

AENC-NG-CNS-REP-0347

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.5.8 Applicant's Response to Issue Specific Hearing 2  
Action Points**

**Final Issue A**

**May 2026**

**Planning Inspectorate Reference: EN020027**

**nationalgrid**

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# 1. About this Document

## 1.1 Introduction

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to action points addressed to the Applicant arising at Issue Specific Hearing 2 (ISH 2) held on 28 April, 29 April and 1 May 2026.
- 1.1.2 The Examining Authority (ExA) issued a list of action points during the hearings and subsequently published the actions from ISH 2 in written form on 7 May 2026 **[EV9-023]**.
- 1.1.3 This document provides responses to those actions, due at Deadline 4, that were specifically addressed to the Applicant.

## 2. Applicant's Response to ISH 2

### 2.1 The Applicant's Response to Actions Table

Table 2.1 Response to ISH 2 Actions

Action No.	ExA Description	Applicant's Response
<b>Day 1 Tuesday 28 April 2026 Agenda Item 4: Noise and Vibration</b>		
01	<b>Percussive/ non-percussive piling</b> Provide examples of the types of ground conditions where percussive piling is needed, and provide an indication of the likelihood of use for this project.	<p>At this stage, specific piling solutions have not been defined and will be determined following detailed geotechnical investigations and subsequent design development. As such, the likely extent of percussive piling cannot be confirmed at present.</p> <p>By way of context, percussive piling (e.g. driven piles) may be required in ground conditions where softer or variable strata overlies denser load-bearing strata, or where high load capacities are needed and alternative methods are not practicable. This can include as examples, made ground, alluvial deposits or soft cohesive soils underlain by competent granular or rock strata. Notwithstanding this, percussive piling is not the Applicant's preferred method of installation, and where feasible, non-percussive techniques (such as bored or augered piles) would be prioritised to minimise noise and vibration effects.</p> <p>The Applicant is seeking statistics from other projects by way of comparison and will provide this information at Deadline 5, however it is important to note that these statistics may not be representative of this Project given potentially different ground conditions.</p>
03	<b>Jasmine Cottage, Bentley Road</b> Provide details of bespoke noise mitigation strategy for Jasmine Cottage. Provide details of how this will be secured.	Specific details of the bespoke noise mitigation strategy (secured by commitment NV24 in <b>7.2 Outline Code of Construction Practice [Revision D]</b> ) would be subject to surveys and detailed design. However, in principle this may include the offer of acoustically rated or/and secondary glazing, together with acoustically rated ventilation such that there is suitable ventilation without the need to open windows (although windows would still be openable at the discretion of the occupant). The glazing and ventilation specification would be selected to

Action No.	ExA Description	Applicant's Response
		<p>achieve suitable internal noise levels as suggested in BS 8233:2014<sup>1</sup>. The offer may also include acoustic fencing (which may be subject to planning permission) to achieve suitable external amenity levels (as BS 8233:2014).</p> <p>Where residual effects remain following the application of best practicable mitigation, affected parties would retain the ability to pursue compensation in accordance with the relevant statutory compensation codes, including where applicable, claims for disturbance or Part 1 compensation under the Land Compensation Act 1973. Any such claims would be considered on their individual merits through the established statutory framework, separate from and in addition to the mitigation measures outlined above.</p>

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**Day 1 Tuesday 28 April 2026 Agenda Item 5: Aviation safety**

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05 (First bullet)	<p><b>Norfolk Gliding Club: Tibenham airfield</b></p> <p>Respond in detail (“line by line”) to the relevant paragraphs of Civil Aviation Authority (CAA) airfield advisory team letter of March 2025 concerning effects on Tibenham airfield.</p>	<p>In reference to the Civil Aviation Authority Airfield Advisory Team’s (CAA AAT’s) March 2025 Position Statement and its consideration of Tibenham aerodrome specifically, this is addressed within <b>8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030]</b> (see paragraphs 3.17.13 to 3.17.15). Furthermore, within <b>8.4.8 Applicant’s Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]</b> (see response to GAAC REP2-050, page 178) and <b>8.9.1 Applicant’s Responses to First Written Questions [REP3-074]</b> (see response to GEN1.20 on page 20) the Applicant makes clear that it considers the Position Statement to remain extant, albeit dated (it has been succeeded by direct engagement with the Operator and the British Gliding Association, as recommended by the CAA AAT) and limited in scope.</p> <p>The AAT Position Statement describes Tibenham aerodrome’s importance as a gliding site. This is acknowledged within <b>6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]</b> (see page 7), as well as <b>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]</b> (see paragraph 15.4.22).</p> <p>The AAT Position Statement raises concerns that the Applicant’s impact assessments are overly focused on glider tow aircraft performance to enable clearance of the Project overhead line on take-off as well as concerns gliders returning to the aerodrome from the west would also</p>
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<sup>1</sup> British Standards Institution (2014) *BS 8233:2014 Guidance on sound insulation and noise reduction for buildings*

Action No.	ExA Description	Applicant's Response
		<p>face clearance challenges. Within <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> the Applicant acknowledges that the impact assessment as summarised within Table A15.2.11 of <b>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [Revision B]</b> does focus on overflight clearances, considering a range of glider and powered aircraft types (including aerotows) as appropriate for the aerodrome, with related conclusions that clearance margins are adequate in terms of safety, including for most impacted Runway 08/26, enabling its use to continue. The Applicant has also assessed and concluded there is sufficient distance from the Project to enable an aerotow to turn in front of it as well as clearance to climb over it, depending on the conditions of the day and the assessment of the pilot in command and that these manoeuvres would not fall outside normal aviation practice for the type of operations at Tibenham.</p> <p>The Applicant notes the International Civil Aviation Organisation (ICAO) plans to implement a modernised Obstacle Limitation Surfaces (OLS) framework to respond to improved aircraft capabilities and the realities of increased development near to aerodromes<sup>2</sup>. The new categorisation of Obstacle Evaluation Surfaces (OES) recognises the need for performance-based evaluation of surfaces where risk can be managed and accepted, consistent with the Applicant's impact assessment methodology and approach. The CAA is currently consulting on the new framework and advising operators of the implications for safeguarding to support readiness, recognising the changes will affect all UK aerodromes<sup>3</sup>. The Applicant suggests the new OLS approach demonstrates the recent and significant development of international and UK safeguarding consideration beyond the AAT position.</p> <p>The AAT Position Statement advises for the impact of multiple variables to be considered, including meteorological conditions (wind vectors, air temperature and air pressure, gross weight of tow aircraft including the pilot and of the glider and pilot being towed). The response offers no advice on how the specified variables can be assessed to inform development of the Project design or Norfolk Gliding Club's own risk evaluation. The Applicant's assessment methodology uses International Standard Atmosphere (ISA) conditions in still wind as a baseline, which is standard practice for obstacle assessment but considers a range of</p>

<sup>2</sup> International Civil Aviation Organisation. *Quick Reference Guide: Obstacle Limitation Surfaces Parameters & Dimensions*. [www.icao.int](http://www.icao.int)

<sup>3</sup> Civil Aviation Authority (2026) *New ICAO Obstacle Limitation Surfaces (OLS)*

Action No.	ExA Description	Applicant's Response
		<p>clearances by aircraft performance group, recognising there may be some variation in clearances achieved due to specific conditions of the day (see paragraph 15.3.37 of <b>6.15.A2 Environmental Statement Appendix 15.2 Review of Aviation Impact [Revision B]</b>). The Applicant's position is that key assessment parameters applied in relation to take-off and approach clearances are conservative and therefore allow for a range of flying conditions. The Applicant has sought further detail on the aerotow flight tests conducted by the Operator to understand the test conditions and parameters (see also page 258 of <b>8.8.1 Applicant's Comments on Written Representations [REP2-209]</b>).</p> <p>The AAT Position Statement raises that gliders returning to Tibenham will face challenges clearing the proposed overhead line for a number of reasons, including variables regarding 'energy management height', a term that is not recognised by the Applicant or apparent within British Gliding Association (BGA) guidance, speed and range from the aerodrome. The position comments that this has the potential to stop competition flying at Tibenham completely, but does not expand on this statement or explain how impacts can be assessed or mitigated. That statement cannot be further tested given the disbandment of the AAT group. The Applicant recognises that BGA guidance<sup>4</sup> in relation to competition flying, advises pilots to allow for error and changing environmental conditions, to ensure compliance with both safety and legal requirements for landing. It is expected that pilots aim to have a reasonable margin above the minimums stipulated in law and competition rules. BGA rules<sup>5</sup> state minimum finish heights set for finish lines along the aerodrome boundary must be at least 30_ft above the surface. The rules further state minimum finish heights set for finish rings (minimum 3_km radius from the airfield reference point) must be at least 300_ft above the reference surface. The consequence of this is that there is potential for competition finishes to be defined by the operator to exceed minimum heights, ensuring a reasonable margin for safe landing, allowing for error and also enabling safe clearance of the overhead line.</p> <p><b>8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [Revision B]</b> and <b>8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision A]</b> demonstrate the Applicant has sought to collaborate with the Operator and the BGA, in addition</p>

<sup>4</sup> British Gliding Association (2026) *Managing Flying Risk – Flying in Gliding Competitions*

<sup>5</sup> British Gliding Association (2022) *Simplified Rules for Regional and Club Competitions*

Action No.	ExA Description	Applicant's Response
		<p>to and in the absence of the CAA AAT. The Applicant recognises the BGA as the UK authority on gliding and are therefore seeking to establish what it would consider to be acceptable overhead line clearances, lowest safe height for aerotow turns after take-off, finish heights for competitions and minimum heights of gliders at aerodrome boundaries on approach, to progress agreement of appropriate parameters and thresholds and enable objective assessment. The Applicant has very recently received some feedback from the BGA in terms of these parameters, which the Applicant is reviewing and intend to discuss further with them, as well as reflect within the next version of the SoCG, to be submitted at Deadline 5. Meanwhile, the Applicant has quantified the extent of potential impacts and concluded design changes to the proposed alignment are not required and cannot be justified by this evidence. Collaboration in relation to the exploration of alternative mitigations has been offered, including support to the Operator's consideration of reasonable changes to operational procedures (during competitions, for example, when modest adjustments to finish heights may reasonably account for the presence of the Project as an obstacle) or implementation of measures to enhance pilot awareness.</p> <p>In summary, further to the AAT Position Statement, the Applicant considers its impact assessment approach to be reasonable and justified and has sought engagement with the Operator and the BGA to further enhance its consideration of site-specific impacts, as advised by the AAT. While the Applicant position remains that existing operations can safely continue, we recognise that mitigation measures to reduce residual risk are potentially available, subject to the Operator's review. No party including the AAT is suggesting that the aerodrome will be required to be closed for safety purposes as a result of the proposals.</p>
5 (second bullet)	<p><b>Norfolk Gliding Club: Tibenham airfield</b></p> <p>Respond to suggestion of risks in pilots turning to avoid the power lines at lower than 300ft and partial engine failure.</p>	<p>Regarding the matter of defining a minimum safe height at which an aircraft or aerotow combination could safely commence a turn to avoid flight in close proximity to or over the Project, the Applicant recognises established aviation practice. Turns degrade aircraft climb performance, with that degradation being proportional to bank angle. Bank angle also affects the aerodynamic stall characteristics of an aircraft. Aircraft height is broadly proportional to the ability to make decisions and manoeuvre, especially if an emergency arises. For all these reasons, significant turns (i.e. a large bank angle for a sustained period) at low height are generally not recommended. The Applicant's methodology limits bank angle to 15 degrees and assumes a minimum turn commencement height of 100 ft (31 m), which is considered to be</p>

Action No.	ExA Description	Applicant's Response
		<p>standard aviation practice (many aerodromes have noise abatement procedures which require similar turns after take-off). The BGA recognises that turn commencement height is 'subjective' (i.e. the decision is made by the pilot in command, based on their assessment of flight progress). The Applicant's methodology includes assessment of the space between the Project and the runway, to verify that a turn could be made, including a lateral safety margin. In the case of Tibenham, the Applicant's assessment indicates that the distance to the Project is sufficient to make a turn to at least parallel the overhead line, if the pilot in command wishes to.</p> <p>Regarding partial power loss in an aircraft or aerotow combination, the Applicant recognises that this is an emergency situation. Established aviation practice recommends limiting aircraft manoeuvres in this case and if an off-aerodrome landing (usually termed a 'forced landing') is required, it is made in an area within 30 degrees left or right of the aircraft's current heading. The likelihood of any aircraft-specific emergency is unaffected by the presence of the Project, although the Applicant recognises that obstacles in the environment can increase the complexity of decision-making and can limit options in the event that a forced landing is required, which can affect the severity of the outcome (and therefore potentially contributes to a rise in risk). The Applicant's assessment methodology considers per-flight exposure to the space in which an aircraft emergency would result in it being unable to fly over the Project safely or land safely in front of it. A reasonable assumption is also made that a pilot would not consciously fly into the Project and would act to manoeuvre away from it as required. In the Applicant's assessment, the increase in risk from the presence of the Project is acceptable, due to the very small probability of an individual aircraft suffering an event which affects ability to climb happening in a place that could result in collision with the Project and that also occurs where a pilot cannot manoeuvre safely away from the Project.</p>
5 (third bullet)	<p><b>Norfolk Gliding Club: Tibenham airfield</b></p> <p>Provide further justification to suggestion of lower height pylons in this location and effects on Tibenham and Priory Farm.</p>	<p>The adoption of low height pylons to the west of Priory Farm and Tibenham airfields was considered within the context of applying the mitigation hierarchy. This consideration concluded that the effects on the aerodromes arising from the standard lattice pylons were not inconsistent with policy and therefore acceptable. Whilst minor infringements of OLS (specifically the Inner Horizontal surface only) have been identified for Tibenham and Priory Farm between RG49 and RG64, these infringements are not considered to affect the continuation of current operations (see Tables A15.2.8 and A15.2.11, and paragraphs 15.4.10 and 15.4.24 of <b>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]</b>).</p>

Action No.	ExA Description	Applicant's Response
		<p>Mitigation suggested to the Operators has included the potential use of marker balls for Priory Farm and changes to competition procedures for Tibenham. The principle of this position is supported by the new ICAO OLS Framework, adopted via amendment to Annex 14 of International Civil Aviation Standards which, when implemented in the UK, is understood will categorise horizontal surfaces as Obstacle Evaluation Surfaces<sup>6</sup> where infringement is manageable, subject to assessment and appropriate mitigation.</p> <p>If the use of low height pylons was considered by others to be an appropriate or necessary response (the Operators have not requested this), there are counterfactors that would weigh in the decision-making process. The Applicant considers that there is no material benefit from a change in pylon type.</p> <p>Other counterfactors most notably include the potential for greater community effects to be experienced by nearby residents (a number of these are present close to the alignment notably along Diss Road, Blackbarns Road, Hall Road, Goose Green and the B1134). These counterfactors arise from the more squat and sturdy appearance of the low height pylons and the wider cross-arm characteristics also have the potential to lead to greater effects on any vegetation, within hedge lines or woodland, that has to be crossed. Given the very small and acceptable change in risk, alternative mitigation available and these counteracting factors, the Applicant does not consider lower height pylons to be appropriate at this location.</p>
5 (fourth bullet)	<p><b>Norfolk Gliding Club: Tibenham airfield</b></p> <p>Provide details of the source of statistics – engine failure, including response to details provided by Mr Curtis of Raydon Wings.</p>	<p>Data to determine the likelihood that an individual aircraft would suffer an emergency which would result in it being unable to climb and therefore fly over the Project safely, are sparse for the type of aircraft considered by the Applicant. The most credible scenario is that an aircraft (including a ‘tug’ aircraft in an aerotow combination) has an engine problem, which affects its climb performance. The Applicant has used a study by the Australian Transport Safety Board<sup>7</sup> (in the absence of an equivalent UK study) which forecasts the likelihood of small aircraft engine failure. This is a relatively recent study and although it is based on Australian data, the type of engines examined (and most of the aircraft they are installed in) are identical to those used in the UK. Mr Curtis offered an alternative figure for engine failure likelihood. The Applicant is familiar with this (higher) likelihood figure, which is commonly available on the internet and often</p>

<sup>6</sup> International Civil Aviation Organisation. Quick Reference Guide: Obstacle Limitation Surfaces Parameters & Dimensions. [www.icao.int](http://www.icao.int)

<sup>7</sup> The Australian Transport Safety Board (2016) Aviation Research Statistics AR-2013-107 – Engine failures and malfunctions in light aeroplanes

Action No.	ExA Description	Applicant's Response
		<p>cited as being based on a US (Federal Aviation Authority) study – the most common source of citation being a US online magazine article. The Applicant's previous research has been unable to verify the original source of this figure and further doubt is cast by other researchers, who also can't find any document in FAA archives or any statement by that regulator to confirm its veracity, origin or derivation. The Applicant will seek to engage further with Mr Curtis to understand the source of this statistic.</p> <p>Notwithstanding this, the Applicant's position is that engine reliability is unaffected by the presence or absence of the Project. Furthermore, the influence of the Project in the context of aircraft emergency is typically only for a small part of an individual flight. The mathematical combination of probabilities that an aircraft suffers an engine event whilst in a space where the Project could affect the outcome of that event gives a very low number (whichever engine reliability data are used) and the incremental risk introduced by the presence of the Project is a fraction of that number. It is this incremental risk that is material to the application for development consent and the Applicant assesses it to be acceptable.</p>
07	<p><b>Maintenance of overhead lines (OHL)</b> Provide a response to the Examining Authority (ExA) question regarding drone and helicopter use for maintenance of the OHL in the vicinity of aerodromes, including a possible requirement to secure any measures if necessary.</p>	<p>Section 4.10 of <b>6.4 Environmental Statement Chapter 4 – Project Description [APP-130]</b> describes the activities that are anticipated during the operational phase including site inspections and route maintenance. As an aviation operator of helicopters and Uncrewed Aircraft Systems (UAS), the Applicant takes the need to safely integrate crewed and uncrewed aerial operations seriously.</p> <p>Specific reference to drones or UAS has already been made within <b>8.4.8 Applicant's Comments on any further information or Submissions Received by Deadline 2 [REP3-070]</b> (see page 170 to 171) which describes the Applicant's deployment of UAS for a range of use cases, primarily condition assessment of existing assets and in support of major construction development. The evidence explains how UAS operations are managed under a single CAA authorisation, Accountable Manager, and Operations Manual, that are in full compliance with UK Regulation (EU) 2019/945 and 2019/947 and CAA guidance (CAP 722<sup>8</sup>).</p> <p>Providing further context to UAS flight planning, Remote Pilots will identify relevant airspace restrictions and any nearby aerodromes outside restricted or controlled airspace. This will be achieved using several sources, including our web-based drone operations management</p>

<sup>8</sup> Civil Aviation Authority (2024) Unmanned Aircraft System Operations in UK Airspace – Policy and Guidance

Action No.	ExA Description	Applicant's Response
		<p>platform, the National Air Traffic Service (NATS) Aeronautical Information Publication (AIP) and the NATS UAS Restrictions Map. In addition, recent satellite imagery of the planned flight area and surrounding vicinity will be reviewed to identify the presence of any aerodromes or landing sites. Where flight restriction zones are identified, the Remote Pilot will contact the appropriate airspace controller to seek the required authorisation prior to operations. For aerodromes located within the vicinity of the planned flight but outside controlled airspace or other airspace restrictions, the Remote Pilot will make effort, through appropriate means, to contact the aerodrome operator. This engagement will be used to discuss the proposed operation, understand local flight activity, and agree a suitable date and time for the drone flight. Where appropriate, this will include contacting the aerodrome immediately before commencement and upon completion of the flight.</p> <p>The deployment of helicopters is broadly similar in that any operation would be subject to appropriate pre-flight planning and assessment of the surrounding airspace environment. For helicopter operations, the pilot would review the proposed work area and route using current aviation information, including aeronautical charts, the UK AIP, Notices to Airmen, known aerodromes, temporary restrictions and any relevant controlled or restricted airspace. The UK AIP is the authoritative source for notified airspace structures and is updated on the Aeronautical Information Regulation and Control cycle.</p> <p>In the UK, airspace is broadly divided into controlled airspace and uncontrolled airspace. Controlled airspace includes Classes A, C, D and E, and is generally associated with major aerodromes, approach/departure routes, and higher-density air traffic areas. Class G is uncontrolled airspace, where aircraft may operate without a specific Air Traffic Control (ATC) clearance, although the pilot remains responsible for safe navigation, separation from other traffic, compliance with the Rules of the Air, and obtaining an air traffic service where appropriate.</p> <p>The classification of the airspace would directly affect how the helicopter operation is conducted. For example, if the work area or route is within or close to controlled airspace, an aerodrome control zone, or another notified restriction, the pilot would contact the relevant ATC unit or aerodrome operator. Where required, the helicopter would not enter that airspace unless the appropriate clearance, permission or coordination had been obtained.</p>

Action No.	ExA Description	Applicant's Response
		<p>Where the work is in Class G uncontrolled airspace, a specific ATC clearance may not be required. However, this does not mean the flight is uncoordinated. The pilot would still assess nearby aerodromes, private strips, gliding sites, microlight activity, parachuting sites, military activity, and other local aviation hazards. The pilot may also request an appropriate air traffic service, monitor relevant frequencies, and make radio calls where beneficial. The UK AIP encourages pilots operating in Class G airspace to obtain an appropriate air traffic service where available.</p> <p>For helicopter overhead line activity, this is particularly important because the aircraft may be operating at lower level, at slower speed, and potentially close to a defined work site rather than simply transiting through an area. The pilot would therefore consider not only whether the route crosses controlled airspace, but also whether the task is near an airspace boundary, beneath controlled airspace, close to an aerodrome circuit, or in an area where local general aviation activity is likely.</p> <p>During the flight, the pilot would continue to manage the airspace risk dynamically by maintaining lookout, monitoring, or communicating on the appropriate radio frequencies, complying with ATC instructions or agreed procedures, and adjusting route, height, timing, or work sequence if required. Where operating close to controlled airspace, suitable lateral and vertical margins would normally be maintained to reduce the risk of inadvertent airspace infringement.</p> <p>In summary, both UAS and helicopter operations are already subject to structured airspace assessment and coordination. The UK airspace classification determines what level of clearance, communication or coordination is required, while the pilot remains responsible for managing the airspace risk before and during the flight in accordance with aviation rules and operational procedures. The Applicant does not consider that additional requirements are necessary and suggests these could confuse established procedures.</p>
08	<p><b>RAF Wattisham mitigation</b> Provide details of outcome of the Defence Infrastructure Organisation assessment and the necessary mitigation required, including how it will be secured</p>	<p>The Applicant and the Defence Infrastructure Organisation (DIO) have updated <b>8.3.39 Draft Statement of Common Ground – Defence Infrastructure Organisation [Revision A]</b> to reflect the conclusions of the Ministry of Defence (MoD) impact assessments. The draft SoCG now recognises that the remaining matter under discussion is mitigation measures necessary to address Project impacts on defence assets (including but not limited to Wattisham Station</p>

Action No.	ExA Description	Applicant's Response
	and the wording of a draft requirement.	<p>aerodrome). See also GEN 1.6 and SS 1.7 within <b>8.4.10 Applicant's Comments on Responses to ExQ1 [Revision A]</b>.</p> <p>The DIO has drafted its requirements, which include removal of the Project overhead line vertical Limits of Deviation (LoD) in three defined locations in the vicinity of the aerodrome to mitigate impacts on the aerodrome's safeguarded Precision Approach Radar navigational aid, as well as its Obstacle Limitation Surfaces (OLS). Having received the impact assessment conclusions and draft requirements on 24 April 2026, the Applicant is currently reviewing these to confirm it is able to accept the associated reduction in flexibility of the Project design, considering known design constraints and the potential for construction challenges. Once confirmed, the Applicant intends to secure the requirements via the most appropriate means, which may be via changes to <b>3.1 Draft Development Consent Order [Revision D]</b>, or as separate commitments. This is currently subject to in-depth consideration by consenting and legal experts.</p> <p>The most significant DIO requirements relate to MoD assessments of Project impacts on the East 2 WAM Network, where Project interfaces with the Network's microwave links have been identified in four locations. In two locations, the assessment conclusion is that links will not be impacted by the interfaces. In one location, the conclusion is that the link could be impacted. In the final location, the conclusion is that the link would be impacted. To mitigate impacts, the DIO requires new Project infrastructure (including pylons, conductors and insulators) to be constructed below specified heights at the two locations where impacts are anticipated. The Applicant is currently reviewing these requirements to confirm whether the design proposals already meet these requirements, or if design changes are necessary. If the latter, the Applicant is determining whether changes within the defined Order Limits are achievable and technically feasible. Subject to the outcome of this design review process, the proposed means of securing the DIO requirements will be confirmed.</p> <p>Furthermore, the DIO has provided detail regarding its known requirement for the timely notification of Project permanent infrastructure changes (including the construction, modification or removal of pylons) to enable accurate navigational charting to mitigate impacts on military aviation (including within Low Flying Areas 5 and 10). Commitment S06 within Table 6.1 of <b>7.2 Outline Code of Construction Practice [Revision D]</b> refers to this and can be further developed if appropriate. More specifically, it has detailed its requirement for a crane/temporal structure deployment management process to ensure direct operator notification of works within</p>

Action No.	ExA Description	Applicant's Response
		<p>the Wattisham Station safeguarding zone to protect aviation operations. This is in addition to the previously anticipated requirement for the Applicant to adhere to Civil Aviation Authority CAP1096<sup>9</sup> procedures beyond the aerodrome safeguarding zone to protect military Low Flying Areas (see SS1.7 on p. 613 of <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>). These three requirements are subject to review and confirmation of the appropriate securing mechanism.</p> <p>The Applicant is working at pace to undertake the reviews as outlined and intends to hold a technical feasibility review meeting with the DIO in May 2026 to share our findings and confirm the proposed methods of securing of requirements. The Applicant remains optimistic the DIO requirements are achievable and anticipates being in a position to further update on the process by the Examining Authority Deadline 5.</p>
09	<p><b>Raydon Wings Airfield</b> Provide a schedule of the interactions between the parties. Continue to progress a Statement of Common Ground (SoCG) in a positive manner.</p>	<p>The latest version of <b>8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [Revision B]</b> has been updated to provide a comprehensive schedule of interactions between the Applicant and the Operator of Raydon Wings to date. Amendments to the SoCG also provide a summary of matters that remain under discussion, as considered by both parties at our most recent meeting held on 16 April 2026. The Applicant notes the Examining Authority's direction that the SoCG should be progressed in a positive manner, and had already recognised the opportunity for further discussion of mitigation measures to address residual impacts associated with the Project's construction and operation, which the Applicant intends to progress by involving construction partners to enable detailed design discussions and in-depth consideration of construction practices.</p> <p>Following the Issue Specific Hearing on 28 April 2026, the Operator has requested a meeting to re-engage on the matter of the Project design decision to locate the overhead line and Cable Sealing End (CSE) compound adjacent to the aerodrome. The Applicant has previously explained its design development rationale, and that the CSE compound siting decision would only be reopened if compelling information were provided to justify re-consideration of the decision. This is reiterated as follows:</p> <p>Paragraphs 5.4.104 to 5.4.110 of <b>7.21 2024 - Design Development Report for the Project [APP-359]</b> explain how Operator feedback to the 2023 non-statutory consultation identified a</p>

<sup>9</sup> Civil Aviation Authority (2021) CAP1096 Guidance to crane users on aviation lighting and notification

Action No.	ExA Description	Applicant's Response
		<p>need to change the 2023 draft alignment to allow continued flight activities from Raydon Wings aerodrome. This was justified by concerns raised by the operator that clearance distances from the overhead line were insufficient for safe operations, and generally supported by impact assessments which recognised distances to be technically sufficient but marginal, with the potential for the proximity of the overhead line to be a visual distraction. Associated alternative sitings for the CSE compound were considered in relation to heritage, landscape, residential, and economical as well as aviation effects, guided by the Horlock Rules, and concluding that the alternative site to the north of Wenham Grove south of the disused railway was preferred.</p> <p>The resulting 2024 draft alignment was subject to statutory consultation, during which a meeting with the Operator took place and their concerns regarding the height and proximity of the preferred overhead line alignment, including the re-located CSE compound, were discussed. The Operator subsequently submitted a written representation to the consultation (see Section 5 of <b>8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [Revision B]</b>).</p> <p>Paragraph 6.1.6 and Figure 6.2 of <b>5.15 Design Development Report [APP-122]</b> describe the consideration of respondent feedback to the statutory consultation in terms of preferences for alternative route proposals and technologies, but notes no new information nor identified further factors were available to inform decision making. The Applicant's aviation impact assessment conclusions did inform decision making. These conclusions included that CAP168<sup>10</sup> Obstacle Limitation Surfaces (OLS) measures are met (with the exception of a minor penetration of the Inner Horizontal Surface (IHS, explained within SS 1.9 of <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>)) and existing circuits can continue to be used safely, including to the north, overflying the overhead line at a safe height from which there would be a range of alternative landing sites in the event of an emergency (see paragraphs 15.4.15 to 15.4.16 of <b>6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [Revision B]</b>). The impact assessment conclusions demonstrated that adverse impacts on aerodrome operations identified for the 2023 draft alignment, had been minimised via the significant changes to the Project design implemented within the 2024 preferred alignment, in accordance with NPS EN-1 (2024) requirements (see paragraph 5.5.50). The design review concluded the alternatives remained less preferred, as whilst reducing effects for a specific</p>

<sup>10</sup> Civil Aviation Authority (2025) CAP168 Licensing of Aerodromes

Action No.	ExA Description	Applicant's Response
		<p>receptor, they would transfer effects to other similar receptors. On this basis, no further change was taken forward.</p> <p>The alternative siting position suggested by the Operator immediately north of the disused railway line requires the extension of underground cabling (at additional cost), does not benefit from screening by existing vegetation and is closer to two Grade II listed buildings. The Applicant considers that the relatively small degree of movement proposed in terms of the CSE compound positioning (approximately 100 m) would not materially alter alleged risk to potential parachuting and aerobatic flying training in its vicinity and has received no evidence to demonstrate this impact and justify further changes. To reiterate, the Applicant's impact assessment concludes that in its proposed location the CSE compound does not infringe the aerodrome's protected surfaces (see page 265 of <b>8.8.1 Applicant's Comments on Written Representations [REP2-029]</b>). The Applicant has sought to establish with the Operator whether changes to existing operational procedures associated with these activities are a reasonable mitigation (in accordance with paragraph 5.5.50 of EN-1 (2024)) but has received no clarity on this matter. Larger northward movement of the CSE compound were considered and addressed in paragraph 6.1.6 of <b>5.15 Design Development Report [APP-122]</b> and remain less preferred. For these reasons, the Applicant's position is that the CSE compound remains appropriately sited.</p> <p>As recognised within Section 4 and Matter 7.7 of <b>8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [Revision B]</b>, during finalisation of the proposed design the Applicant explained its position to the Operator in March 2025, provided detail of its impact assessment calculations (with illustrative technical drawings) in April 2025, offered further explanation regarding its siting decision in May 2025 and July 2025, and requested information to inform its proposals in May, June and July 2025. In the absence of further engagement from the Operator, the Applicant shared its published review of aviation impacts in October 2025 following acceptance of the DCO application and has consistently sought to progress mitigation discussions and the SoCG, despite the Operator position. This is conditional on the re-opening of the CSE compound siting decision. The Applicant's position remains as articulated within <b>8.8.1 Applicant's Comments on Written Representations [REP2-029]</b> (see page 265) that the siting decision would be re-opened if compelling information has become available to justify further design changes. The Operator has not indicated this is the case and has not indicated that flying operations would need to cease as a result of the proposal.</p>

Action No.	ExA Description	Applicant's Response
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**Day 1 Tuesday 28 April 2026 Agenda Item 6: Draft Development Consent Order (DCO)**

10	<p><b>Discharge period</b></p> <p>a) Provide a full response in writing to the local authorities' request to further extend the period for discharge to 40 working days/ 56 calendar days.</p>	<p>The Applicant does not consider that a blanket extension of 40 working days / 56 calendar days is necessary or justified. The draft Order already provides a clear and proportionate mechanism which sets a standard determination period and enables the relevant authority to request further information and/or agree an extended period where necessary.</p> <p>Paragraph 1(1) of Schedule 4 (Discharge of Requirements) to <b>3.1 Draft Development Consent Order [Revision D]</b> provides that the relevant authority must give notice of its decision within 25 business days of receipt of the application (or, where further information is requested, within 25 business days of that further information being supplied), or such longer period as may be agreed in writing between the undertaker and the relevant authority.</p> <p>Paragraph 2 of Schedule 4 to <b>3.1 Draft Development Consent Order [Revision D]</b> provides a structured approach to 'further information' requests, including time limits for the relevant authority to notify the undertaker of any further information required, and restricting the ability to seek further information later unless the undertaker agrees.</p> <p>The Applicant considers that this process already reflects a balance of responsibility between the parties. It is incumbent on the Applicant to submit discharge applications that are properly prepared, supported by the necessary information and of sufficient quality to enable timely determination and it is understood that if this is not the case, there will be a delay in determining the application. Equally, where the relevant authority reasonably considers that further information is required, the Order already contains suitable safeguards, including the ability to request further information and, where justified, to agree a longer determination period. In that way, both parties are appropriately protected.</p> <p>The Applicant is concerned that introducing a default extended period of 40 working days / 56 calendar days would introduce uncertainty to the delivery programme and could undermine timely delivery of the authorised development. This is particularly important given the Project's critical national priority (CNP) status and the need to maintain programme certainty and resilience.</p> <p>The Applicant's experience on other projects is that requests for extensions of time are sometimes received very late in the determination period, which creates avoidable uncertainty and potential delay. The Applicant therefore considers it critical to retain the 25 business day</p>
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Action No.	ExA Description	Applicant's Response
		<p>period (which is the business day equivalent to the 35 days that was considered to be proportionate on the National Grid (Bramford to Twinstead Reinforcement) Order 2024), with extensions agreed only where needed on a case-by-case basis under Schedule 4 paragraph 1(1)(c). The Applicant would also reiterate that as part of consulting with host authorities to discuss ways of working for discharge of requirements, the Applicant has proposed to fund independent resource appointed by the host authorities to assist as the authorities see fit to reduce the resource burden of this project. This approach was successfully implemented on the Hinkley Connection Project.</p> <p>The Applicant refers also to its submissions provided at ISH2, which are summarised in <b>8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [Revision A]</b>.</p>
10	<p><b>Discharge period</b></p> <p>b) Provide a response to the suggestion of a validation checklist being secured in the DCO.</p>	<p>The Applicant agrees that a validation checklist (or similar) identifying the information/documents that must accompany an application for discharge of requirements, akin to the approach used for submissions made under the Town and Country Planning Act 1990 could be helpful. As this would be a validation requirement, it is considered that its drafting would need to be proposed by the host authorities for consideration by the Applicant.</p> <p>However, the Applicant considers that any matters which involve a judgement as to the adequacy or acceptability of the submitted information (as discussed at ISH 2) could reasonably form part of the pre-application discussions and, to the extent that the relevant planning authority considers there to be a shortfall, this should be addressed by the Applicant prior to formal submission. Should the officer consider that further information is required once receiving the submission, this should be addressed after validation.</p> <p>Validation is often carried out by a separate team to the officer that deals with the determination of an application to discharge a requirement and the Applicant is concerned that there could be a delay to the validation of the application should a validation adequacy or acceptability measure be imposed requiring additional consultation between the validation team and the allocated officer. The draft Order already provides an appropriate mechanism for requesting further information following submission of an application. Schedule 4, paragraph 2(1) provides that, where an application has been made, the relevant authority may request such reasonable further information as it considers necessary to enable it to consider the application.</p>

Action No.	ExA Description	Applicant's Response
12	<p><b>Article 5 Vertical limits of deviation (LoD)</b></p> <p>Clarify the areas where these are restricted and how they would be secured, and respond to the National Farmers Union (NFU) question at the hearing regarding this.</p>	<p>Article 5 outlines the vertical LoD with respect to the Project. For the pylons there are defined upward vertical limits but no downward limit as the downward limit would be dictated by the ground conditions and technical foundation requirements of the structure.</p> <p>There are no vertical limits on the conductors and earthwire as these are dictated by the pylon heights which are limited as above and the span between pylons. Minimum ground clearance is limited through technical and health and safety standards and guidance.</p> <p>For the underground cable the Applicant requires a minimum depth of cover to protective tiles of 900 mm within agricultural land. This is a minimum requirement, and cables can be installed deeper where constraints occur such as at utility crossings and under watercourses and ditches. The overall depth of the cable is determined at detailed design as depth impacts the cable rating (capacity) of the cables and needs to be designed at a system level once all constraints are confirmed. Downward limits are imposed by the technical cable system detailed design and are therefore not provided.</p>
13	<p><b>Article 23 Removal of human remains</b></p> <p><b>Suffolk County Council</b> to provide comments on the Applicant's response to ExQ1 DCO 1.28.</p>	<p>The Applicant has responded to this point in response to DCO 1.A28 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>
14	<p><b>Article 29 (Temporary use of land for maintaining the authorised development)</b></p> <p>Applicant to respond in writing to the request raised by NFU regarding notice period for farmers set out in Article 29(3) of 10 business days, suggesting 3 months notice should be provided.</p>	<p>Article 29(3) provides a minimum notice period of 10 business days. This is a business day equivalent of the 14 days' notice period that was considered to be appropriate in the equivalent provision on The National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant will continue to engage with landowners and, where it is in a position to do so, the Applicant will seek to provide notice in excess of the minimum period.</p> <p>The Applicant is required by Article 29(6) to pay compensation to affected landowners and occupiers for loss or damage arising from these powers of temporary use of land for maintaining the authorised development.</p> <p>In the context of this project of Critical National Priority, the Applicant does not consider three months' notice to be proportionate.</p>

Action No.	ExA Description	Applicant's Response
16	<p><b>Schedule 3 - Requirements 1 (Interpretations) Local authorities</b> to comment on the Applicant's response to ExQ1 DCO 1.S5 regarding the discharging authority and the revised wording, including in relation to local government reform as set out in the Devolution and Community Empowerment Bill 2025. Both the <b>Applicant and local authorities</b> to provide further comments on the definition of 'stage'.</p>	<p>For the purposes of Requirement 3, a 'stage' is not intended to be a fixed subdivision of the authorised development by reference to Work Nos., Sections A–H, local authority boundaries, or high-level lifecycle phases. Rather, a stage is intended to be a delivery-led concept linked to a particular package of works to be carried out as part of the construction programme.</p> <p>The Applicant confirms that it is currently working with the Great Grid Partnership, as its delivery partner, to further develop the detailed construction programme and associated stage structure, and has prepared a draft written scheme of stages, which is currently being consulted upon with the host local authorities.</p> <p>This document sets out a proposed division of stages and sub-stages, including their relation to the construction programme, geographic extents and the anticipated sequencing of works.</p> <p>The Applicant considers that retaining flexibility in the definition of 'stage' is necessary to ensure that the staging approach remains aligned with the detailed delivery programme as it evolves, and enables the discharge of requirements to align with the works being undertaken at a given point in the programme, thereby avoiding unnecessary delay or the need for approvals across areas where works are not yet programmed to commence.</p>

### Day 2 Wednesday 29 April 2026 Agenda Item 6: Draft DCO

18	<p><b>Schedule 3 requirement 9: Reinstatement planting plan</b> Provide a response to the ExA question regarding interpretation of what exactly the applicant is proposing as 'mitigation', 'enhancement', 'compensation' or 'biodiversity net gain' (BNG) as separate entities. Signpost to where, in the submitted application documentation, it specifically explains what elements of the proposed development will constitute 'mitigation',</p>	<p><b>6.5 Environmental Statement Chapter 5 - Environmental Impact Assessment Approach and Method [APP-135]</b> paragraphs 5.4.21 to 5.4.31 explain what the Applicant is proposing in terms of mitigation, enhancement and compensation (referred to as offset in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017).</p> <p><b>7.1 Biodiversity Net Gain Report [APP-299]</b> details in Section 3.5 how habitat creation and enhancement on-site will be delivered through replacement planting and within the Environmental Areas. The Environmental Areas are multi-functional areas where landscape mitigation and biodiversity gains can be achieved together. The mitigation planting provided for landscape and visual has therefore been included within the BNG metric. The BNG methodology requires all on-site habitats post-development (i.e. on completion of all works including landscaping), to be inputted into the BNG metric. This post-development metric therefore includes all habitats to be retained, habitats to be improved, habitats to be reinstated and habitats to be created across the Project. The BNG assessment therefore includes all land within the Environmental Areas. The BNG additionality principle also allows for landscape</p>
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Action No.	ExA Description	Applicant's Response
	<p>'enhancement', 'compensation' and 'BNG' and where these different elements are shown in their own right on the submitted plans.</p>	<p>mitigation and habitat mitigation to be included within the BNG calculation. The Project will deliver any biodiversity deficit, in order to achieve 10% net gain, through off-site third-party habitat banks as set out within <b>7.1 Biodiversity Net Gain Report [APP-299]</b>.</p> <p><b>Mitigation</b></p> <p>Mitigation measures proposed as part of the mitigation hierarchy (avoid, prevent, reduce) for the Project relevant to construction and post construction are outlined in <b>7.2 Outline Code of Construction Practice [Revision D]</b>, <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>, <b>7.6 Outline Public Rights of Way (PRoW) Management Plan [Revision B]</b> and <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b>. In terms of being shown on plans, only landscape mitigation, confidential ecological mitigation, traffic and transport mitigation, PRoW mitigation and archaeological mitigation is shown on the following plans:</p> <ul style="list-style-type: none"> <li>• Landscape mitigation is shown on <b>7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]</b></li> <li>• Traffic and transport mitigation is shown on <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Sections A-B [APP-313 – APP-314]</b>, <b>Section C [Revision B]</b>, <b>Sections D-G [APP-316 – APP-319]</b> and <b>Section H [Revision B]</b></li> <li>• PRoW mitigation (diversion routes) are shown on <b>2.5 Access, Rights of Way and Public Rights of Navigation Plans – Sections A – B [APP-033 – APP-034]</b>, <b>Section C [Revision B]</b>, <b>Sections D – G [APP-036 – APP-039]</b> and <b>Section H [Revision B]</b> and management proposals are listed in Table 7.3 of <b>7.6 Outline Public Rights of Way Management Plan [Revision B]</b></li> <li>• Archaeology mitigation is presented on 7.5.F2 Location of Archaeological Mitigation Areas Within Priority Trial Trenching Areas (included in updated <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> to be submitted at Deadline 5)</li> <li>• Environmental mitigation that relates to the permanent assets is detailed in <b>7.2 Outline Code of Construction Practice [Revision D]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>.</li> </ul>

Action No.	ExA Description	Applicant's Response
		<p><b>Compensation</b></p> <p>Compensation proposed as part of the Project comprises the commitment to replace individual trees at a 3:1 ratio with planting prioritised within the Order Limits (but outside the Environmental Areas); off-site provision (outside the Order Limits) is also likely to be required. There are no plans that show this compensation planting.</p> <p><b>Enhancement</b></p> <p>Enhancement proposed as part of the Project comprises:</p> <ul style="list-style-type: none"> <li>• Biodiversity Net Gain (BNG) – the Project is committed to delivering at least 10% BNG – further detail can be found within <b>7.1 Biodiversity Net Gain Report [APP-299]</b> (Note: enhancement relates to the 10% net gain with wider environmental and societal benefits only). Both on-site and off-site BNG are proposed. On-site multi-purpose BNG comprises the landscape mitigation within the Environmental Areas shown on <b>7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]</b>. Off-site BNG will be delivered through the purchase of biodiversity units from commercially registered providers.</li> </ul> <p><b>Furtherance</b></p> <p>Environmental measures contributing towards the natural beauty, special qualities, and key characteristics of Protected Landscapes – further detail can be found in <b>5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]</b>. There are no plans that show the furtherance measures.</p>
19	<p><b>Schedule 4 Discharge of requirements</b></p> <p>The <b>Applicant and local authorities</b> are both to provide a response to the ExA questions and comments including an update by Deadline 5 (Wednesday 10 June) regarding post-discharge functions and the involvement of the Department of Energy Security</p>	<p>As requested, the Applicant will respond to this action at Deadline 5.</p>

Action No.	ExA Description	Applicant's Response
	<p>and Net Zero (DESNZ), following the related submissions at the final deadline of the Sea Link examination. Enquiries are to be made whether DESNZ has been consulted or provided comments regarding the draft wording of the relevant schedule in the Sea Link draft DCO.</p>	
21	<p><b>Consents, licences and other agreements</b> Provide a summarised general update on consents and licences that are being sought.</p>	<p><b>5.5 Consents and Licences Required Under Other Legislation [Revision B]</b> has been updated at Deadline 4 to include a summarised general update on consents and licences that are being sought outside the Development Consent Order.</p>
23	<p><b>BNG and unilateral undertaking/ bilateral agreement</b> Clarify the matter of planning obligations referenced in ExQ1 DCO 1.G4 and DCO 1.S15 are the same document or separate documents. DCO 1.S15 indicates a unilateral undertaking, whilst the document referenced in DCO 1.G4 appears to reference bilateral agreements between appropriate landowners and the relevant planning authorities or responsible bodies (as applicable). Clarify how these documents are to be secured, in terms of their relationship to the DCO, and how</p>	<p>The Applicant is providing one s106 unilateral undertaking which will secure the commitment to provide at least 10% BNG with wider environmental and societal benefits as part of the development. Details of all on-site BNG will be provided via the final LEMP which will include detail on habitat management and monitoring.</p> <p>Off-site BNG would be purchased from registered habitat banks. There is a set process a landowner must go through in order to register a biodiversity gain site. This includes a legal agreement that secures the land for at least 30 years, which is to be in the form of a s106 agreement or a conservation covenant with the Local Planning Authority or responsible body. This is the second agreement that was being referred to, but this registration is the responsibility of the landowner and outside the development consent process. It is the process any landowner seeking to sell biodiversity units would need to go through.</p> <p>It is the legal agreement created between the landowner and local authority/responsible body at the time the gain site is registered, which will secure details of the management and monitoring of the off-site habitats, and the agreement will only be created if the Local Planning Authority or responsible body is satisfied the landowner can meet these obligations.</p>

Action No.	ExA Description	Applicant's Response
	<p>commitments to the management and maintenance of any off-site BNG is to be secured. Note: A request was made by the ExA regarding planning obligations not being submitted too late in the Examination, to allow time for interested parties to comment on these documents.</p>	<p>To clarify, the Applicant will only provide one s106 unilateral undertaking. No other agreement is necessary as this will be part of the process third parties undertake to register their biodiversity gain site. If obligations are not met, enforcement action may be taken. A site cannot be registered as a biodiversity gain site without having the management and monitoring of the site agreed.</p> <p>The Applicant will acquire biodiversity units from these landowners/habitat banks as part of securing the off-site biodiversity units (secured through the s.106 unilateral undertaking) to satisfy its requirement to secure at least 10% BNG with wider environmental and societal benefits.</p> <p>The Examining Authority's request that planning obligations are submitted early enough in the examination to allow time for interested parties to comment, is noted, and the Applicant will work with the stakeholders to meet the request.</p>

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### Day 2 Wednesday 29 April 2026 Agenda Item 8: Landscape and Visual Effects

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24	<p><b>Landscape Institute Technical Guidance Note 02/21</b></p> <p>Further to ExQ1 LV1.21 provide an example where the technical guidance note has had an effect on the proposed route.</p>	<p>As clarified in the Applicant's response to LV1.21 of <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>, the landscape assessment considered Landscape Institute Technical Guidance Note (TGN) 02/21<sup>11</sup> when making judgements of value of landscape receptors. It is important to note that TGN 02/21 links back to guidance set out in the third edition of Guidelines for Landscape and Visual Impact Assessment<sup>12</sup> (GLVIA3). Paragraph 2.3.1 of TGN 02/21 explains '<i>The current guidance for LVIA/LVA is the third edition of Guidelines for Landscape and Visual Impact Assessment [...] which states that the value of a landscape should be assessed as one of two components of landscape sensitivity. Landscape value is the 'inherent' component, which is independent of the development proposal, while the other component, susceptibility, is development specific.</i>'</p> <p>The value judgement factors suggested in TGN 02/21 originate from Box 5.1 of GLVIA3. Whilst not explicitly stated within the documents referenced in response to LV1.21 of <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>, the factors set out in Table A13.1.4 of</p>
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<sup>11</sup> Landscape Institute (2021) Technical Guidance Note 02/21 *Assessing landscape value outside national designations*

<sup>12</sup> Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment. Third edition*

Action No.	ExA Description	Applicant's Response
		<p><b>6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]</b> have positively influenced the proposed route.</p> <p>For example, a change was made between RG48 to RG49 near Cargate Common in Norfolk as set out in Section 4.4 of <b>5.15 Design Development Report [APP-122]</b>. Prior to statutory consultation, routeing in the vicinity of Cargate Common sought to minimise impacts on small-scale historic field patterns and valued natural heritage elements of the landscape. Following statutory consultation, changes were made in response to detailed survey findings and potential impacts on trees to further minimise effects on valued natural heritage features.</p> <p>Another example relates to changes made in the Chelmer Valley in Essex, as set out in Section 9.2 of <b>5.15 Design Development Report [APP-122]</b>. Following statutory consultation, the alignment between TB136 to TB142 in the Chelmer Valley was changed in relation to a number of factors, including to avoid identified veteran trees. This is because these natural heritage features contribute positively to the value of the landscape. Subject to technical confirmation, a change to four low height lattice pylons north of the River Chelmer is proposed to reduce effects in recognition of the cultural heritage value of the landscape in the vicinity of Langleys Registered Park and Garden and Langleys Grade I listed building. Consideration of the value of landscapes is amongst many factors taken into account when making a balanced decision on routeing. For instance, a proposed change to three low height pylons south of the river has not been taken forward in light of the use of two standard pylons, reducing effects on communities by increasing the distance between pylons and a residential property.</p> <p>As such, factors relating to landscape value, which are highlighted by the Technical Guidance note, were taken into consideration in the routeing of the Project, as well as within the Landscape and Visual Impact Assessment.</p>
25	<p><b>Limits of Deviation 1</b></p> <p><b>Local authorities</b> to identify the most sensitive locations and specific viewpoints that they would like to see additional visuals of pylons within the LoD (so as to further illustrate the worst case scenario). The list of viewpoints is</p>	<p>The Applicant is proactively engaging with local authorities to seek to agree a shortlist of the most sensitive locations and viewpoints. The long list below has been provided by local authorities up to and including 11 May. The Applicant is unable to confirm an agreed short list for Deadline 4 due to the limited timeframe and engagement required with the relevant local authorities. The long list below is being reviewed and will be discussed further with local authorities with a view to the Applicant agreeing a proportionate list and submitting corresponding visuals at Deadline 5 (Wednesday 10 June).</p>

Action No.	ExA Description	Applicant's Response
	to be agreed as soon as possible with the Applicant, and submitted by the Applicant at Deadline 4 (Tuesday 12 May). The Applicant is to submit the agreed visuals by Deadline 5 (Wednesday 10 June).	<ul style="list-style-type: none"> <li>• South Norfolk and Broadland District Council: Viewpoint 1.01, Viewpoint 1.04, Viewpoint 1.15, Viewpoint 1.22, HE2a, HE2b and HE21.</li> <li>• Suffolk County Council &amp; Babergh and Mid Suffolk District Council: Viewpoint 2.05, Viewpoint 2.14, Viewpoint 2.16, Viewpoint 2.28, HE3 and HE24.</li> <li>• Essex: Viewpoint 4.21, Viewpoint 7.01, Viewpoint 7.03, Viewpoint 7.09, HE11, HE12, HE26, HE28, HE32, HE37, HE38 and HE42.</li> <li>• Braintree District Council: Residential Visual Amenity Assessment (RVAA) wireline for E7 West Ford Farm Cottage and RVAA wireline for E8 Whiteheads Farm.</li> <li>• Colchester City Council: Viewpoint 4.01, Viewpoint 4.08, Viewpoint 4.11, Viewpoint 4.16, Viewpoint 4.24, Viewpoint 4.37 and Viewpoint 4.38.</li> <li>• Tendring District Council: Viewpoint 3.11, Viewpoint 3.31 and HE25.</li> </ul>
26	<p><b>Limits of Deviation 2</b></p> <p>Applicant to provide a response to the ExA question regarding how the LoD in the project compare to that in the DCO for Bramford to Twinstead project.</p>	<p>The Limits of Deviation (LoD) used for the Bramford to Twinstead and the Norwich to Tilbury Projects are the same save that the vertical LoD that has been assessed and is being sought on Norwich to Tilbury is no greater than an increase of 6 m (equating to two 3 m sectional extensions) see response to DCO 1.A15 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>. This is compared to no greater than a 4 m vertical LoD for Bramford to Twinstead.</p> <p>The difference reflects a need to respond to a more varied terrain, across the 180 km of the Norwich to Tilbury Project. Additional flexibility from the potential to use two 3 m sectional extensions is therefore considered necessary. The Applicant notes that the Yorkshire Green DCO secured a 6 m vertical LoD, the same as that being sought for Norwich to Tilbury. A number of low height pylons at Great Waltham and to the east of Thurrock airfield are noted in <b>3.1 Draft Development Consent Order [Revision D]</b> to have 18 m vertical LoD to respond to potential design scenario outcomes, however, this is subject to review following decision making in relation to those scenarios.</p>
27	<p><b>ExQ LV 1.28 and masterplans</b></p> <p>Masterplans to be provided at the <b>next deadline</b>, with an agreed position in terms of compensation</p>	<p>The Applicant notes this action and is already engaging with the local authorities to provide a response to this request for Deadline 5 as confirmed during ISH2. It has not been possible to provide plans for Deadline 4 due to the limited timeframe and engagement required with the relevant local authorities. The Applicant has set out its position on the policy relating to</p>

Action No.	ExA Description	Applicant's Response
	measures for residual effects on the specified landscapes by Deadline 5 (Wednesday 10 June).	landscape compensation in its response to LV1.28 and at ISH2, and the Applicant's approach to this action will be taken forward in that context.
28	<p><b>Waveney Valley</b></p> <p>Provide more information on the technical reasons for other pylon types being discounted.</p> <p><b>Local authorities</b> to provide further comments in writing in response to the discussion regarding the setting of St Remigius Church.</p>	<p>The Applicant provided its findings regarding the potential use of low height lattice pylons in <b>5.15 Design Development Report [APP-122]</b> in paragraph 4.6.11. This noted that the potential to use low height lattice pylons was restricted to only a very limited number of locations due to their not being compatible with larger changes of direction (angle of direction change having to be less than 30 degrees). This also noted their continued visibility above trees and potential detrimental change for users of recreational routes with potential additional tree removal required due to the greater crossarm width.</p> <p>Similar consequences and limitations occur with respect to T-pylons (which are similarly restricted to 30-degree change of direction) but there are also additional effects, given that the solid monopole structures have a greater degree of visual contrast with the landscape than lattice pylons, especially against a darker backdrop of trees and landform. In contrast the lattice tower structures are more transparent, given the steelwork is relatively slim. In both cases there is little material change in landscape and community effects from height reductions; arguably greater effects due to the contrast in colour and form of T-pylons with both being less consistent with Holford Rule 3 (use fewest possible angle pylons) than standard lattice pylons.</p> <p>The Applicant will submit visualisations of T-pylons at Deadline 5 (Wednesday 10 June). The visualisations will relate to Viewpoint 1.22 and HE2ii to illustrate how T-pylons would appear in views related to the setting of St Remigius Church.</p>
29	<p><b>Dedham Vale 1</b></p> <p>Clarify if the worst case scenario for the permanent visual effects of the link pillars has been assessed and provide details of the assessment. Provide details of the colour of the proposed link pillars and associated fencing.</p>	<p>Link Pillar details are shown in <b>2.6.1 Design and Layout Plans – Subs and Cables [REP1-003]</b>, Drawing Reference AENC-MMAC-ENG-DWG-0085-06. Although detailed system design is required to confirm the number and location of link pillars, it is considered likely that one link pillar per cable trench (group of three cables) will be required as shown within drawing AENC-MMAC-ENG-DWG-0085-6. It is also considered likely that cable section lengths will be similar, resulting in the grouping of joint bays and the associated link pillars, resulting in a maximum of six link pillars at each joint bay grouping.</p>

Action No.	ExA Description	Applicant's Response
		<p>Where practicable the link pillars will be collocated in small compounds with timber post and rail fences. The number and size of the fenced-off areas will depend on the specific location and land use and may be one larger area or more likely two or three smaller areas.</p> <p>The link pillar locations are dependent on the length of the cable sections which can be influenced by the detailed cable system design, the crossing constraints along each section and the access constraints. It is therefore not possible to confirm overall numbers or locations of link pillars until detailed design has been undertaken.</p> <p>Numbers and locations of link pillars are largely decided by the technical requirements of the cable system. However, the requirement for economy and efficiency under licence would limit the number of joints, as longer sections and fewer joints represent the most economic and efficient solution. This is also technically preferred from a maintenance point of view, as joints are more likely to require maintenance than cable sections mid-span. The Applicant's duties to protect the environment (incorporating duties to protect National Landscapes) would further influence the numbers and locations of link pillars.</p> <p>Land use and visual impact are factors in locating link pillars. Where possible, link pillars are located towards the edges of fields when in open country or agricultural land, however, the constraints of the cable system design can restrict the flexibility for micro-siting link pillars.</p> <p>The link pillars are considered in the assessment within <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and accompanying appendices <b>[APP-228 to APP-232 and APP-235]</b>. The landscape and visual assessment related to the underground cables and associated link pillars is based on the description within paragraphs 4.9.13 to 4.9.16 of <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b>.</p> <p>The findings of the landscape and visual assessment are that the introduction of above ground link boxes along the underground cable route would form small components in some views. These would be locally perceptible as relatively discreet features.</p> <p>There is potential for the link pillars themselves and the fencing around them to be coloured in line with <i>Guidance on the Selection and Use of Colour in Development</i><sup>13</sup>. The Applicant will engage with the National Landscape Partnership on colour as the detail design progresses.</p>

<sup>13</sup> Dedham Vale Area of Outstanding Natural Beauty (2018) *Guidance on the Selection and Use of Colour in Development*

Action No.	ExA Description	Applicant's Response
31	<p><b>Burstall and Bramford</b> Respond to request by Mid Suffolk and Babergh DCs and Suffolk County Council for collaborative working with the Bramford to Twinstead project and a strategic landscape response.</p>	<p>The Applicant will work collaboratively with the Bramford to Twinstead Project delivery team to coordinate matters and ensure that timings of the construction works do not conflict.</p>
33	<p><b>Bounds Farmhouse</b> Respond in writing to the interested party regarding their oral submissions in relation to Bounds Farmhouse, Ardleigh.</p>	<p>The Applicant carefully noted the comments made and initially would clarify a few points of fact. In respect of the proposed new EACN Substation, while the land boundary may be only 30 m from the respondent's property, the closest part of the substation site is at around 220 m from the residential property. At this distance, the Applicant does not expect significant noise and vibration effects, but a monitoring protocol is proposed to investigate any effects (secured by Requirement 14 of <b>3.1 Draft Development Consent Order [Revision D]</b>).</p> <p>The intervening land will in part be left as grassland but some will include belts of trees for screening and soil bunds with design arrangements yet to be finalised. Indicative landscape proposals are shown in <b>7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]</b>. The Applicant has also adjusted the positioning of the pylons to the south of the property (TB3 and TB4 are at around 240 m and 280 m respectively and the centreline at around 210 m) and restricted the Order Limits to avoid the trees providing screening to the south of the respondent's property.</p> <p>In terms of visual effects, Bounds Farmhouse is located within Visual Receptor Area (VRA) C13 Little Bromley which is considered in paragraphs 13.6.151 to 13.6.165 of <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]</b>. Significant effects would be experienced up to approximately 1.5 km from the Project, including from the area to the west of the EACN where Bounds Farmhouse is located.</p> <p>The historic environment assessment of the Grade II listed Bounds Farmhouse (1147743) has concluded that, during construction and operation phases, this designated heritage asset will experience a temporary, during construction, and permanent, during operation, moderate adverse significance of effect (<b>6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]</b>) and Mid Less Than Substantial Harm (<b>6.11.A7</b></p>

Action No.	ExA Description	Applicant's Response
		<p><b>Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215]).</b></p> <p>Property values can be affected by a range of factors, making it difficult to identify any single reason why a property might depreciate or be considered unsaleable. The Applicant recognises that the presence of new electricity infrastructure can be a concern for local communities, particularly in terms of visual impact, and the Project has sought to avoid communities and homes wherever possible and to reduce potential effects through careful routeing and design. The Applicant would be happy to engage with the Interested Party's appointed agent. This will enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</p> <p>In instances where land or rights are required for the Project under the Development Consent Order, and a retained property suffers a direct and demonstrable loss as a result of the Project, landowners may be able to claim compensation. In those circumstances, the Project's land agents can provide further advice. The Norwich to Tilbury lands team can be contacted at <a href="mailto:Norwich-Tilbury@fishergerman.co.uk">Norwich-Tilbury@fishergerman.co.uk</a>, and they will be able to advise on whether compensation provisions may apply.</p>
34	<p><b>Colne Valley</b></p> <p>Provide written response to comments made at the hearing, in particular regarding the differing characteristics of the Colne Valley in terms of topography and whether the approach to the selection of the proposed pylon route has varied given these characteristics.</p>	<p>The Applicant notes that alternatives in this location have been considered and reported on in both 2024 and 2025 iterations of the Design Development Report. <b>5.15 Design Development Report [APP-122]</b> reports on an eastern alternative (south from TB41 and then following the valley) at paragraph 7.3.3 but concludes it is not viable due to constraints to the immediate north of Fiddlers Wood. A more western alternative is also addressed in Figure 7.4 and in paragraph 7.3.2 which is potentially viable. In purely landscape and visual terms, this route to the west may be considered preferable, but it is necessary to balance landscape and visual considerations against other potential considerations, notably heritage, and the numbers of residential properties. In this case the western route was less preferred on balance, being slightly longer and having potentially greater heritage effects albeit having potentially reduced landscape and visual effects.</p> <p>The full suite of Holford Rules amongst other factors are used to inform decision making, noting that in practical terms it is not possible to be compliant with all the Holford Rules, and a balance needs to be achieved. These rules take into account the differing characteristics of the landscape, including the topography. In Section D of the Project close to Fordham, Fordstreet,</p>

Action No.	ExA Description	Applicant's Response
		<p>Aldham and the Colne Valley, characteristics and attributes including topography have been taken into account as set out below.</p> <p>In response to Rules 2 and 3, the route aims to follow the most direct route avoiding the use of too many angle towers, whilst avoiding areas of high amenity value, such as the Fordstreet Conservation Area and the listed churches at Fordham and Aldham.</p> <p>In response to Rules 4 and 5, the route selected has had careful regard to the topography of the valley. It follows the slopes of a tributary valley to the north of the Colne Valley, passing to the east of Fordham. In the vicinity of Fordham Place, there is an elevated plateau where longer views towards the surrounding area are experienced. The Project alignment aims to cross this plateau on an oblique angle to the south, utilising the lower areas of the tributary valley to the north-east and south-east of the plateau. The alignment continues to the east of Fordham and avoids the higher areas near the village of Fordham and the lower tributary valley areas where there are blocks of ancient woodland. The alignment passes through an area of community woodland south-east of Fordham, and across Mill Road at a point where the Project is able to avoid the Roman Villa excavation site and potential impacts on buried archaeology. The alignment enters the lower valley area and crosses the River Colne directly on a perpendicular, utilising existing woodland strips to provide some immediate filtering of views near the Essex Way. Routing considerations have included avoiding a natural flood management and wetland scheme to improve flood storage and improve biodiversity to the east of the proposed River Colne crossing. The Project then passes obliquely up the sloping southern valley sides towards Gallows Green aiming to secure a background to the Project (as recommended by Holford Rule 4), before directly crossing the high point near Gallows Green, to seek to minimise the number of towers seen on the ridgeline.</p> <p>It is noted that the eastern and western alternatives discussed above would also cross the Colne Valley, with the western option crossing to the west of Fordstreet.</p> <p>Inherently the attributes of the different alternative routes all influence the balance of factors informing the decision. And in this regard the approach to selection here is different to the approach elsewhere because the evaluation attributes are different. In this case, the Applicant has favoured a slightly more direct option and despite some other preferences being expressed there is no indication that the effects are unacceptable in policy terms. Whilst others may favour</p>

Action No.	ExA Description	Applicant's Response
		<p>a different route this is substantially a transfer of effects to other receptors (homes, heritage assets, etc.) albeit a slightly different balance.</p> <p>Finally at this stage, and bearing in mind the cost and programme implications of change at this stage, it is appropriate to note that the Application should be judged on its merits and against the relevant policy. It does not stand to be judged against the perception by some that one or other alternative is in some way better.</p> <p>In summary, the Colne Valley does not comprise a location where the strong presumption for overhead lines is reversed in line with para 2.9.20 of EN5. Neither is it considered that the effects engage the criteria within paragraph 2.9.23 for widespread significant adverse landscape and visual effects and as such there is no consideration of whether the effects or costs of undergrounding are justified.</p>
35	<p><b>Cumulative effects</b></p> <p>Provide copies of the documents and cumulative photomontages provided to the Five Estuaries and North Falls examinations which indicate the location of Norwich to Tilbury EACN works.</p>	<p>The Applicant has identified the following documents and cumulative photomontages which can be found within the following appendices:</p> <ul style="list-style-type: none"> <li>• Appendix A - <b>10.34.3 VP2 BARN LANE PROW</b>. This is a Five Estuaries Offshore Wind Farm Deadline 5 document. Figure 10.34.3b comprises a photomontage illustrating the proposed Five Estuaries substation together with the Norwich to Tilbury Project.</li> <li>• Appendix B – <b>9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 1 of 2 (Rev 0) and 9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 2 of 2 (Rev 0)</b>. These documents comprise cumulative visualisations of the onshore substation of North Falls Offshore Wind Farm, including the Norwich to Tilbury Pylons wirelines.</li> <li>• Appendix C - <b>Joint Substations Design Guide for North Falls and Five Estuaries offshore wind farms</b>. Figures 8.17 and 8.19 of this document illustrate the Environmental Area for the Norwich to Tilbury EACN together with mitigation areas for North Falls and Five Estuaries.</li> </ul>
36	<p><b>Mitigation</b></p> <p>Respond to the comments made by interested parties regarding</p>	<p>To facilitate the Project there will be vegetation removal required, including the loss of trees and hedgerows. The Applicant has sought to reduce effects on vegetation where possible, for example by clipping the Order Limits and reducing the LoD in some areas, including within Dedham Vale National Landscape. The Environmental Impact Assessment (EIA) assumes the</p>

Action No.	ExA Description	Applicant's Response
	<p>landscape mitigation, including tree and hedge loss.</p>	<p>worst-case vegetation removal/management as shown in <b>2.16 Trees and Hedgerows to be Removed and or Managed Plans - Sections A to H [Revision B]</b>. It is expected that there will be a reduction in vegetation loss in practice, through the careful siting of temporary works and compounds to reduce the impacts on existing vegetation. Commitments in <b>7.2 Outline Code of Construction Practice [Revision D]</b> seek to minimise impacts on existing vegetation.</p> <p>Vegetation which is removed will be reinstated in accordance with <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>. There will be some restrictions on tree planting below the overhead line and directly on top of the underground cables. As set out in commitment B03 of <b>7.2 Outline Code of Construction Practice [Revision D]</b> a Reinstatement Planting Plan will be provided post-consent. The plan will identify where trees, groups of trees, woodlands and hedgerows would be reinstated following completion of construction. The locations for this planting will be identified following detailed design and submitted to the relevant Local Planning Authorities for approval. This post-consent Reinstatement Planting Plan will include a schedule of trees, hedgerows or other plants to be planted, including the number, species, sizes and planting density. Planting sizes and species will be selected based on those which are most likely to successfully establish and naturalise. For example, smaller whips and transplants (typically 2-3 years old) will establish better than larger/older tree stock, which tends not to cope as well with transplanting.</p> <p>Embedded landscape mitigation is proposed within Environmental Areas around the substations, substation extensions and Cable Sealing End (CSE) compounds. These are located on land that is to be retained and managed by the Applicant. Indicative landscape designs have been prepared for the Environmental Areas and are presented in <b>7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]</b>. These landscape proposals take into account the landscape and visual context of the site, as well as the consideration of other proposed development within the local area. For example, the landscape proposals at the EACN substation were developed through collaboration with the North Falls and Five Estuaries projects. A final version of these landscape proposals for the Environmental Areas will be produced following detailed design and submitted as part of the final Landscape and Ecological Management Plan to the Local Planning Authorities for approval.</p> <p>The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within <b>7.4 Outline Landscape and Ecological Management</b></p>

Action No.	ExA Description	Applicant's Response
		<p><b>Plan [REP3-030]</b> which is secured by Requirement 4 within <b>3.1 Draft Development Consent Order [Revision D]</b>. Details of on-site tree planting will be provided in accordance with the final Landscape and Ecological Management Plan (if provided within Environmental Areas) or the Reinstatement Planting Plan secured under a separate requirement of <b>3.1 Draft Development Consent Order [Revision D]</b>. The final LEMP will be approved by the Local Planning Authorities. Further detail on the implementation of the 3:1 replacement planting is provided in response to LV1.1 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>. The Applicant notes there was a point made in the hearing related to availability of tree stock for the 3:1 replacement ratio. Typically, these would be contract grown to an order or multiple orders from plant nurseries in the local area, made 2-3 years in advance. This is therefore not considered to be a concern.</p> <p>The appropriateness of the 3:1 replanting ratio to compensation for veteran trees was raised during the hearing. Outline compensation for veteran trees is provided in Table 5.1 in <b>7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b>. If veteran trees cannot be retained during detailed design, compensation measures would be agreed on a case-by-case basis with landowners and detailed in the final Landscape and Ecological Management Plan to be approved by the Local Planning Authorities under Requirement 4 of <b>3.1 Draft Development Consent Order [Revision D]</b>.</p>

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**Day 2 Wednesday 29 April 2026 Agenda Item 9: Historic Environment**

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38	<p><b>Further historic environment questions</b></p> <p>The ExA are to separately issue a Rule 17 letter to contain the remaining questions not covered in item 9 of the agenda. All parties listed in those questions should provide a response at Deadline 4 (Tuesday 12 May).</p>	<p>The Applicant has responded to this action in <b>8.17 Response to Rule 17 Letter - Historic Environment [Revision A]</b>.</p>
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Action No.	ExA Description	Applicant's Response
<b>Day 3 Friday 1 May Agenda Item 10: Traffic and Transport</b>		
39	<p><b>Diss to Thetford (PARs 8 and 9) Norfolk County Council</b> to provide further comments and an update on discussions.</p>	<p>The Applicant will provide the Diss Access Strategy document to Norfolk County Council in advance of Deadline 5, to assist with discussions.</p>
40	<p><b>Anglia Ruskin University (ARU) Writtle</b> Provide a response to ARU Writtle comments regarding traffic management for horse riders on Cow Watering Lane.</p>	<p>The impact of diversion routes on vulnerable road users will be assessed by the Main Works Contractor as part of the Permit Scheme application. Traffic management measures to mitigate any impacts to vulnerable road users will be developed and agreed with the Local Highways Authorities as part of this process. These could include measures such as temporary controlled crossings, signage or speed management. The Community Liaison Officer will provide relevant traffic management and diversion information in advance of the works to ARU Writtle, in accordance with section 3.3 in <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>.</p>
42	<p><b>Abnormal Indivisible Loads 2</b> Provide updated SoCG with the Joint Forces to include updates on discussions regarding outstanding concerns on certainty and funding mechanisms.</p>	<p>The Applicant has submitted at Deadline 4 updated SoCGs with Essex Police (<b>8.3.3 Draft Statement of Common Ground - Essex Police [Revision C]</b>) and Suffolk Constabulary (<b>8.3.2 Draft Statement of Common Ground - Suffolk Constabulary [Revision C]</b>) to reflect updated positions and discussions regarding outstanding concerns on certainty and funding mechanisms.</p>
43	<p><b>Abnormal Indivisible Loads: cumulative impacts</b> Applicant and local highway authorities to provide in writing an update on cumulative impacts of AIL routing and progress with route assessments, including structural assessment.</p>	<p>As detailed in <b>7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]</b> notifications will be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible.</p> <p>The cumulative impact associated with Abnormal Indivisible Loads (AILs) will be mitigated by the use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system to manage any impact on the operation of the network. AIL movements will be scheduled outside peak traffic periods when baseline traffic is lower on the highway network.</p>

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Modelling at junctions has been undertaken for AM and PM peak hours and therefore does not assess ALLs, as these are assumed to be moved generally during off-peak periods when baseline traffic flows are lower and to minimise impacts.

The Applicant understands there are other NSIPs with works proposed at the same time as Norwich to Tilbury. As detailed within Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision C]**, the Applicant will work with other projects with the aim of coordinating ALL movements where possible to limit the impact on the highway network. The Applicant has also committed, subject to agreeing suitable terms of reference, to joining and engaging in a Developer's Forum to be set up by Essex County Council.

Progress with route assessments, including structural assessment:

The status of the structural assessments as of 1 May 2026 is as follows:

Owner	Missing Information	Structural Assessments required	Structural Assessments Complete	Structural Assessments Outstanding	AiPs Agreed
Thurrock	0	2	2	0	0
Norfolk	0	0	0	0	0
Suffolk	1	6	3	3 (1 because of missing info)	0
Network Rail	1	2	1	1 (missing info)	1
Essex	23 - 9 require information 14 need confirmation of suitability	3	3	Unknown	1

Action No.	ExA Description	Applicant's Response				
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<p>The 23 bridges with missing information may trigger the need for additional Structural Assessments. Records have been provided for 14 of the 23 bridges, however the Applicant is still awaiting confirmation from the LHA if assessments are required. The Applicant is still awaiting record information for 9 of the 23 bridges before it can be confirmed if further surveys are required or if a Structural Assessment is required.</p>					
National Highways	82	Unknown	Unknown	Unknown	0
<p>National Highways has confirmed that getting access to asset records is challenging and rather than agree an AiP in advance would prefer for the contractor to submit their ESDAL once project details are confirmed, e.g. ports of origin, completion of detailed design and sizing of equipment.</p>					

It is worth noting that whilst there are currently a number of structures still to be assessed, at this stage multiple AIL routes from various ports are being considered. This is because the final port selection will be undertaken by the Main Works Contractor and its supply chain. Therefore, some of these AIL routes and their associated structures may not be impacted.

44	<p><b>Joint working with other projects</b></p> <p>Consider widening or replication of the Essex developer forum format for all authorities in the area and also consider the inclusion of relevant parish councils and provide details of how this might work and how it would be secured.</p>	<p>The Applicant has updated Section 6.6 of <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b> to include a commitment to engage with other forums set up and managed by other Local Highway Authorities.</p> <p>The Applicant will engage with the LHAs to understand the suitable forums which could be used to communicate (including the Planning and Infrastructure Working Group (Ardleigh and Little Bromley)) relevant information throughout the construction period. The Applicant will provide an update at Deadline 5.</p> <p>The Applicant will include before the end of examination additional detail on the coordination and collaboration within Section 6.6 in later iterations of <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>, which is secured through Requirement 4 of Schedule 3 of <b>3.1 Draft Development Consent Order [Revision D]</b>.</p>
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45	<p><b>Caps on heavy goods vehicles (HGV)</b></p> <p>Signpost the assessment of this issue in the ExA's</p>	<p>The Applicant has provided a detailed response to the Vehicle Caps within <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>. The Applicant has provided a commitment within <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b> that a</p>
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Action No.	ExA Description	Applicant's Response
	recommendation report on the Bramford to Twinstead project.	<p>delivery management / scheduling system will be implemented, with updated forecast vehicle flows compared against those within the Environmental Statement and Transport Assessment. The management system will enable a three-month look ahead, to review the numbers of expected HGVs. Should there be emerging exceedances compared to the flows assessed in the Environmental Statement and Transport Assessment and National Grid's EnvCoW considers that these would have the potential to introduce materially new or materially different residual effects, the Main Works Contractor(s) will discuss with National Grid and the Local Highway Authorities, and National Highways where appropriate, suitable steps to avoid or mitigate such effects. The Applicant and its appointed Main Works Contractor(s) will develop a monitoring framework, which will include potential mitigations, as part of the final CTMP.</p> <p>The Applicant has adopted similar mitigations for the number of HGV vehicles against those assessed, to those accepted within the Bramford to Twinstead examination (detailed within the Bramford to Twinstead Construction Traffic Management Plan<sup>14</sup>). The Examining Authority on that project was satisfied that the monitoring and compliance within the CTMP would provide a suitable checking process for the highway authorities to identify short-term impacts attributed to actual traffic numbers per access exceeding the assumed worst case. This is detailed in paragraph 3.15.130 of the Examining Authority's Recommendation Report for the Bramford to Twinstead Reinforcement<sup>15</sup>. As summarised in paragraph 3.15.136 of that report, the ExA concluded no reason to recommend a vehicle cap.</p>
46	<p><b>Non-primary access routes (PARs)</b></p> <p>Applicant and Suffolk County Council to discuss the inclusion of non-PARs in the outline construction traffic management plan (CTMP) and the assessment of environmental effects, and</p>	<p>The Applicant notes this action and will liaise with Suffolk County Council and provide a response at Deadline 5.</p>

<sup>14</sup> National Grid (2024) Bramford to Twinstead Reinforcement, 7.6 Construction Traffic Management Plan [REP8-018]

<sup>15</sup> Planning Inspectorate (2024) *Bramford to Twinstead Reinforcement, Recommendation Report*. <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020002-001913-BTTR%20-%20ExA%20Recommendation%20Report.pdf>

Action No.	ExA Description	Applicant's Response
	provide further written comments to summarise the issue and discussions to date.	
47	<p><b>CTMP and Construction Workers Travel Plan (CWTP) (and appendices)</b></p> <p>Assess the use of tailpieces and other non-committal forms of wording in the CTMP and the CWTP to make these as binding and enforceable as possible, and amend as necessary for submission of the next versions of the documents.</p>	<p>The Applicant has reviewed <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b> and revised wording to enable enforceable commitments, submitted at Deadline 4.</p> <p><b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> will be reviewed and updated at Deadline 5.</p>
48	<p><b>Driver's information pack</b></p> <p>Provide detailed information and explanation of the proposed drivers information pack in the outline CTMP so the ExA can be satisfied that the information in the final driver's information pack will be effective.</p>	<p>The driver information pack is an embedded mitigation within <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>. Detailed information on the driver information pack – as set out below – will be added to <b>7.3 Outline Construction Traffic Management Plan</b> at Deadline 5.</p> <p>The Main Works Contractor will undertake the following to ensure that the information in the final driver's information pack will be effective:</p> <ul style="list-style-type: none"> <li>• During tender phases, all supply chain members will receive a copy of the Logistics Direction for the Supply Chain.</li> <li>• During onboarding, supply chain members will have to confirm their adherence to the standard, and attend a logistics specific briefing, which covers the rules, sensitivities, and consequences (for the Project and them) of non-compliance.</li> <li>• Concurrently, a briefing pack will be provided for all supply chain members so they can brief their drivers.</li> </ul>

Action No.	ExA Description	Applicant's Response
		<ul style="list-style-type: none"> <li>• Every PAR will have its own driver information pack. This will outline route to site (to accompany the Vehicle Management Booking System Driver App), and all the rules specific to the site they will be visiting – speed limits, height restrictions, safety areas, etc.)</li> <li>• When there was evidence that drivers were readily failing to follow the rules, they will be 'invited' to attend a training session, and assessment. Failure to attend, or pass the assessment, and the driver will not be permitted back on the Project.</li> <li>• Quarterly supply chain logistics forums will also be held, to discuss change, issues (and ways of working together to resolve them), incidents, and good practice.</li> <li>• Where there is specific information that needs to be provided to a driver on an ad-hoc basis, information will be provided at the site access point.</li> </ul> <p><b>What detail will be included?</b></p> <p>The driver information pack will include:</p> <ul style="list-style-type: none"> <li>• Details of road safety concerns for the PARs (e.g. locations where pedestrians may be crossing the carriageway). This will be supported by additional signage and vegetation clearance in appropriate locations warning pedestrians of additional vehicles (locations detailed in <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b> and <b>7.11 Transport Assessment [APP-333]</b>).</li> <li>• Details of locations where pedestrians could be walking/cycling on the carriageway. This will be supported by additional mitigations at appropriate locations including cutting back the vegetation and maintaining the verges to improve visibility with additional signage and notices on the route.</li> <li>• Details of school routes, where an increase in pedestrians may be noted. This is supported, where deemed necessary, through the re-timing of construction vehicles outside school pick up and drop off times.</li> <li>• Clarification of HGV routes. This will be supported by the delivery management booking system and use of the identifier in the vehicle window.</li> <li>• Speed limit requirements. This will be supported by additional signage on the route and on site for the observed speed limits that the drivers are legally bound to adhere to.</li> </ul>

Action No.	ExA Description	Applicant's Response
		<ul style="list-style-type: none"> <li>• Details of reporting accidents and near misses. This is expected to be undertaken by the Transport Coordinator as part of site checks.</li> <li>• Details of the types of locations it would not be appropriate to park on the local highway network. The Outline CTMP details that HGV drivers parking or waiting on the highway in inappropriate locations which could result in highway issues is a matter of non-compliance.</li> <li>• Details of appropriate lorry parks, services and other designated overnight parking.</li> <li>• Details on any restrictions on delivery hours. This will have the additional mitigation from the booking system/delivery management system which will not schedule deliveries to site outside the agreed delivery hours.</li> <li>• Details of HGV safety standards. This will be additionally mitigated by commitment GG19 in <b>7.2 Code of Construction Practice [Revision D]</b>.</li> <li>• Details of disciplinary measures for non-compliance. This will additionally be supported by the role of the Transport Coordinator whose responsibility is to ensure compliance with the CTMP and escalate all incidents of non-compliance through the non-compliance procedure detailed in Section 6.3 of <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>.</li> <li>• Information on sensitive locations in the local area, such as hospitals, care homes and schools. Where the assessment highlighted mitigation could be required at these locations, additional mitigation, above the driver information pack, has been detailed for the appropriate locations.</li> <li>• A copy of the identifier to display in the vehicle window.</li> </ul> <p><b>What does it look like?</b></p> <p>The driver information pack will be specific to each PAR, to allow targeted information and detailed mitigation measures to be highlighted to the HGV drivers.</p> <p><b>How will it be communicated?</b></p> <p>As well as the measures listed above, the driver information pack will be issued to each driver prior to them arriving on site. The Main Works Contractor(s) will be responsible for briefing all operatives on the specific details within the CTMP prior to the commencement of works.</p>

Action No.	ExA Description	Applicant's Response
		<p><b>How will it be updated?</b></p> <p>The driver information pack will be updated (if required) on a quarterly basis (or sooner, should this be necessary), following the reporting and monitoring cycle, where additional revisions or updates to mitigation are required.</p> <p><b>Is it going to be used every day, by all drivers?</b></p> <p>The driver information pack will be issued to each driver making consistent and regular deliveries to the construction site. In practice, it is not feasible or practicable to ensure every driver, including those making one-off deliveries to site, will read and acknowledge the driver information pack. This is the case when the deliveries are scheduled not from the main material source locations. As detailed in the response below, where appropriate, additional mitigation has been included to provide assurance that drivers and pedestrians will be made aware of the hotspot locations.</p> <p><b>Test to show you've read and acknowledged.</b></p> <p>The Applicant provided a response to question TT 1.36 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>, in which it specified a 'read and understood' record will be maintained by the Main Works Contractor(s).</p> <p><b>Frequency of review of read/acknowledge?</b></p> <p>Monitoring to ensure that a driver has read/acknowledged the driver information pack will be undertaken when the driver information pack is issued to a driver and then quarterly, in line with the monitoring and reporting schedule.</p> <p>The pack is intended to be supplemented by additional mitigation for pedestrian and equestrian safety, and safety near schools identified within <b>7.3 Outline Construction Traffic Management Plan [Revision C]</b>, <b>7.11 Transport Assessment [APP-333]</b> and <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-275]</b>. The additional mitigation includes additional warning signage, vegetation maintenance, surface colouring under SLOW markings, crossing facilities at bellmouths and potential speed limit restrictions. Additional mitigation for schools includes avoiding school pick up and drop off times where appropriate.</p>

Action No.	ExA Description	Applicant's Response
49	<p><b>Management plan</b> Submission of updated outline PRow management plan.</p>	<p>An update to <b>7.6 Outline Public Rights of Way Management Plan [Revision B]</b> has been submitted at Deadline 4. This includes updates in relation to design changes at Bulphan and the EACN and amendments to text to address Local Highway Authority responses to the ExA's First Written Questions.</p>

**Appendix A.  
Five Estuaries  
Offshore Windfarm  
10.34.3 VP2 Barn  
Lane PRow**

## Appendix A: Five Estuaries Offshore Windfarm 10.34.3 VP2 Barn Lane PRow<sup>16</sup>

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<sup>16</sup> Five Estuaries Offshore Wind Farm (2025) 10.34.3 VP2 Barn Lane PRow (Deadline 5)



ESTUARIES

OFFSHORE WIND FARM

# FIVE ESTUARIES OFFSHORE WIND FARM

10.34.3 VP2 BARN LANE PROW

Application Reference:	EN010115
Document Number:	10.34.3
Revision:	A
Pursuant to:	Deadline 5
Eco-Doc Number:	005621116-01
Date:	January 2025

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In preparation of this document Five Estuaries Wind Farm Ltd has made reasonable efforts to ensure that the content is accurate, up to date and complete for purpose.

Revision	Date	Status/Reason for Issue	Originator	Checked	Approved
A	Jan 25	Deadline 5	OPEN	GoBe	VEOWF

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Extent of indicative National Grid EACN Substation



Photomontage showing Project 1 AIS, Project 2 GIS Substation & cumulative indicative National Grid EACN Substation.

View flat at a comfortable arm's length

OS reference: 608858E 229158N  
Eye level: 36.49 m AOD  
Direction of view: West  
Distance: 0.79km

Horizontal field of view: 53.5° (planar projection)  
Principal distance: 812.5 mm  
Paper size: 841 x 297 mm (half A1)  
Correct printed image size: 820 x 260 mm

Camera: Canon EOS 6D  
Lens: 50mm (Canon EF 50mm f/1.4)  
Camera height: 1.5 m AGL  
Date and time: 04/09/2023, 10:55

Five Estuaries Examination Deadline 4  
Figure 10.34.3a  
Viewpoint 2: Barn Lane PRow

Extent of indicative National Grid EACN Substation



Photomontage showing Project 1 AIS, Project 2 GIS Substation & cumulative indicative National Grid EACN Substation.

View flat at a comfortable arm's length

OS reference: 608858E 229158N  
Eye level: 36.49 m AOD  
Direction of view: West  
Distance: 0.79km

Horizontal field of view: 53.5° (planar projection)  
Principal distance: 812.5 mm  
Paper size: 841 x 297 mm (half A1)  
Correct printed image size: 820 x 260 mm

Camera: Canon EOS 6D  
Lens: 50mm (Canon EF 50mm f/1.4)  
Camera height: 1.5 m AGL  
Date and time: 04/09/2023, 10:55

Five Estuaries Examination Deadline 4  
Figure 10.34.3b  
Viewpoint 2: Barn Lane PRow

The logo for Five Estuaries features the word "FIVE" in a large, sans-serif font. The letter "I" is grey, "V" is purple, and "E" is pink. To the right of "FIVE" are three wavy lines representing water, colored blue, green, and yellow from top to bottom. Below "FIVE" is the word "ESTUARIES" in a smaller, grey, sans-serif font, and below that is "OFFSHORE WIND FARM" in an even smaller, grey, sans-serif font.

FIVE  
ESTUARIES  
OFFSHORE WIND FARM

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0333 880 5306

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Five Estuaries Offshore Wind Farm Ltd  
Windmill Hill Business Park  
Whitehill Way, Swindon, SN5 6PB  
Registered in England and Wales  
company number 12292474

**Appendix B.  
Cumulative  
Visualisations from  
Five Estuaries  
Offshore Wind Farm  
Document**

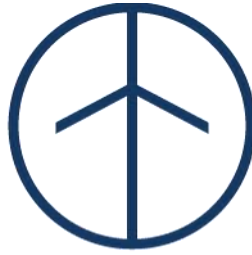
## Appendix B: Cumulative Visualisations from Five Estuaries Offshore Wind Farm Document<sup>17</sup>

9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 1 of 2 (Rev 0)

9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 2 of 2 (Rev 0).

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<sup>17</sup> Five Estuaries Offshore Wind Farm (2025) 9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 1 of 2 (Rev 0) and 9.44 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 2 of 2 (Rev 0).



**N O R T H F A L L S**

*Offshore Wind Farm*

**Cumulative visualisations at the  
onshore substation, including the  
Norwich to Tilbury Pylons wirelines  
Part 1 of 2 (Rev 0)**

Document Reference: 9.44  
Volume: 9  
Date: April 2025  
Revision: 0



**NORTH FALLS**

*Offshore Wind Farm*

**Project Reference: EN010119**

<b>Project</b>	North Falls Offshore Wind Farm
<b>Document Title</b>	Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 1 of 2 (Rev 0)
<b>Document Reference</b>	9.44
<b>Supplier</b>	Royal HaskoningDHV
<b>Supplier Document ID</b>	PB9244-RHD-ZZ-ON-RP-ON-0374

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<b>Revision</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Originator</b>	<b>Checked</b>	<b>Approved</b>
0	April 2025	Deadline 4	LUC	NFOW	NFOW

**Contents**

1 Cumulative visualisations at the onshore substation, including the Norwich to  
Tilbury Pylons wirelines ..... 5

**Tables**

No table of figures entries found.

## Glossary of Acronyms

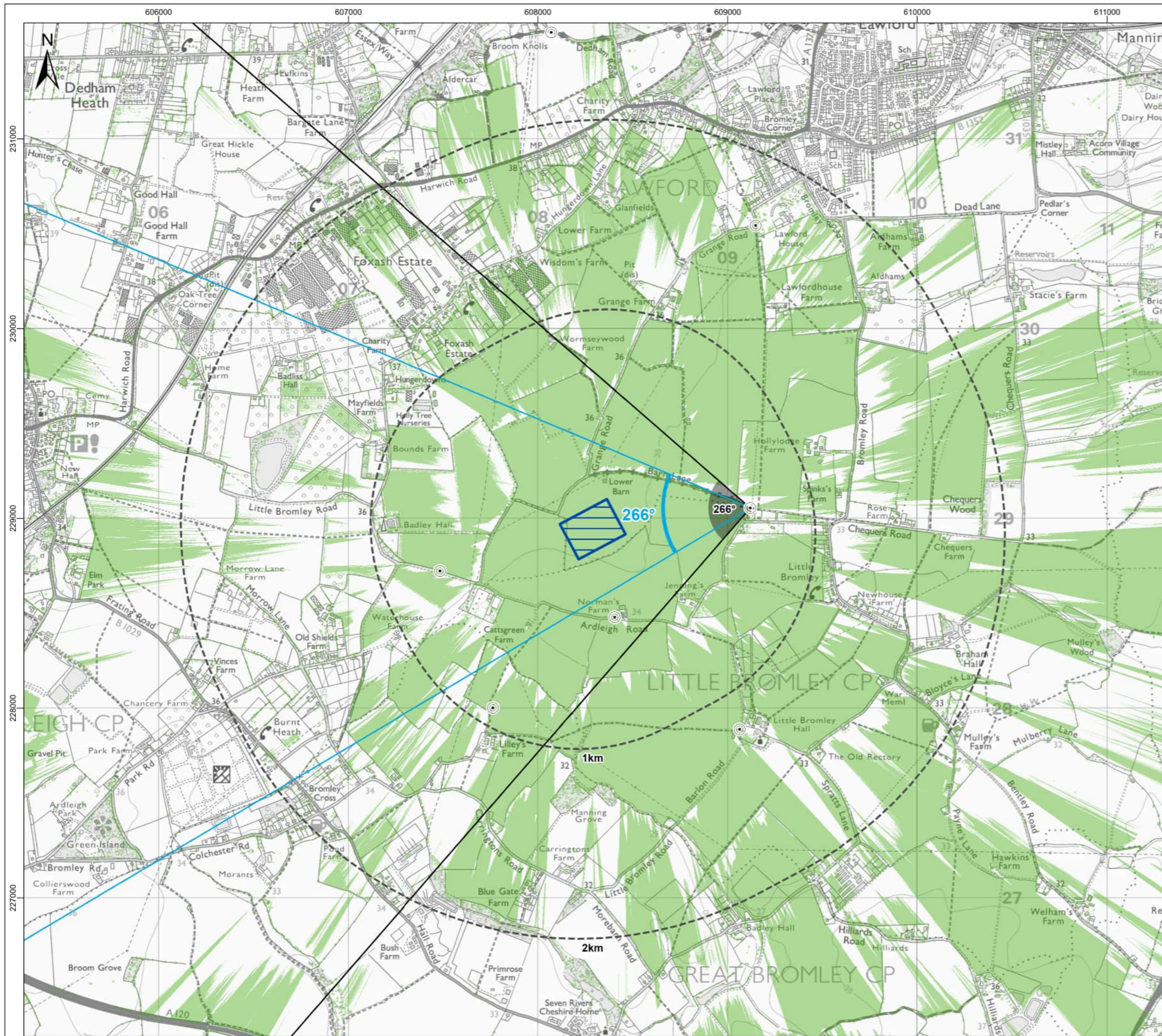
LVIA	Landscape and Visual Impact Assessment
ES	Environmental Statement

## Glossary of Terminology

Onshore substation	A compound containing electrical equipment required to transform and stabilise electricity generated by the Project so that it can be connected to the National Grid.
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## 1 Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines

1. This document contains updated versions of the visualisations provided in Environmental Statement (ES) Chapter 30 Figures **[APP-083 to APP-088]**, which show the developments considered within the cumulative effects assessment in ES Chapter 30 Landscape and Visual Impact Assessment (LVIA) **[APP-044]**. These visualisations have been updated to include the overhead lines for the proposed Norwich to Tilbury project. These updated visualisations have been provided following a request made by Essex County Council during a consultation meeting on 18 March 2025.
2. Updated cumulative visualisations have only been provided for those viewpoints where there is some visibility of the proposed Norwich to Tilbury project overhead lines. Therefore, no updated visualisations have been provided for Viewpoints 1 or 4.
3. Updated cumulative visualisations have been prepared for the baseline views and for the cumulative development (including the North Falls Offshore Wind Farm project, the Five Estuaries Offshore Wind Farm project and the Norwich to Tilbury project including the East Anglia Connection Node and overhead lines), including Year 1 planting, to demonstrate the worst-case scenario. Accordingly, fully mitigated views, (i.e. at Year 15 planting) are not shown (please refer to ES Chapter 30 Figures **[APP-083 to APP-088]** for the visualisations showing year 15 planting).



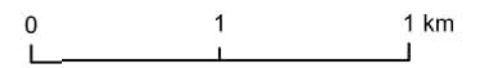
**Legend**

- North Falls Substation Operational Footprint
- Substation Operational Footprint 1km Interval Buffer
- Theoretical Visibility of Substation Components
- Viewpoint
- 53.5° Field of View
- 90° Field of View

**Notes**

The ZTV is calculated to a height of 18m (lighting masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



Data Source: OS, LUC, RHDHV

Drawing Title

**Viewpoint 2 - Bridleway at Barn Lane**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number	Figure Number
<b>PB9244-LUC-ZZ-ON-DR-GS-0046</b>	<b>30.2.2</b>

Scale	Plot Size	Datum	Projection
1:20,000	A3	OSGB36	BNG





Baseline photograph - Summer



OS reference:	609119 E 229055 N
AOD (Above Ordnance Datum):	34.3 m
Direction of view:	266°
Distance to proposed substation :	0.68 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 10:26



Visualisation showing cumulative development, including year 1 planting - (90 degree view)

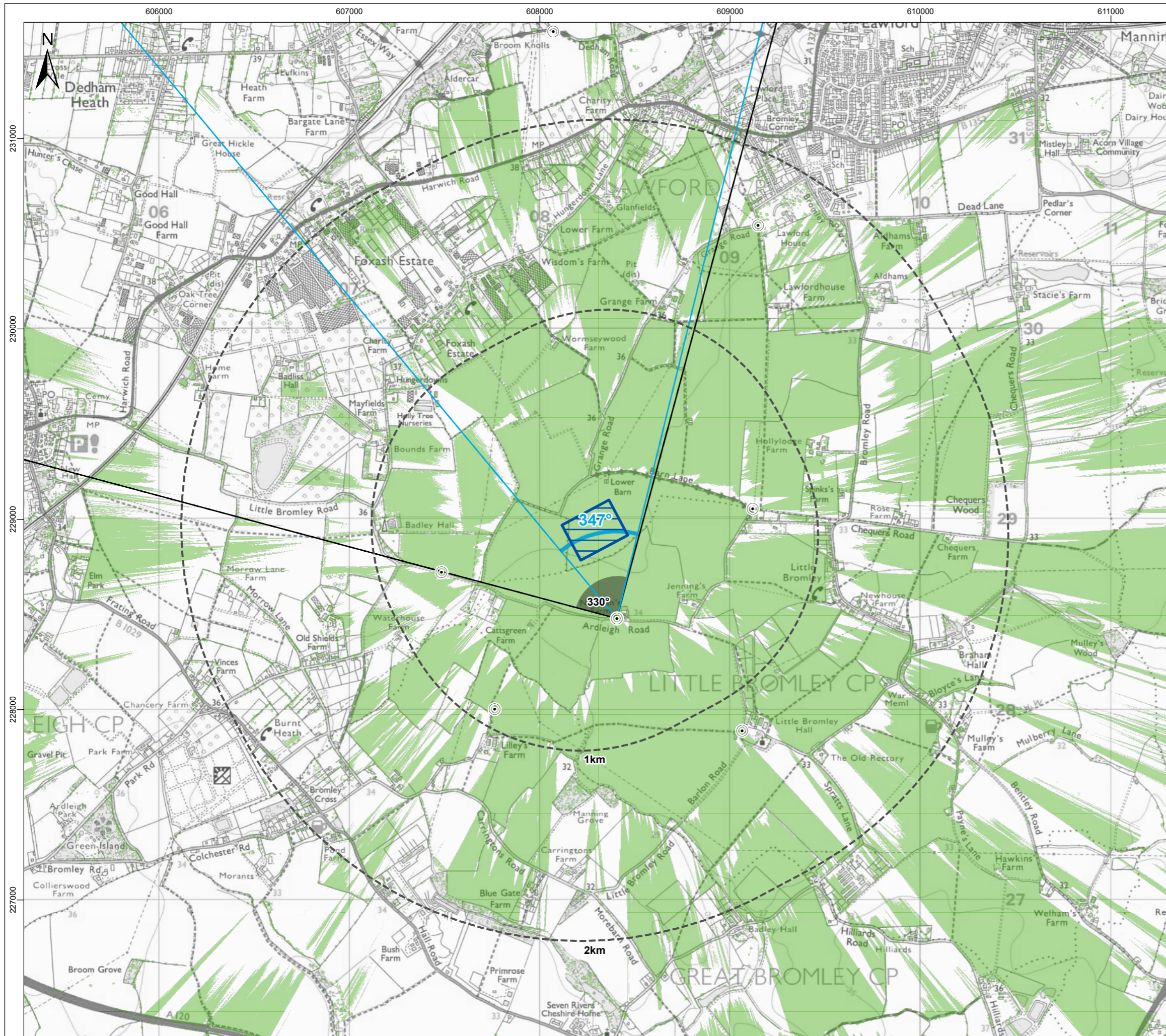


OS reference: 609119 E 229055 N  
 AOD (Above Ordnance Datum): 34.3 m  
 Direction of view: 266°  
 Distance to proposed substation : 0.68 km

Horizontal field of view: 90° (cylindrical projection)  
 Vertical field of view: 27°  
 Paper size: 841 x 297 mm (half A1)  
 Correct printed image size: 820 x 250 mm

Camera: NIKON D750  
 Lens: Nikkor AF 50mm f/1.8D  
 Camera height: 1.5 m (above AOD)  
 Date and time: 18/05/2022 10:26

Proposed Norwich to Tilbury OHL



**Legend**

- North Falls Substation Operational Footprint
- Substation Operational Footprint 1km Interval Buffer
- Theoretical Visibility of Substation Components
- Viewpoint
- 53.5° Field of View
- 90° Field of View

**Notes**

The ZTV is calculated to a height of 18m (lightning masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



Data Source: OS, LUC, RHDHV

Drawing Title

**Viewpoint 3 - Norman's Farm**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number  
**PB9244-LUC-ZZ-ON-DR-GS-0047**

Figure Number  
**30.2.3**

Scale 1:20,000	Plot Size A3	Datum OSGB36	Projection BNG
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Baseline photograph - Summer



OS reference:	608405 E 228479 N
AOD (Above Ordnance Datum):	34.3 m
Direction of view:	330°
Distance to proposed substation :	0.36 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 10:48



Visualisation showing cumulative development, including year 1 planting - (90 degree view)

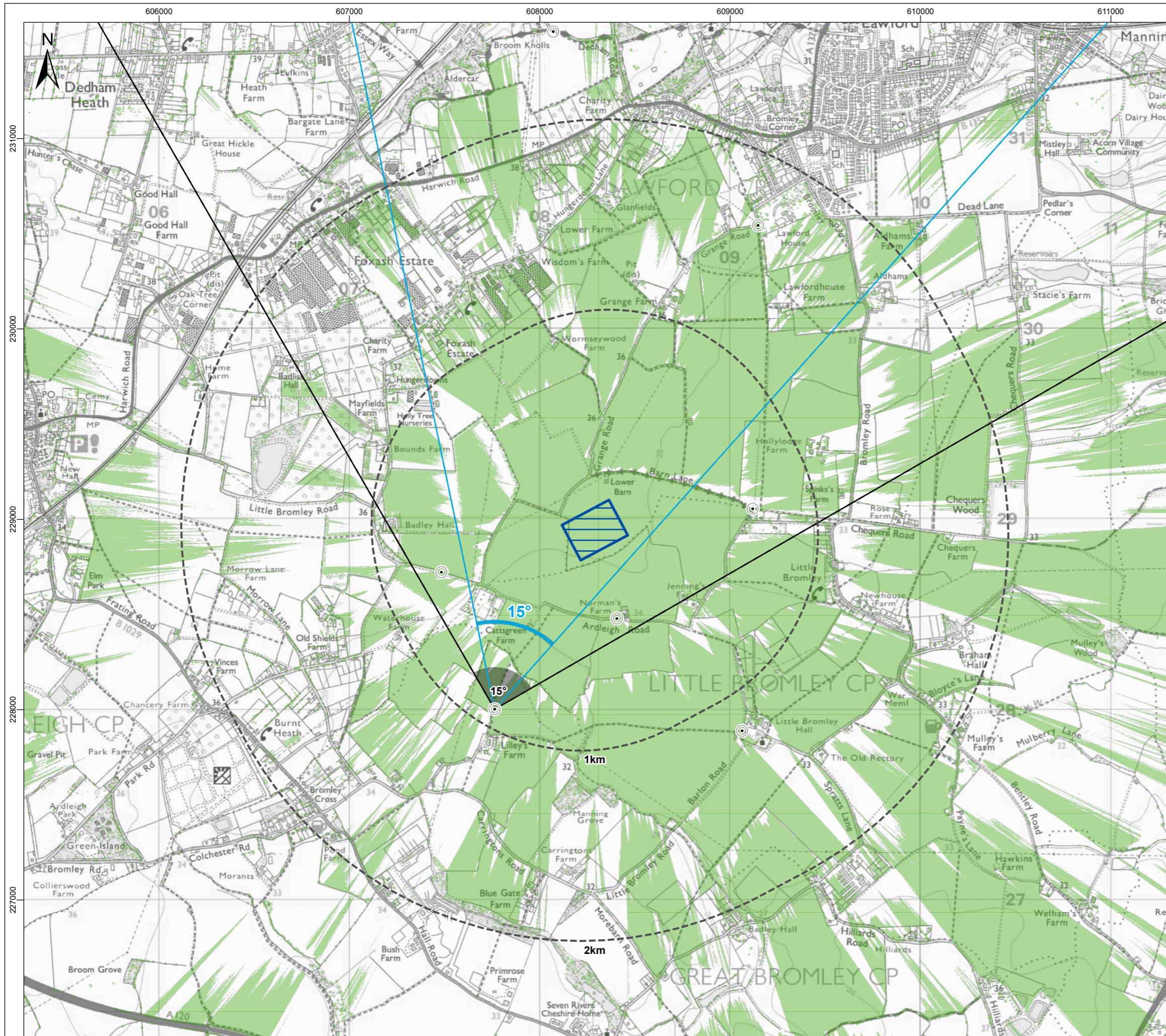


OS reference: 608405 E 228479 N  
 AOD (Above Ordnance Datum): 34.3 m  
 Direction of view: 330°  
 Distance to proposed substation : 0.36 km







Horizontal field of view: 90° (cylindrical projection)  
 Vertical field of view: 27°  
 Paper size: 841 x 297 mm (half A1)  
 Correct printed image size: 820 x 250 mm

Camera: NIKON D750  
 Lens: Nikkor AF 50mm f/1.8D  
 Camera height: 1.5 m (above AOD)  
 Date and time: 18/05/2022 10:48

Proposed Norwich to Tilbury OHL



**Legend**

-  North Falls Substation Operational Footprint
-  Substation Operational Footprint 1km Interval Buffer
-  Theoretical Visibility of Substation Components
-  Viewpoint
-  53.5° Field of View
-  90° Field of View

**Notes**

The ZTV is calculated to a height of 18m (lightning masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



Data Source: OS, LUC, RHDHV

Drawing Title

**Viewpoint 5 - Public Right of Way near Lilley's Farm**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number <b>PB9244-LUC-ZZ-ON-DR-GS-0049</b>	Figure Number <b>30.2.5</b>
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Scale 1:20,000	Plot Size A3	Datum OSGB36	Projection BNG
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Baseline photograph - Summer



OS reference:	607763 E 228002 N
AOD (Above Ordnance Datum):	34.4 m
Direction of view:	12°
Distance to proposed substation :	0.9 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 12:22



Visualisation showing cumulative development, including year 1 planting - (90 degree view)



OS reference: 607763 E 228002 N  
 AOD (Above Ordnance Datum): 34.4 m  
 Direction of view: 12°  
 Distance to proposed substation : 0.9 km

Horizontal field of view: 90° (cylindrical projection)  
 Vertical field of view: 27°  
 Paper size: 841 x 297 mm (half A1)  
 Correct printed image size: 820 x 250 mm

Camera: NIKON D750  
 Lens: Nikkor AF 50mm f/1.8D  
 Camera height: 1.5 m (above AOD)  
 Date and time: 18/05/2022 12:22

Proposed Norwich to Tilbury OHL



**NORTH FALLS**

*Offshore Wind Farm*



## **HARNESSING THE POWER OF NORTH SEA WIND**

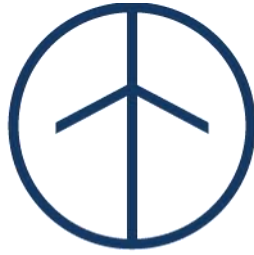
*North Falls Offshore Wind Farm Limited*

*A joint venture company owned equally by SSE Renewables and RWE.*

*To contact please email [contact@northfallsoffshore.com](mailto:contact@northfallsoffshore.com)*

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Registered in England and Wales Company Number: 12435947



**N O R T H F A L L S**

*Offshore Wind Farm*

**Cumulative visualisations at the  
onshore substation, including the  
Norwich to Tilbury Pylons  
wirelines Part 2 of 2 (Rev 0)**

Document Reference: 9.44  
Volume: 9  
Date: April 2025  
Revision: 0



**NORTH FALLS**

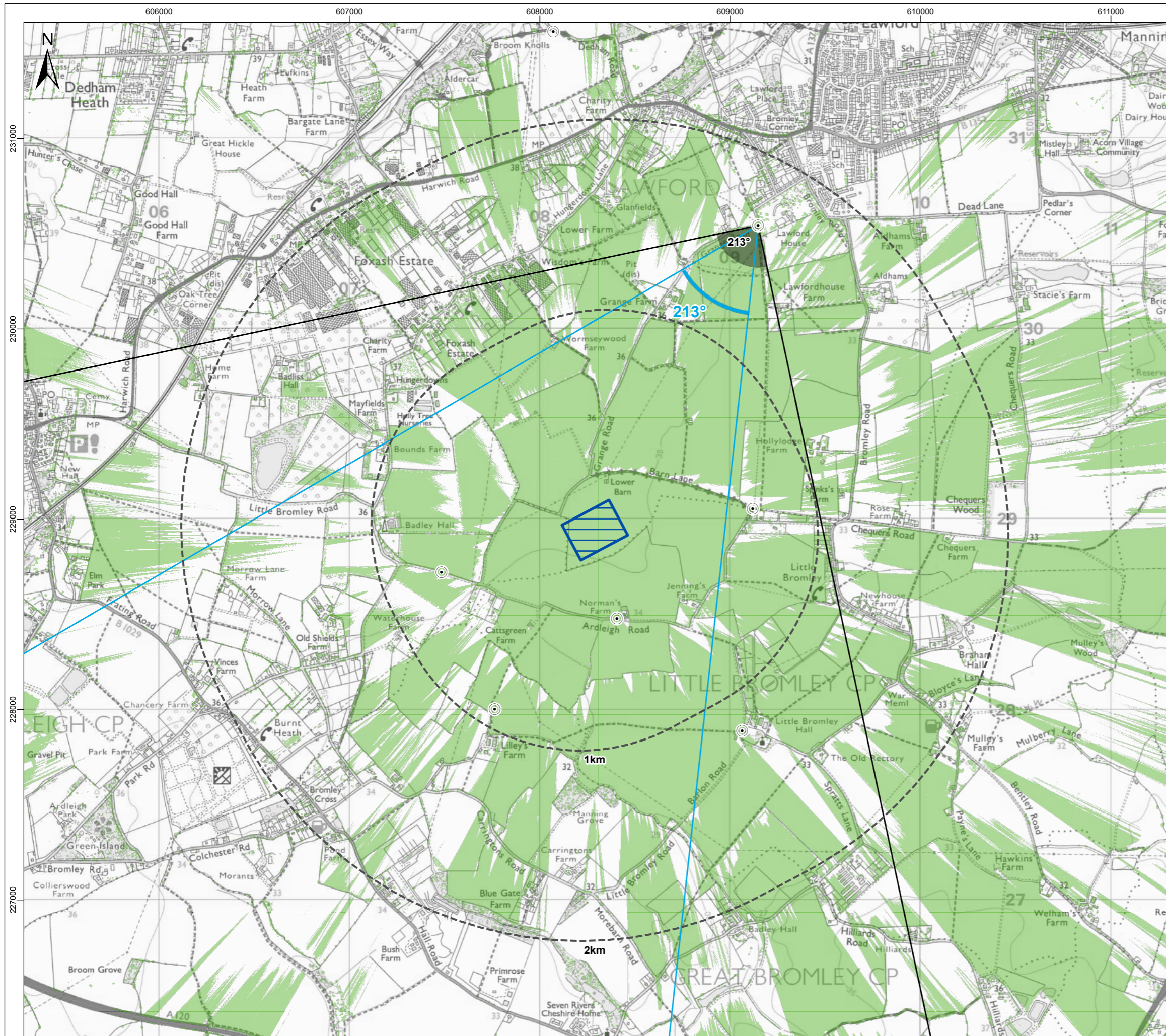
*Offshore Wind Farm*

**Project Reference: EN010119**

<b>Project</b>	North Falls Offshore Wind Farm
<b>Document Title</b>	Cumulative visualisations at the onshore substation, including the Norwich to Tilbury Pylons wirelines Part 2 of 2 (Rev 0)
<b>Document Reference</b>	9.44
<b>Supplier</b>	Royal HaskoningDHV
<b>Supplier Document ID</b>	PB9244-RHD-ZZ-ON-RP-ON-0374

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<b>Revision</b>	<b>Date</b>	<b>Status/Reason for Issue</b>	<b>Originator</b>	<b>Checked</b>	<b>Approved</b>
0	April 2025	Deadline 4	LUC	NFOW	NFOW



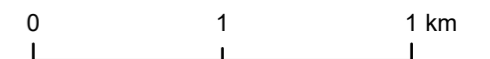
**Legend**

- North Falls Substation Operational Footprint
- Substation Operational Footprint 1km Interval Buffer
- Theoretical Visibility of Substation Components
- Viewpoint
- 53.5° Field of View
- 90° Field of View

**Notes**

The ZTV is calculated to a height of 18m (lightning masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



Data Source: OS, LUC, RHDHV

Drawing Title

**Viewpoint 6 - Grange Road**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number <b>PB9244-LUC-ZZ-ON-DR-GS-0050</b>	Figure Number <b>30.2.6</b>
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Scale 1:20,000	Plot Size A3	Datum OSGB36	Projection BNG
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Baseline photograph - Summer



OS reference:	609147 E 230544 N
AOD (Above Ordnance Datum):	35.2 m
Direction of view:	213°
Distance to proposed substation :	1.64 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 09:49



Visualisation showing cumulative development, including year 1 planting - (90 degree view)

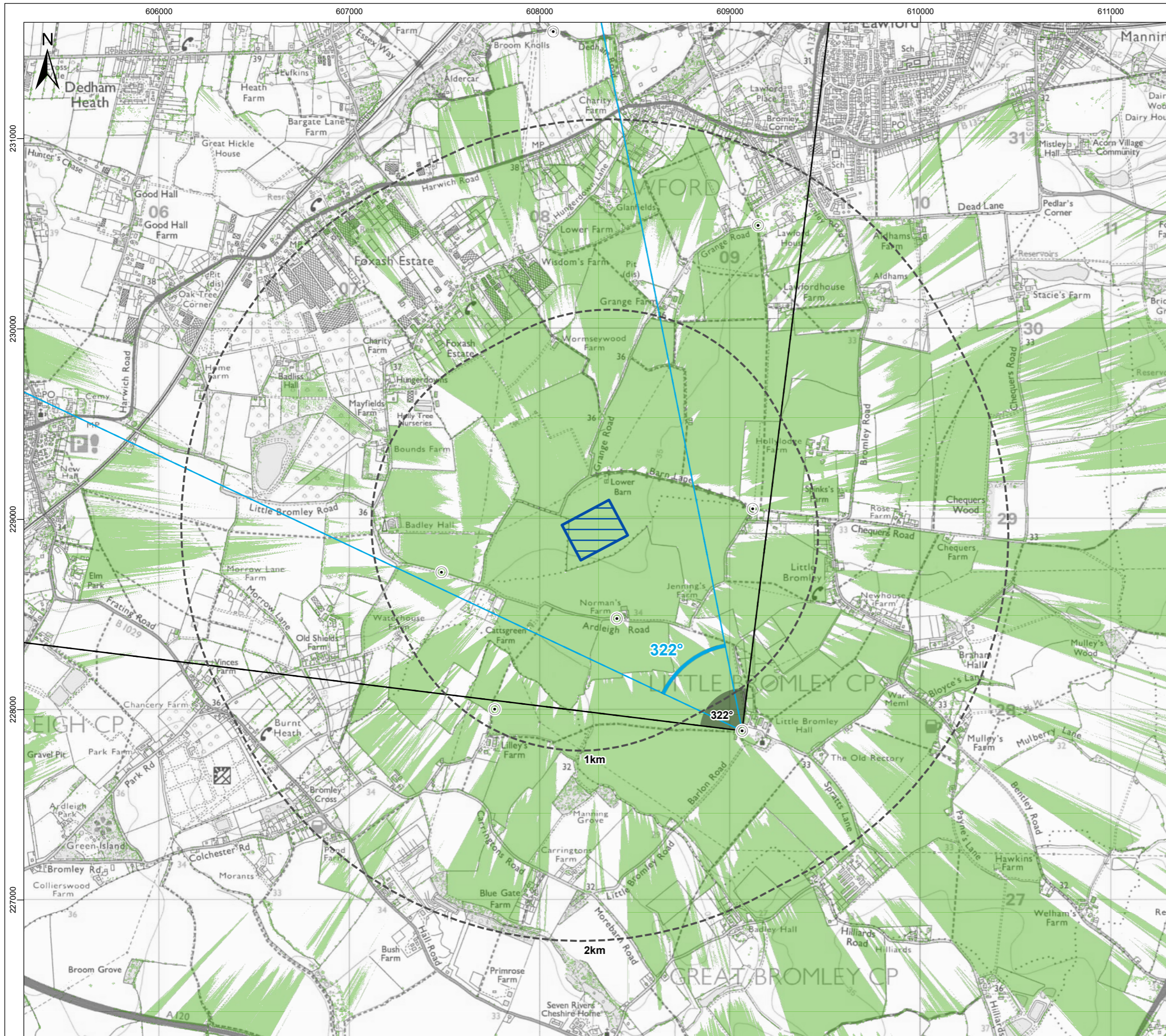


OS reference:	609147 E 230544 N
AOD (Above Ordnance Datum):	35.2 m
Direction of view:	213°
Distance to proposed substation :	1.64 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 09:49

Proposed Norwich to Tilbury OHL



**Legend**

- North Falls Substation Operational Footprint
- Substation Operational Footprint 1km Interval Buffer
- Theoretical Visibility of Substation Components
- Viewpoint
- 53.5° Field of View
- 90° Field of View

**Notes**

The ZTV is calculated to a height of 18m (lightning masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



Data Source: OS, LUC, RHDHV

Drawing Title

**Viewpoint 7 - Public Right of Way near Little Bromley Hall**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number	Figure Number
<b>PB9244-LUC-ZZ-ON-DR-GS-0051</b>	<b>30.2.7</b>

Scale	Plot Size	Datum	Projection
1:20,000	A3	OSGB36	BNG





Baseline photograph - Summer



Visualisation showing cumulative development, including year 1 planting - (90 degree view)

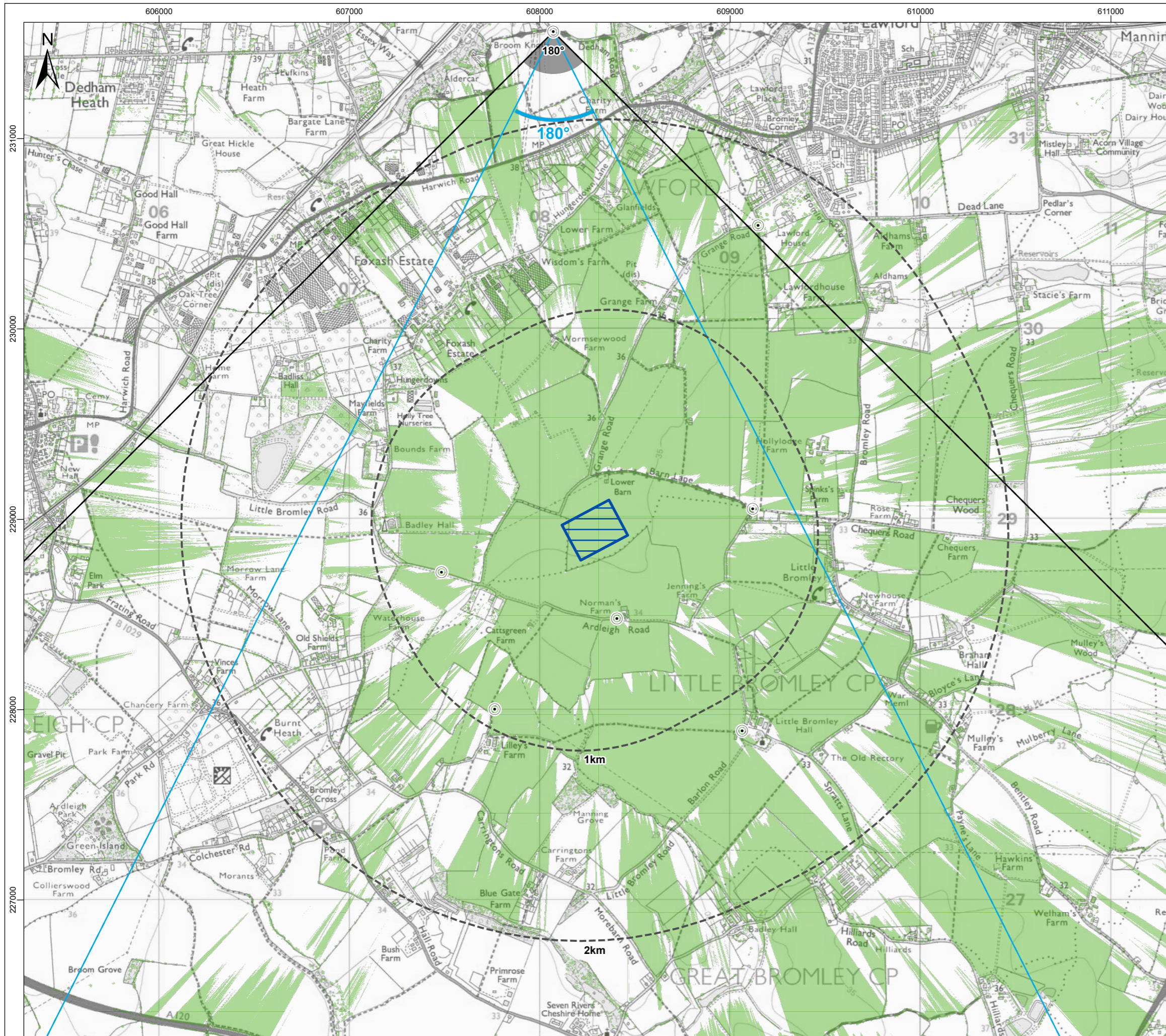


OS reference:	609063 E 227889 N
AOD (Above Ordnance Datum):	34.1 m
Direction of view:	322°
Distance to proposed substation :	1.19 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	18/05/2022 11:26

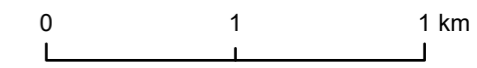
Proposed Norwich to Tilbury OHL	
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- Legend**
- North Falls Substation Operational Footprint
  - Substation Operational Footprint 1km Interval Buffer
  - Theoretical Visibility of Substation Components
  - Viewpoint
  - 53.5° Field of View
  - 90° Field of View

**Notes**  
 The ZTV is calculated to a height of 18m (lightning masts) for the substation operational footprint, from a viewing height of 1.5m above ground level.

The digital surface model (DSM) used is LIDAR 1m (2022) data (obtained from DEFRA in December 2023). A DSM includes a surface model of trees, buildings and hedges. Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcGIS Pro 3.2 software.



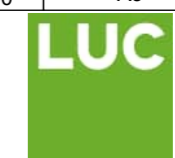
Data Source: OS, LUC, RHDHV  
 Drawing Title

**Viewpoint 8 - Essex Way, Dedham Road**

Rev	Date	Remarks	Drwn	Chkd
03	12/12/2022	Third issue	RW	JN
02	14/11/2022	Second Issue	RW	JN
01	28/09/2022	First issue	RW	JN

Drawing Number **PB9244-LUC-ZZ-ON-DR-GS-0052** Figure Number **30.2.8**

Scale 1:20,000 Plot Size A3 Datum OSGB36 Projection BNG





Baseline photograph - Winter



OS reference:	608071 E 231561 N
AOD (Above Ordnance Datum):	38.13 m
Direction of view:	180°
Distance to proposed substation :	2.48 km

Horizontal field of view:	90° (cylindrical projection)
Vertical field of view:	27°
Paper size:	841 x 297 mm (half A1)
Correct printed image size:	820 x 250 mm

Camera:	NIKON D750
Lens:	Nikkor AF 50mm f/1.8D
Camera height:	1.5 m (above AOD)
Date and time:	13/12/2023 09:12



Visualisation showing cumulative development - (90 degree view)



OS reference: 608071 E 231561 N  
 AOD (Above Ordnance Datum): 38.13 m  
 Direction of view: 180°  
 Distance to proposed substation : 2.48 km

Horizontal field of view: 90° (cylindrical projection)  
 Vertical field of view: 27°  
 Paper size: 841 x 297 mm (half A1)  
 Correct printed image size: 820 x 250 mm

Camera: NIKON D750  
 Lens: Nikkor AF 50mm f/1.8D  
 Camera height: 1.5 m (above AOD)  
 Date and time: 13/12/2023 09:12

Proposed Norwich to Tilbury OHL



**NORTH FALLS**

*Offshore Wind Farm*



**RWE**

## **HARNESSING THE POWER OF NORTH SEA WIND**

*North Falls Offshore Wind Farm Limited*

*A joint venture company owned equally by SSE Renewables and RWE.*

*To contact please email [contact@northfallsoffshore.com](mailto:contact@northfallsoffshore.com)*

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**North Falls Offshore Wind Farm Limited** Registered Address: Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, SN5 6PB, United Kingdom  
Registered in England and Wales Company Number: 12435947

**Appendix C.  
Figure 8.17 and  
Figure 8.19 from  
North Falls and Five  
Estuaries Offshore  
Wind Farms Joint  
Substations Design  
Guide**

# Appendix C: Figure 8.17 and Figure 8.19 from North Falls and Five Estuaries offshore wind farms Joint Substations Design Guide<sup>18</sup>

Figure 8.17 Landscape and Ecology Masterplan - Integration with Future Projects Design Guide  
Landscape and Ecology Masterplan & EACN Indicative Design

Figure 8.19 Landscape and Ecology Masterplan - Illustrative Integration with Future Projects

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<sup>18</sup> North Falls and Five Estuaries Offshore Wind Farms (2026) *Joint Substations Design Guide*

8.17 Landscape and Ecology Masterplan - Integration with Future Projects



### HARD LANDSCAPE

- Onshore Order Limits
- Onshore Substation Operational Boundary
- Onshore Substation  
(OnSS, Developed Land: Sealed Surface)
- Onshore Substation  
(OnSS, Artificial Unvegetated: Unsealed Surface)
- Indicative Substation Access Route
- Existing Overhead Line
- Overhead Line Easement  
(30m to be maintained clear of tall planting)
- Overhead Line Easement  
(6m to be maintained clear of tall planting)
- Cable Route Requirement for Construction

### SOFT LANDSCAPE

- Existing Trees To Be Retained
- Locally Native Broadleaved Woodland
- Woodland Shelterbelts
- Traditional Orchard w/ Species-Rich Grassland
- Traditional Orchard Trees  
(Planted in traditional Quincunx pattern on 10m grid with additional central tree)
- Copse  
(Indicative Groupings)
- Species-Rich Neutral Grassland
- Lowland Meadow Grasslands
- Dry Stony Area For Invertebrates  
(with Species-Rich Grassland)
- Agricultural Use
- Species Rich Native Hedgerow
- Species Rich Native Hedgerow with Trees
- Wetland Area (Grassland)
- SUDs/Pond
- Existing Ditch To Be Filled
- Existing Ditch To Remain
- Indicative Ditch Diversion
- Indicative Swale/Infiltration Ditch
- Indicative Private Water Pipe Location
- Indicative Farm Access Routes
- EACN Indicative Landscape Boundary

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 Incorporated in England and Wales

Client  
 Five Estuaries Offshore Wind Farm Ltd.  
 North Falls Offshore Wind Farm Ltd.

Project  
 Five Estuaries Offshore Wind Farm Ltd.  
 North Falls Offshore Wind Farm Ltd.

Drawing Title  
 Design Guide Landscape and Ecology Masterplan & EACN Indicative Design

Scale: **1:5000@A3** Date: **DEC 2025**

By: **SB** Status: **INFORMATION**

Checked: **SM** Approved: **XX**

Drawing Number  
 201463\_SLR\_Design Guide LEMP EACN

Rev  
**00**

1. This drawing is to be read in conjunction with all other drawings and specifications.
2. Do not scale off this drawing. Written dimensions to be taken only.
3. Any discrepancies found between this drawing and other drawings and specifications in the construction documents must be referred to the Landscape Architect prior to work commencing.
4. This drawing must not be copied in whole or in part without prior written consent of SLR Consulting Limited.

8.19 Landscape and Ecology Masterplan - Illustrative Integration with Future Projects



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