding and beyond:** A section of the A1060 Rainsford Road / A1060 Roxwell Road (PAR 51) will be used by construction vehicles between the A1016 at Chelmsford and Vicarage Road. As noted in **7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**, a net increase of 27 HGV movements are expected along this PAR in the AM and PM peak hours during the peak construction period (duration of one week). During the same peak construction period, there would be a total of 380 vehicle movements, including 324 HGV movements as detailed within Table A16.4.1 in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Image A16.4.51 presents the construction vehicle daily trip distribution for PAR 51 across the construction programme. **Sheet 5 and 6 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section F [APP-318]** displays the identified highway mitigation proposals in this area. No highway mitigation works are identified for this Primary Access Route. Table 5.7 in the **7.3 Outline Construction Traffic Management Plan (Revision B)** states that adjacent vegetation will be maintained along this route to achieve the relevant visibility requirements. Short-term temporary road closures and associated diversions along sections of the A1060 are set out in Schedule 8 to the **3.1 Draft Development Consent Order (Revision C)** and Sheet

infrastructures. Between these construction infrastructures it is also noted that a construction access road is to be built from the A1060 to the south east of Margaretting Road. This can be seen from the Highways in Writtle impact map (Appendix 2) (the areas of direct impact are identified by orange circles on the map).

- 7 of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]** associated with the construction of temporary bellmouths. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.
- **A414 from Widford to Ongar, to M11 and beyond:** A section of the A414 Greenbury Way / A414 Ongar Road is proposed to be used as a Primary Access Route (PAR 53) between the A1114 at Widford and the site access point west of Little Oxney Green. As noted in **7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**, a net increase of 28 HGVs are expected along this PAR during the peak construction period of one week during the AM and PM peak hours. During the same peak construction period, there would be a total of 392 vehicle movements, including 332 HGV movements as detailed within Table A16.4.1 in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Image A16.4.51 in the same document presents the construction vehicles daily trip distribution for PAR 53 across the construction programme. **Sheet 7 and 8 of 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section F [APP-318]** displays the identified highway mitigation proposals in this area. No highway mitigation proposals are identified for this Primary Access Route. A short-term temporary road closure and associated diversion on the A414 is set out Schedule 8 to the **3.1 Draft Development Consent Order (Revision C)** and Sheet 8 of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]** associated with the construction of temporary bellmouths. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.
 - **Cow Watering Lane:** Cow Watering Lane is not proposed to be a Primary Access Route. However, the Applicant is proposing to route a small number of construction vehicles down Cow Watering Lane, to unload the scaffolding required into the fields. The proposed works on Cow Watering Lane are detailed in **2.5 Access, Rights of Way and Public Rights of Navigation Plans Section F (Sheet 8) [APP – 030]**. Sections of the street will have a temporary closure (both managed and closed), to safely unload the delivery vehicle. A small vehicle will then use the

entrance identified on the red line boundary to construct the scaffold. **Victoria Road:** Victoria Road is not proposed to be used as a Primary Access Route and therefore construction vehicles are not expected to route along here.

- **Newney Green:** Newney Green is not proposed to be used as a Primary Access Route and therefore construction vehicles are not expected to route along here. A short-term temporary road closure and associated diversion of Newney Green is set out in Schedule 8 to the **3.1 Draft Development Consent Order (Revision C)** and Sheet 8 of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]**. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.
- **Highwood Road/The Causeway:** Highwood Road/The Causeway is not proposed to be used as a Primary Access Route and therefore construction vehicles are not expected to route along here. A short-term temporary road closure and associated diversion of Highwood Road/The Causeway is set out in Schedule 8 to the **3.1 Draft Development Consent Order (Revision C)** and Plan E of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]** associated with the construction of temporary bellmouths for crossover points. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.
- **Nathan's Lane:** Nathan's Lane is not proposed to be used as a Primary Access Route and therefore construction vehicles are not expected to route along here. A short-term temporary road closure and associated diversion of Nathan's Lane is set out in Schedule 8 to the **3.1 Draft Development Consent Order (Revision C)** and Plan E of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]**. associated with the construction of temporary bellmouths for crossover points. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.
- **Margaretting Road:** Margaretting Road is not proposed to be used as a Primary Access Route and therefore construction vehicles are not expected to route along here. Margaretting Road is identified as a diversion route for temporary, short-term

road closures in the area. This is shown on and Plan E of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]**.

The construction routeing strategy has been designed to minimise impacts across the highway network as set out within **7.3 Outline Construction Traffic Management Plan (Revision B)**.

The Applicant has undertaken a complete and full assessment of traffic routes to be used by construction vehicles.

7.11 Transport Assessment [APP-333] submitted with the Development Consent Order (DCO) application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Two junctions in Writtle Parish have been modelled within **7.11 Transport Assessment [APP-333]**. The results from the modelling of the A1060 Roxwell Road / Lordship Road roundabout (Site 69) and A414 Greenbury Way / Highwood Road roundabout (Site 71) indicate that there is no predicted change in the junction performance as a result of the Project. Site 69 operates already at or over capacity in the future year AM and PM peak scenarios and Site 71 currently operates at capacity in the AM peak hour.

The Applicant is proposing to monitor the performance of both junctions during construction and will discuss any additional mitigation with the Local Highway Authority, where appropriate.

6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and impact on walking, cycling and horse-riding on severance, amenity and fear and intimidation along the Primary Access Routes located in the Local Road Network. The assessment identified large adverse significant effects on the A1060 Rainsford Road / A1060 Roxwell (PAR 51) for driver and public transport passenger delay and pedestrian, cyclist and horse-rider amenity. Mitigation measures have been proposed to reduce the significance of any residual effects, as detailed in **7.3 Outline Construction Traffic Management Plan (Revision B)**. The proposed mitigation includes provision of a driver information pack, identifying locations where pedestrians may be walking in the verge, and ensuring the adjacent vegetation is maintained to achieve the relevant visibility requirements.

Transport and Traffic	No construction traffic should be allowed within the village	The Applicant has set out its proposed construction routeing strategy in section 5.4 of 7.3 Outline Construction Traffic Management Plan (Revision B) . The prescribed Primary

	envelope nor should any use at any time be made of Cow Watering Lane, Victoria Road, Newney Green Road, Highwood Road, Nathan's Lane. Any access to Margaretting Road should only be from the south and the A12. As such construction traffic should be restricted totally to the A1060 and the A414 along Greenbury Way.	Access Routes in this area are along the A1060 (PAR 51) and along the A414 (PAR 53). Margaretting Road, Victoria Road, Newney Green Road, Highwood Road and Nathan's Lane are not proposed to be Primary Access Routes, and are not expected to received high volumes of construction traffic. Construction HGVs not following the construction routing strategy is defined as a matter of non-compliance in 7.3 Outline Construction Traffic Management Plan (Revision B), and will be subject to the enforcement procedure detailed in Section 6.4. The Applicant is proposing to route a small number of construction vehicles down Cow Watering Lane, to unload the scaffolding required into the fields. The proposed works on Cow Watering Lane are detailed in 2.5 Access, Rights of Way and Public Rights of Navigation Plans Section F (Sheet 8) [App – 030]. Sections of the street will have a temporary closure (both managed and closed), to safely unload the delivery vehicle. A small vehicle will then use the entrance identified on the red line boundary to construct the scaffold.
Transport and Traffic	Essex County Council carried out a Chelmsford Protected Lane study in September 2009, the study was on behalf of Chelmsford Borough Council. Nathans Lane was identified as being one of only two lanes in the area that met the criteria for Protected Lane status. It is designated as such in the Plan. The Writtle Design Guide 2020 notes other important Green Lanes, including Coldhall Lane connecting to Margaretting Road to the South of Southwood's Farm. Please see map below extracted from the Writtle Neighbourhood Plan. It marks the location of the Green Lanes. The alignment proposed would	The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. Further details on the impact of the Project on protected lanes can be found in Environmental statement (ES) Chapter 11: Historic Environment (Document Reference 6.11) and ES Chapter 13: Landscape and Visual (Document Reference 6.13). It is noted that the Chelmsford Protected Lanes Study identified Nathans Lane and Newney Green as lanes which meet the threshold for Protected Lane Status (source: Writtle Neighbourhood Plan). Both Nathan's Lane and Newney Green are not proposed as Primary Access Routes and therefore will not be used by construction traffic. Both roads will be subject to temporary, short-term closures during construction. Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. The extent of the temporary closures and associated diversions are set out in Schedule 8 to the 3.1 Draft Development Consent Order (Revision C) and Sheet 8/Plan E of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]. 7.2 Code of Construction Practice (Revision C) measure H06 details that where practicable, the Applicant will maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impact to each

	adversely affect these lanes particularly as it crosses over Nathans Lane, Newney Green and Coldhall Lane. The proposed route is therefore unacceptable.	Protected Lane (Essex) and Historic Land (Suffolk) within the order limits, where likely to be affected by physical works.
Transport and Traffic	Footpaths and Bridleways The statutory consultation documents indicates that 5 no. Footpath (nos. 18, 23, 68, 85, and 86) are affected by the proposed route of the electricity line. The Footpaths in Writtle impact map (appendix 3) shows the areas of conflict to be significantly more than that with at least 7 no. Rights of way impacted. In the vicinity north of Cow Watering Lane and Newney Green Road, together with Little Oxney Green, the impact is clearly identified to be to a multiple of footpaths. It is proposed that, if the erection of the line goes ahead, a significant number of footpaths will require rerouting, at least on a temporary basis. In the period of construction, the footpaths and bridleways which are impacted will have to be closed with either a temporary rerouting or closure throughout the four year plus term. Given the	The Applicant notes the concern regarding Public Right of Way (PRoW) impacts in Writtle. Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of PRoWs. The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. With specific reference to the PRoWs listed, the Applicant notes that some of the routes identified by the Parish Council are not affected by the Project. The impacts, management proposals and indicative durations for each affected PRoW are contained in 7.6 Outline Public Rights of Way Management Plan [APP-329], and the PRoWs impacted by the Project in the Writtle area are illustrated in Sheet 8 and 9 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]. Of the PRoWs noted, Writtle Footpaths 18 and 86 lie wholly outside of the DCO Order Limits and are therefore unaffected by the Project. In addition, while Writtle Footpaths 23 and 85 enter the Order Limits, they are not directly affected by the construction of the Project and will therefore remain open on their existing alignments. Within the Parish of Writtle, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], Writtle Footpaths 13, 64, 66, 69 and 83, Byway 97 and Bridleway 8 are affected and will remain open on their existing alignments, with access managed in line with 7.6 Outline PRoW Management Plan [APP-329]. Where these PRoW interact with working areas appropriate safety measures will be implemented to allow continued safe passage for PRoW users. Sections of Writtle Footpaths 66, 68, 69 and 83 will also require temporary closures, with localised diversions provided around the perimeter of working areas. Further details for each affected PRoW are provided in the 7.6 Outline Public Rights of Way Management Plan [APP-329].

volume of path affected this will have a significant impact on users. Walking, Cycling, Golf courses, Riding and Riding Schools The above analysis has highlighted where traffic will be impacted. Clearly this applies not just to vehicular traffic on the primary routes as well as the secondary roads but affects cyclists. The proposals for the long-term reinstatement of all public highways will apply to cycling. However in the short term, during the four year plus construction period, any temporary arrangements which are made to the major highways by National Grid may be applied to cyclists but this is unlikely to be the case for the secondary roads. At worst they may be closed, at best they may be rerouted in some way. It is clear that, in an area so popular with the cycling fraternity (and which is prominent in the national cycle highways system), the impact for the four year period will be severe, in the long term may be considerable also. The Hylands golf complex is currently undergoing major refurbishment and thus temporarily closed to members and public (as per the

Detailed arrangements for each location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRow Management Plan. All PRowS temporarily affected by the works will be reinstated as soon as practicable to their original alignment and condition to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.

The Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRow management arrangements are developed.

An assessment of the residual effects on delay to users of PRowS within Writtle Parish can be found within in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. Where temporary closures with diversions are proposed (Footpath 66, 68, 69 and 83) an assessment of residual effects on delay is presented within Table A16.4.3 of **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. It was concluded that no significant impact of delay to PRow users is expected once the measures defined in **7.6 Outline Public Rights of Way Management Plan [APP-329]** are applied.

It is anticipated that roads would only be temporarily closed where this is required for safe working. As noted in Section 5.8 of the **7.3 Outline Construction Traffic Management Plan (Revision B)**, where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads.

Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. In Writtle, the temporary closures requiring diversion are expected to be of a short-term duration of no more than four weeks. Local Highway Authorities will be informed through the Permit Schemes, of all traffic management measures in place on the public highway, including road closures. It is anticipated that this information will be publicly available on the Project website and the relevant Local Highway Authority website. It is anticipated that the local residents will be informed of the commencement and likely duration of the construction activities through a letter drop/email notification. It is anticipated that this will be tailored to a specific area, reflect the works to be carried out and the duration of works.

Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations of recreational assets and recreational routes. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** presents an assessment on the potential impacts on recreational assets and recreational routes. As

	Hylands Golf Club www.hylands-gc.co.uk). The golf complex will be directly impacted by the proposed pylons line. The route is scheduled to be close to the ARU Writtle equestrian facility, passing immediately to its west with the location of the proposed construction access road. There may well be an impact on the facility itself. The bridleway from this facility towards the college and the village should not be impacted. Riding routes, however to the north and west will be impacted. ARU Writtle have submitted a robust response to the proposals which we fully support	part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on receptors. These include: traffic management, signage and routeing measures. These are identified within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], 7.2 Outline Code of Construction Practice (Revision C), 7.3 Outline Construction Traffic Management Plan (Revision B) and 7.6 Outline Public Rights of Way Management Plan [APP-329]. No significant adverse effects have been identified for business premises or tourism assets receptors located within Writtle Parish Council, except for Essex International Jamboree.
Historic environment	Heritage Assets and Impacts Writtle is one of the most historic villages in Essex with a high level of historic buildings, from Grade 11, 11*, 1 as well as a scheduled Ancient Monument, The barn at King John's Hunting Palace ARU, formerly Writtle College. Additionally, there are those that are now statutorily protected as non-designated heritage assets, where it is essential that both the historic buildings themselves, but also	6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within Writtle Parish. The Applicant acknowledges that the settings of some designated and non-designated assets within Writtle Parish fall partially within the Order Limits and this is assessed within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm on designated assets in 6.11.A7

their settings are protected. Whilst a large number of the listed buildings lie within the centre of the village and the Conservation Area, there are many historic buildings within all categories that lie on the edge of the village settlement. These to the north, west and south of the Parish will be seriously affected by the route of the proposed pylons, the associated wires, infrastructure and construction development, albeit the latter is short term, the impact of this with the removal of the historic landscape, will cause harm to the significance of these heritage assets.

Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits.

The Applicant has reviewed the assessment of the Writtle Parish historic environment considering the Parish Council's comments. The Writtle conservation area and its listed buildings were not assessed because of the insular nature of its setting created by the surrounding later development of the settlement. The many non-designated historic buildings referred to by the Parish Council have not been assessed as all of Writtle is located outside the 250 m study area for non-designated assets. The Project study areas are defined in **6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]**, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS 068]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.

Where non-designated historic buildings have been identified within the 250m study area they have been assessed and the Applicant is confident in the results of the assessments presented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**, and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**.

Paragraph 7.2.57 of **5.6 Planning Statement [APP-085]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to

achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact.

This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.

Historic environment

Below we have highlighted some examples of where the greatest impact will be, although it is stressed that both the line of these pylons and the pylons themselves when erected is of significant scale and will substantially alter the historic landscape generally. From Pylon No 157 near Pengy Mill, to the north of the Roxwell Road (A1060) to No. 175 on the Margaretting Road to the south of Southwood's Farm, west of Hylands Park, the route of structures and associated haul roads will have a significant impact on the historic landscape that is characterised by ancient woodlands, hedgerows, ponds, streams and fields that are an intrinsic part of the setting to these heritage assets Listed Building examples include the

Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. **5.15 Design Development Report [APP-122]** provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. **5.15 Design Development Report [APP-122]** addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.

The Applicant acknowledges that the settings of some designated assets within Writtle Parish fall partially within the Order Limits and this is assessed within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]**. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The Project has also assessed the level of harm on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated**

Grade 11 listed Southwood's Farm and its group of listed barns which forms an important part of the gateway to the village, where the estate comprised around 500 acres to encompass part of Hylands Park. An excerpt from the proposal map shows the proximity of the pylon 173 to the dwelling that faces west at just over 200m away. Importantly the construction zone is extremely close and removes the natural environment that forms the context of this listed farmhouse and barn group to the south that are also listed.

The Setting of Heritage Assets
Historic Environment Good Practice Advice in Planning Note 3 gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to their setting. On this latter point, although some change has occurred over time, as expected, this has not been substantial, but it has generally been minor. The significance of this proposal

Heritage Assets [APP-215] where land that forms part of the setting of these assets falls within the Order Limits.

The Applicant has reviewed the assessment of Southwoods and its associated Granary and Cart Lodge and Barn considering the Parish Council's comments. These assets are located on the eastern flank of Margaretting Road c. 240 to 290 m south-east of the nearest pylon (TB175). As the former farming complex has now been converted in to residential properties, its relationship with the surrounding agricultural landscape has diminished as has its cohesion as a farmstead. The Project is, therefore, considered to be at the limit of the assets' setting and so the Applicant is satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation (and maintenance) phase) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070])** and Lower Less Than Substantial Harm (during the operation (and maintenance) phase) **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])** for Southwoods and a permanent moderate adverse significance of effect (during the operation (and maintenance) phase) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070])** and Mid Less Than Substantial Harm (during the operation (and maintenance) phase) **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])** Granary and Cart Lodge and Barn are proportionate and appropriate.

The Applicant has reviewed the assessment of Sturgeons House considering the Parish Council's comments. The asset is located 170 m north-west of Cow Watering Lane, c. 200 m west of the Order Limits. Due to the development of the extensive Writtle University College Equine Centre and associated paddocks to the west and south the asset's relationship with the surrounding agricultural landscape has been eroded. The Project is, therefore, considered to be at the limit of the asset's setting, and so the Applicant is satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation (and maintenance) phase) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070])** and Lower Less Than Substantial Harm (during the operation (and maintenance) phase) **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])** is proportionate and appropriate.

is that heritage assets will be compromised by the unsympathetic development of the pylons and associated infrastructure affecting its setting by being on higher land, dissecting fields and the historic woodland nearby for example King Wood. The Pylons are of such a scale that it will affect the ability to appreciate the assets that frequently form such a group. Another example is of impact on heritage assets is at Sturgeons House which is Grade II listed, the adjacent barns non designated heritage assets, where Pylons no 163/4 will be on this land and will alter its landscape significantly and permanently. The surrounding farmland some of which is farmed by the ARU Writtle forms part of the setting as illustrated in the excerpt from the proposal plan below, the rear of the listed dwelling has an outlook to the north west across the valley containing the brook, looking directly towards the pylon no 163 located on higher ground, less than 300m away. The line of the pylons and associated infrastructure will seriously impact on the views of the listed

The Applicant has reviewed the assessment of Newney Hall considering the Parish Council's comments. The asset is located on the southern flank of an un-named road c. 330 m west of the nearest pylon (TB166). The asset is set within a complex of outbuildings and there are mature tree lined hedgerows that partially screen the Project. Applicant is, therefore, satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation (and maintenance) phase) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070])** and Lower Less Than Substantial Harm (during the operation (and maintenance) phase) **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])** is proportionate and appropriate.

The Applicant has reviewed the assessment of Moor Hall considering the Parish Council's comments. The asset is located in a very rural location c. 810 m west of the nearest pylon (TB167). The asset partially screened from the Project by mature trees in its grounds and by mature tree lined hedgerows in the intervening landscape. Applicant is, therefore, satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (during the operation (and maintenance) phase) **(6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070])** and Lower Less Than Substantial Harm (during the operation (and maintenance) phase) **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])** is proportionate and appropriate.

The Applicant has reviewed the assessment of Hickerage considering the Parish Council's comments. The asset is located on the southern flank of Old Roxwell Road, c. 670 m east of the nearest pylon (TB163). The asset is situated in large grounds with scattered mature trees and defined by mature, tree lined hedges. Due to overall distance, and screening by topography, mature tree lined boundaries, and development in the intervening landscape, the assessment concluded that the setting of the asset does not extend to the Order Limits. The Applicant is confident that this assessment as presented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]** is proportionate and appropriate.

With regard to the non-designated historic building mentioned in the Parish Council's comment, namely, Prospect Cottages, Range Cottage, Gable Cottages, and Montpeliers Farm, a setting assessment of these low value asset was not carried out in accordance with the agreed assessment methodology.

dwelling and its garden, as experienced from the footpath and the road leading to Newney Green.

Similarly adversely affected is nearby Grade 11 listed Newney Hall by the large area of development around pylons 163/164. To a lesser extent, but still impacted would be the Grade 11* listed Moor Hall at Newney Green, with its historic moat, where the route to the east is only about 400m away. Hylands Park Grade II* houses and Grade II* registered Historic Park on the National Heritage List lying to the east of this group plays an important role in the Parish, Chelmsford City and County of Essex. The views from the parkland will be adversely affected by the line of pylons proposed, due to scale, materials and design, where these are proposed to the west of the Park which is accessed by footpaths and permissive paths. Range Cottage and Prospect Cottages at Little Oxney Green are the non-designated heritage assets that lie very close to the line of the pylons the former

All non-designated heritage assets were assessed to determine their value in accordance with the **6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In National Policy Statement (NPS) EN-1 (2024), instructions regarding the Applicant's assessment state (paragraph 5.9.9) 'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refer to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1 (2024)) regarding assessment of impacts to non-designated heritage assets.

being only about 140m from the proposed Pylon 167 with No 166 slightly further away, on the northern side of the A414. These structures will be overpowering and despoiling the view, set out below where the landscape apart from minor road alignments has not altered greatly over time. The photographs on the following page provide evidence of the current agrarian views from the two heritage assets on the local list, where the siting of both pylons is on higher ground than these cottages.

Nearby heritage assets to Southwood's Farmhouse and barns include the row of Gable Cottages Margaretting Road, where the line of the proposed pylons will be clearly experienced from the rear of this historic row of Brick cottages dating back to the early 19th century. Other heritage assets similarly impacted on by the Pylons and associated infrastructure include Montpelier's Farm impacted on by Pylons 171 and 172, where in regard to the latter a particularly large area of land will be

	permanently altered. The farmhouse dates to the 16th and 17th centuries. The fragmentary remains of the moat are also regarded as important assets. Closer to the west and located a short distance from the where the pylons/wires cross the A1060 is the listed building, The Hickerage (an education centre) located on lower ground than the 50m pylons that straddle the highway.	
Biodiversity, ecology and nature conservation	Impact on Biodiversity The Parish of Writtle is nature rich in wildlife nesting and feeding in its farmland, ancient native woodlands, hedgerows, ponds and reservoirs. Along the pylon route you will see herds of Deer, many species of Bats, Newts and other Amphibians, Butterflies, Moths and Bees and many protected species including Badgers, Hares and Otters have been sighted recently. As well as a high proportion of nesting and migrating birds that are on the British Trust for Ornithology (BTO) Endangered Lists. Including Cuckoo, Fieldfare, House Sparrow, Lapwing, Mistle Thrush, Skylark, House Martin,	Ecological surveys have been undertaken to inform the Environmental Statement (ES), including further surveys up to November 2025. The results of these surveys were submitted to PINS in November 2025, no further ecological surveys are due to be undertaken. All ecological survey results are presented and impacts assessed within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on ecology in and around the Parish of Writtle. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors including habitats (woodlands, hedgerows, waterbodies), bats, birds, amphibians, reptiles, terrestrial invertebrates, otter, hares, and badger. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period within the Parish of Writtle, including habitat, badger, bat, otter and water vole surveys. The findings of which have informed the design and approach to mitigation. Details and results of these surveys are detailed in 6.8.A15 ES Appendix 8.15: Badger Report [AS-043], 6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034], and 6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039].

Starling, Grey Wagtail, Avocet, Sparrowhawk, Wren, Song thrush and various species of Owls. Other birds frequently seen along the pylon route and the farm fields include Buzzards, Kestrels and other birds of prey, denoting a very healthy habitat. The last survey of birds around the new reservoir identified Avocet, Great Crested Grebe, Osprey, Oystercatcher and Red Kite. According to National Grid more ecological surveys have been planned for this year and the Writtle PC will not know the outcome until the final Environmental Statement is published. Referenced in the documentation that wintering bird surveys for farmland birds was not deemed necessary. However, the reservoir at ARU Writtle is associated with farmland and birds are seen on both the farmland and the reservoir in the winter and a number of farmland birds are listed on the BTO Red list. Due to the nature rich environment the Parish council would certainly endorse the requirement for further Independent ecological surveys.

Any necessary mitigation measures and commitments are set out within the **7.2 Outline Code of Construction Practice (Revision C)** and **7.4 Outline Landscape and Ecological Management Plan (Revision D)**.

Mitigation measures for ecological receptors where potential impact pathways have been identified associated with construction activities (traffic movements, noise, vibration and air pollution) are detailed in the **7.2 Outline Code of Construction Practice (Revision C)**. The **7.2 Outline Code of Construction Practice (Revision C)** includes measures to avoid contamination of any ponds, brooks, streams, reservoirs and rivers. No significant residual effects are anticipated on any ecological receptors after mitigation measures have been implemented.

The Project passes predominantly through farmland, and due to its linear and narrow nature, with impacts on birds largely localised and temporary. Species recorded locally, including farmland and migratory birds such as Skylark, Lapwing, House Sparrow, Starling, Song thrush, Yellow wagtail, Cuckoo and Fieldfare, as well as birds of prey such as Buzzard, Kestrel and Sparrowhawk, may experience short-term disturbance during construction. The wider connected, surrounding habitat will remain available throughout the construction phase. All temporarily affected farmland will be reinstated following construction, restoring foraging and nesting opportunities in line with **Section 7.4 of the Outline Landscape and Ecological Management Plan (Revision D)**. The ARU Writtle reservoir will be avoided, ensuring no direct impacts on wintering or breeding water-associated species such as Avocet, Great Crested Grebe, Oystercatcher, Osprey and Red Kite.

Badger surveys have identified a range of active and inactive badger setts around Writtle. Measures have been taken to avoid or minimise impacts on main badger setts where practicable, through careful routeing of the 400 kV overhead line. Where it has not been possible to completely avoid, mitigation measures have been proposed as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. A draft badger licence has been prepared and submitted to Natural England, which sets out the anticipated impact and proposed mitigation. The Applicant is working with Natural England towards obtaining a Letter of No Impediment for badger and expecting receipt

	The construction of haul roads, lorry movements, noise, vibrations, air pollution will all have an adverse impact on their habitats. What must be avoided and actively safeguarded against is the contamination of any ponds, brooks, streams, reservoirs or the river Wid or Cam. Thus, Pylon foundations and fuel storage should be kept strictly well away. Location of 2 badger setts on the Pylon route – pink and blue circles (see below).	during the examination phase as shown within the 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034].
Biodiversity, ecology and nature conservation	The Parish Council has concerns about the impact of the proposed development on the biodiversity. The amount of vegetation to be removed in order to facilitate the construction is significant. This will have implications for the connectivity of the landscape for wildlife; wildlife corridors will be interrupted causing fragmentation of habitats. Whilst the PIER documentation refers to ‘temporary habitat removal’ there is no detail as to the length of time over which this will occur and how this will be replaced. Reference is also made to retaining habitat connectivity	The Applicant has sought to reduce and minimise the impacts on features of high ecological value including trees, hedgerows and associated wildlife corridors through careful routeing and siting within the Parish of Writtle. The design process has taken account of existing biodiversity and, where practicable, has sought to reduce impacts on areas of ecological sensitivity including protected species and their associated habitats, through avoidance or mitigation. The potential impacts on all ecological receptors are presented within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. The assessment has assumed that while ecological impacts for the majority of the route will be temporary, replacement planting will not be undertaken until the end of the construction period (2031). The potential impact of lighting and noise on ecological receptors, most notably bats, badger and otter, during both construction and operation has been fully assessed within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. There will be no significant residual effects on ecology receptors, as a result of construction or operational lighting following the implementation of mitigation measures. Given the linear nature of the Project, any loss of breeding bird habitat will be highly localised and temporary, and is not anticipated to affect breeding populations beyond the immediate area. Disturbance will be confined to narrow working corridors, with the majority of surrounding habitat remaining intact and available for use by birds. As set out in 6.8

but again with little specific detail. The proposed vegetation removal is theoretically timed to take account of the bird breeding season and to allow the 'natural disposal' of wildlife through phased removal but there is no consideration of the longer term and cumulative impacts on wildlife population through habitat destruction. If vegetation is to be replanted in the future as part of the mitigation, plant material should be of locally sourced material. There are also concerns over the length of working day and associated need for lighting and noise and vibrations from the work will have impacts on wildlife particularly bats. This will be exacerbated by any proposals to work seven days per week with a 24 hour shift pattern on any part of the project. There is evidence of badger activity in the Writtle area, including on ARU Writtle land, further investigation is required on the impact on badger setts which are protected under the Protection of Badgers Act 1992. More detail should be provided as to how the 10%

Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] the reinstatement of affected habitats (outlined in **7.4 Outline Landscape and Ecological Management Plan (Revision D)**), following construction will restore breeding and foraging opportunities, and is therefore considered sufficient mitigation to address potential impacts on breeding bird populations.

7.4 Outline Landscape and Ecological Management Plan (Revision D) and **7.2 Outline Code of Construction Practice (Revision C)** contain a list of relevant good practice and mitigation measures to avoid or reduce impacts on valuable habitats and protected species. On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. All replacement planting will use native species of local provenance. Indicative species list has been provided at **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**.

In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability. Full details are presented within **7.1 Biodiversity Net Gain Report [APP-299]**.

Badger surveys have identified a range of active and inactive badger setts around Writtle. Measures have been taken to avoid or minimise impacts on main badger setts where practicable, through careful routeing of the 400 kV overhead line. Where it has not been possible to completely avoid, mitigation measures have been proposed as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. A draft badger licence has been prepared and submitted to Natural England, which sets out the anticipated impact and proposed mitigation. The Applicant is working with Natural England towards obtaining a Letter of No Impediment for badger and expecting receipt during the examination phase as shown within the **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**.

	biodiversity net gain is to be achieved by the project.	
Landscape and visual	Impact upon the Landscape The PEIR documentation states that the assessment of landscape visual impact is still ongoing, but it does note that the landscape of Section F is an 'undulating plateau dissected by numerous river valleys'. The Parish Council has concerns about the significant visual impact both during construction and in the longer term, particularly towards the north of the parish where the land rises meaning that the pylons would have even greater visual impact within the landscape. The landscape is very open with little woodland so the pylons would be seen from a distance. Writtle hosted a pylon awareness public footpath walk to demonstrate their impact on the native hedgerows and trees. Photographs were taken of the pylon line The photograph below shows the pylon TB171 on Montpelier farm in what we call the Pond Field. This hedgerow comprises all native species of Hawthorn, Blackthorn, Field Maple, Dog	The Applicant notes the concerns from Writtle Parish Council and the reference to the PEIR (Preliminary Environmental Impact Assessment). We would direct the parish council to the finalised assessment of effects presented in the Landscape and Visual Impact Assessment (LVIA), which is set out in 6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]. The Applicant also notes the concerns relating to vegetation loss. Volume 6 - Environmental Statement is based on an assumed worse case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 162 to 177 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. As noted in previous points, the effects on landscape receptors in Writtle Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under B1 Central Essex Farmland Landscape Character Area (LCA) in paragraphs 13.3.654 to 13.3.678, G2 Chelmsford and Environs LCA in paragraphs 13.3.718 to 13.3.735 and D2 Brentwood Hills LCA in paragraphs 13.3.736 to 13.3.756. The topography of the landscape within Writtle parish is gently undulating, dissected by small valleys and streams. There are stronger ridges and hills in the south, within LCA D2 Brentwood Hills. Although the land rises in the north of the parish from the River Can and its tributaries, it is not at a higher elevation than the wider plateau landscape it is part of. Viewpoint 6.23 NCN Route 1 / PRoW near Writtle College (Writtle 19) lies within the north of the parish and is assessed on page 113 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]. This sets out that the Project would be visible on the skyline above existing hedgerows and vegetation, and is assessed as having a moderate and significant (adverse) effect at construction and operation (and maintenance). Viewpoint 6.5 Centenary Circle, north-west of Chelmsford lies just to the north of Writtle parish, assessed on page 64 of the above document. The effect from this viewpoint is assessed as moderate-major and significant (adverse) at construction and operation (and maintenance).

	Rose, Hazel and Oak and is typical of the local landscape. TB171 and hedge line identified in above map and photograph. The tape shown is 200m long, and this does not cover the whole length of the hedgerow which is affected. The development phase will decimate the local landscape irreparably. It is calculated from the plans provided by National Grid that the length of the line through the Parish is approx. 6.8 km. The average width of the construction area throughout the length at each pylon is 170 m. this does not take into consideration the construction access roads etc. The total land are consumed by the construction area is approx. 115 ha. (285 acres) – the size of two and a half golf courses or 200 football pitches. The disruption to the parish will be immense over the four years of construction.	Effects on visual receptors in Writtle Parish are set out under Visual Receptor Area (VRA) VRA F6 Chelmsford North-West (paragraphs 13.9.63 to 13.9.74) VRA F7 Roxwell (paragraphs 13.9.75 to 13.9.86), VRA F8 Writtle and Chelmsford West (paragraphs 13.9.87 to 13.9.98) and VRA F10 Hylands Park (paragraphs 13.9.11 to 13.9.122) in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment – Part 1 of 4 [APP-229]. Viewpoint 6.09 The Causeway, Edney Common is the closest representative viewpoint to pylon TB171, presented on page 75 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]. The assessment concludes there would be moderate-major and significant (adverse) effects during construction and operation (and maintenance). As reported in 5.6 Planning Statement [APP-085] Embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that ‘<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>’ and paragraph 5.10.13, that ‘<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>’. For CNP infrastructure, ‘<i>the need case will outweigh the residual effects in all but the most exceptional cases</i>’ (paragraph 4.1.7 of NPS EN-1 (2024)).
Land use	Impact on Farming Community Writtle is surrounded by prime agricultural land. The route of the pylons in Writtle parish runs through farmed land in its	The assessment of impacts on best and most versatile (BMV) land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land

	entirety. The Parish council has received the following submission from one of the farmers whose property and livelihood will be severely affected throughout the construction period and thereafter. S J Upton Farms' submission is included as Appendix 4..	Classification (ALC) surveys, of the extent of each land grade within Writtle Parish (Grade 3a with smaller extents of Grade 2 and Grade 3b land). Soil management measures to be implemented during construction across the Project, including across Writtle Parish, to protect the soil resource, are detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner.
Historic Environment	Conflict with relevant Policy Documents Clearly none of the proposal documents produced, assess the impact of the proposal on the heritage assets in the Parish where they neither respond to the historic settlement pattern where the design and materials do not respond to the character of the local built environment of heritage importance, as identified in the adopted Writtle Neighbourhood Development Plan Appendix 5) and the associated AECOM Writtle Design Guide (Appendix 6) both of which are freely available and form part of Chelmsford City Council's Local Plan to which all development has to have regard and are attached. The proposal is therefore contrary to the	6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets, including those in Writtle Parish. The Project will not result in any substantial harm to designated heritage assets. All heritage assets in Writtle were assessed in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Paragraph 7.2.57 of 5.6 Planning Statement [APP-85] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact.

NPPF 2023 Section 6 in that seeks enhancement of heritage assets and their setting. Local Plan Policy S3 states that the Council will place great weight on the preservation or enhancement of designated heritage assets and their setting. The proposal for the pylons does not achieve these objectives, where the fundamental aim of the policy is to secure their preservation of these assets and their settings. Local Plan Policy DM13 Designated Heritage Assets states that the impact of any development proposal on the significance of a designated heritage asset or its setting, and the level of any harm, will be considered against any public benefits arising from the proposed development where there has been no support for the despoilment of the landscape that forms the setting of these assets. The Policy goes on to state that the Council will preserve Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments, where the proposal is completely conflicting to the policy. The

This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Para 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.

adopted Writtle Neighbourhood Development Plan: Policy 2021 NP H1: Conservation Area and Heritage Assets, in respect of both designated and non-designated heritage assets, states that development proposals should protect and where appropriate, enhance such assets which make a significant contribution to the historic fabric of Writtle. The development does not achieve these objectives and furthermore in the instances mentioned would conflict with the general duty as set out in S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which required respect for listed buildings and their setting. Furthermore there should have been an analysis of this impact on the Parish's listed assets which has not been undertaken by the proposers.

Health and Wellbeing

Issues to Health – Mental and Physical The consensus of opinion by those affected by the NG Proposal, in terms of the pylon location and route is that over the forthcoming ten years, the likelihood is that due to their outlook from their properties,

6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]

assesses the impact of the Project on both physical and mental health and wellbeing, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line.

In respect to impacts on mental health and wellbeing through the construction phase, the assessment references various mechanisms by which local residents would be kept informed of activities, including a free telephone hotline, dedicated email address and Project website as well as a public liaison officer working with the Main Works

they are becoming exasperated by prospect of the major impact that the works, through the noise, pollution, commotion, traffic volumes, that their own wellbeing will be affected. (This in addition to the 24/7 stress, devaluation of property values), it will become a vicious circle of events out of their control, with nobody to ease their concerns and betterment. Essex Scouts and Guides The Essex Scouts and Guides are aware of the scheme which cuts right through the middle of the Boyton Cross Jamboree site. The Essex Scouts and Guides are preparing a response on the impact of the proposals on the site.

Contractor(s) to ensure information is communicated in a timely manner to interested parties and affected landowners.

Residents living in closest proximity to construction activities, particularly where construction of the overhead line infrastructure itself is taking place (and therefore effects are of a more permanent duration) may be more vulnerable to change. It is also noted that impacts are likely to be experienced differentially by members of the local community according to factors such as where they live, or their outlook. A range of construction mitigation measures have been identified across environmental disciplines (for example in relation to dust management, working hours or noise pollution) and these are set out in **7.2 Outline Code of Construction Practice (Revision C)**. No significant impacts have been identified in relation to likely health and wellbeing effects during the construction phase.

The Applicant has sought to engage with local communities such as Writtle, to understand potential issues and concerns as they relate to the construction, operation (and maintenance) phases of the Project and to develop mitigation measures to reduce disruption as appropriate. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors, such as residential properties, as far as reasonably practicable. The Project team will continue to engage with people potentially affected as the Project progresses, through regular communication including letters, phone calls and meetings. This enables concerns to be raised and discussed at an early opportunity and provides a regular point of contact to respond to queries and concerns.

The Applicant understands from statutory and non-statutory consultation already undertaken that local residents are also concerned about impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on properties and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated.

The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However,

		property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria. If there are any specific concerns about the devaluation of property National Grid would advise seeking third party advice or alternatively contact the project lands team to discuss: Norwich-Tilbury@fishergerman.co.uk or by calling us on Freephone 0808 175 3314. Alternatively, you can write to Norwich to Tilbury Land Team, Fisher German, The Atrium, Risby Business Park, Newmarket Road, Risby, Bury St Edmunds, IP28 6RD. In regard to the Essex International Jamboree, there have been ongoing discussions between the landowner and the Applicant. The Applicant is looking forward to receiving the latest response from Essex International Jamboree.
N/A	<i>[Appendix 1 – Email complaint from Writtle Parish Council on the shortcomings of the Chelmsford Public Information Event held in April 2024]</i>	During the 2024 statutory consultation 14 public information events were held along the route. This included an event at Chelmsford Racecourse. When deciding on the venues, the Applicant had to consider a range of factors including capacity, accessibility and availability. As this tends to be one of the busier event locations, this venue was deemed most appropriate. If anyone was unable to attend, six public webinars were held along with other digital channels where the same information was available. With regards to the postcode, what was provided on materials was the postcode used by the racecourse itself on its materials. Signage was also placed outside the venue and staff were on hand to help guide people to the venue.
N/A	<i>[Appendix 2 - Highways Impact Map]</i>	The provision of this information is acknowledged. The Applicant has responded to points relating to traffic and transport as raised in the main RR, above.
N/A	<i>[Appendix 3 – Map showing Green Lane – Coldhall Lane]</i>	The provision of this information is acknowledged. The Applicant has responded to points relating to traffic and transport as raised in the main RR, above.
N/A	<i>[Appendix 4 – Submission by S J Upton Farms]</i>	This submission is acknowledged. The Applicant has responded to points relating to affected landowners as raised in the main RR, above.
N/A	<i>[Appendix 5 - adopted Writtle Neighbourhood Development Plan 2020-2036]</i>	The provision of this information is acknowledged. The Applicant has responded to points relating to the Neighbourhood Development Plan as raised in the main RR, above.

N/A	[Appendix 6- AECOM Writtle Design Guide March 2020]	The provision of this information is acknowledged. The Applicant has responded to points relating to the Writtle Design Guide as raised in the main RR, above.

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