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Norwich to Tilbury

Volume 5: Reports and Statements

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County Council (NCC) (incl LLFA and Highways) - Tracked Changes Version

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1 Introduction

1.1 Overview

1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as ~~National Grid~~ [the Applicant](#) within this document) and Norfolk County Council (NCC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to NCC. The applicable matters considered within this SoCG apply to NCC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section [33](#)):

- Project development, description and design
- Ecology and Biodiversity
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing (including Air Quality and Noise and Vibration)
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- Cumulative Effects
- Development Consent Order
- Other Matters

~~Note: This draft SoCG has been prepared at an early stage of the DCO examination process, for Deadline [44](#). It is intended to be a live and working document which will be updated as the Project progresses and shared with NCC at key points for discussion. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.~~

1.2 Summary of Matters Under Discussion

1.2.1 [As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.](#)

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>Project development, description and design</u>		
<u>3.2.6 – Brick Kiln Lane CWS</u>	<p><u>NCC is concerned that the presence of overhead lines will lead to considerable tree removal or cutting.</u></p> <p><u>The assessments included within the ES [APP-236] present a worst-case assessment. The oCoCP requires targeted arboricultural surveys be carried out prior to the commencement of construction to inform detailed design with the objective of minimising tree and hedgerow loss as far as reasonably practicable.</u></p>	<u>Resolution likely by Deadline 7.</u>
<u>3.2.11 – Consideration of power delivery</u>	<p><u>NCC seek further assurances from the Applicant on opportunities to improve power delivery to Norfolk, including to support housing and employment growth.</u></p> <p><u>The Applicant is considering NCC’s request to financially contribute towards an Energy Plan.</u></p>	<u>The Applicant seeks to respond to NCCs request by Deadline 7.</u>
<u>3.2.12 – Community benefits</u>	<p><u>NCC notes the Applicant has not set out compensation arrangements for residents or businesses affected during or after construction, noting that the Government is still considering wider compensation and community benefit frameworks for transmission network upgrades.</u></p> <p><u>The Applicant is committed to providing a coordinated local and regional approach to community benefits. This would be delivered outside of the development consent process, as per the 2025 DESNZ guidance. This position is provided in Section 3.15 of Applicants Comments on Local Impact Reports [REP2-030]</u></p>	<u>Matter is unlikely to be agreed as it would be delivered outside the development consent process</u>
<u>Ecology and Biodiversity</u>		
<u>3.3.1 – Policy and legislation</u> <u>3.3.3 – Data sources</u> <u>3.3.6 – Key parameters and assumptions</u> <u>3.3.7 – Baseline conditions and receptors</u> <u>3.3.8 – Embedded mitigation</u> <u>3.3.9 – Standard mitigation</u> <u>3.3.10 – Additional</u>	<p><u>NCC is reviewing these sections relating to ecology and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.</u></p>	<u>Resolution likely to be by Deadline 7 following meeting with the technical specialists.</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>mitigation</u> <u>3.3.11 – Construction effects</u> <u>3.3.12 – Operational (and maintenance) effects</u> <u>3.3.14 – Outline LEMP</u> <u>3.3.15 – Biodiversity Net Gain</u> <u>3.3.16 – Arboriculture Impact Assessment</u>		
<u>Historic Environment</u>		
<u>3.6.9 – Additional mitigation</u>	<u>NCC is reviewing the additional mitigation measures proposed for Historic Environment effects (in relation to archaeological surveys). The Applicant will discuss and respond to any comments raised following the NCC review.</u>	<u>Resolution likely to be by Deadline 7 following engagement with Stakeholders regarding the next draft of the Outline AMS-OWSI.</u>
<u>3.6.15 – Outline Archaeological Mitigation Strategy and Outline WSI</u>	<u>NCC is to review the updated Outline Archaeological Mitigation Strategy and Outline WSI, scheduled for submission at Deadline 5. The Applicant will liaise with NCC regarding the document ahead of submission.</u>	<u>Resolution likely to be by Deadline 7 following engagement with Stakeholders regarding the next draft of the Outline AMS-OWSI.</u>
<u>Hydrology, Land Drainage and Flood Risk</u>		
<u>3.7.1 – Policy and legislation</u> <u>3.7.3 – Data sources</u> <u>3.7.5 – Key parameters and assumptions</u> <u>3.7.6 – Baseline conditions and receptors</u> <u>3.7.7 – Embedded mitigation</u> <u>3.7.8 – Standard mitigation</u> <u>3.7.9 – Additional</u>	<u>NCC is reviewing these sections relating to Hydrology, Land Drainage and Flood Risk and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.</u>	<u>Resolution likely to be by Deadline 7 following meeting with the technical specialists.</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>mitigation</u> <u>3.7.10 – Construction effects</u> <u>3.7.11 – Operational (and maintenance) effects</u>		
<u>3.7.12 – Outline CoCP (including Flood Warning and Evacuation Plan)</u>	<u>NCC considers the Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity and expects the plan to be aligned with EA and ADEPT guidance, with robust justification for departures. The Applicant considers the oCoCP includes all relevant construction mitigation measures specified in the ES and is appropriate for managing construction impacts from the Project.</u>	<u>Resolution likely to be by Deadline 7 following further discussion with the technical specialists.</u>
<u>3.7.13 – Flood Risk Assessment</u>	<u>NCC consider that the 7.9 Flood Risk Assessment [APP-331] lacks the site-specific modelling, detailed drainage design annexes and consistent application of stated methodologies. Engagement between the Applicant and NCC is ongoing and will inform future drafts of the Applicant's Drainage Strategy 8.2 Drainage Strategy DCO [REP1-072] which will be submitted later in the examination.</u>	<u>Resolution likely to be by Deadline 7 following further discussion with the technical specialists.</u>
<u>Landscape and Visual</u>		
<u>3.8.3 – Data sources</u> <u>3.8.5 – Key parameters and assumptions</u> <u>3.8.11 – Operational (and maintenance)</u> <u>3.8.12 – Outline CoCP</u> <u>3.8.13 – Outline LEMP</u>	<u>NCC is reviewing these sections relating to Landscape and Visual and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.</u>	<u>Resolution likely by Deadline 7.</u>
<u>3.8.6 – Baseline conditions and receptors</u>	<u>NCC seek clarity on whether the tranquillity of the Waveney Valley has been suitably considered. The Applicant considers the baseline conditions and receptors presented to be appropriate.</u>	<u>Matter unlikely to be agreed.</u>
<u>3.8.9 – Additional mitigation</u>	<u>NCC considers that the applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. The Applicant has requested NCC review Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] which sets out the Applicant's position on landscape mitigation and compensation.</u>	<u>Resolution likely by Deadline 7.</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>Socio-economics, Recreation and Tourism</u>		
<u>3.9.7 – Embedded mitigation</u>	<u>NCC is reviewing these sections relating to Socio-economics, Recreation and Tourism and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.</u>	<u>Resolution likely by Deadline 7.</u>
<u>3.9.9 – Additional mitigation</u>		
<u>3.9.11 – Operational (and maintenance)</u>		
<u>3.9.13 – Employment and skills plan</u>	<u>NCC to consider the Applicant’s updated position and proposed draft employment and skills plan.</u>	<u>Resolution likely by Deadline 7.</u>
<u>Traffic and Transport</u>		
<u>3.10.3 – Data sources</u>	<u>NCC has queried the datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.4 – Assessment methodology</u>	<u>NCC consider that a separate PRow Chapter in the ES is required. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.6 – Baseline conditions and receptors</u>	<u>NCC has queried the datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.10 – Construction effects</u>	<u>NCC’s concerns relating to construction effects on PAR 8. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 7</u>
<u>3.10.20 – Mitigation measures</u>	<u>NCC has sought clarification on what "other works on the highway" includes. The Applicant has provided clarification in the updated CTMP.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.22 – Baseline conditions</u>	<u>NCC has queried datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.28 – Construction workforce trips</u>	<u>NCC has sought clarification on definition of "construction workers peak". The Applicant has provided clarification through further engagement with NCC and considers that this matter can be moved to agreed.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.31 – Pre- and Post Construction Surveys</u>	<u>NCC has requested NCC highway representatives and/or area engineers to be present during pre- and post-construction surveys. The Applicant has confirmed that is included in the CTMP and considers that this matter can be moved to agreed.</u>	<u>Resolution likely by Deadline 5</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>3.10.34 - Policy</u>	<u>NCC has clarified local policies and Travel Plan guidance referenced are for development sites, not NSIPs. The Applicant has acknowledged this and clarified that these were used as indicative guidance in the preparation of the CWTP.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.35 – Site accessibility review</u>	<u>NCC has suggested further consideration for the provision of a mini bus (near Norwich Substation / Dunston Hall). The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.36 – Targets, strategy, and measures</u>	<u>NCC has requested additional information on the monitoring of targets established in the CWTP and promoting public transport use. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.37 – Monitoring and review</u>	<u>NCC reviewed the draft CWTP (shared in May 2025) and provided no comments on Monitoring and Review. The Applicant understands there are no outstanding comments to address.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.38 – Construction access approach</u>	<u>NCC has sought clarification on the construction access strategy and maintenance access during the operational phase. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.39 – Primary access route selection</u>	<u>NCC raised concerns over a weight-restricted railway bridge on the A140 Ipswich Road. The Applicant has confirmed that this structure is beyond an access point and will not affect the sensitivity of Link PAR 1. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.40 – Primary access route selection</u>	<u>NCC has raised Right-turn at A140 Ipswich Road/Mangreen Lane. The Applicant has proposed avoiding the AM peak hour as suitable mitigation. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.41 – Primary access route selection</u>	<u>NCC has requested that the Applicant liaise with Network Rail to confirm suitable capacity of the level crossing on B1134 Station Road for construction traffic. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.42 – Primary access route selection</u>	<u>NCC seeks a commitment that all HGV traffic accessing the A1066 crossing point uses PAR 9 instead of PAR 8. The Applicant is seeking to agree a suitable distribution of traffic on the A1066 between the PAR 8 and PAR 9. The Applicant will</u>	<u>Resolution likely by Deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>continue to liaise with NCC in relation to this matter.</u>	
<u>3.10.43 – Construction access and crossover design</u>	<u>NCC shared preference for use of haul routes and for access points to be designed to be sympathetic to existing surroundings and expected traffic. The Applicant's proposed strategy is aligned with NCC's position.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.45 – Traffic management – core working hours</u>	<u>NCC sought clarification on the list of operations that may take place outside of the core working hours. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 7</u>
<u>3.10.46 – Traffic management</u>	<u>NCC sought clarification on HGVs travelling outside working hours to get to site. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.47 – Traffic management</u>	<u>NCC sought clarification on LGVs and HGVs outside peak hours. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.48 – Traffic management</u>	<u>NCC sought clarification on the suitability of Mangreen Lane for construction traffic and proposed mitigation measures. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.49 – Traffic management</u>	<u>NCC sought clarification on the suitability of Fundenhall Road and B1113 Road for construction traffic. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.50 – Traffic management</u>	<u>NCC sought clarification on the duration of proposed signage at RG56. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.10.51 – Traffic Management</u>	<u>NCC sought clarification on how numbers of HGVs to and from the site would be controlled. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 7</u>
<u>3.10.52 – Traffic Management</u>	<u>NCC queried provision of HGV parking and associated driver facilities. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 7</u>
<u>3.10.53 – Traffic Management</u>	<u>NCC queried management and arrangements for foreseeable disruptions. The Applicant will continue to liaise with NCC in relation to this</u>	<u>Resolution likely by Deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>matter.</u>	
<u>3.10.55 – Proposed Construction Access on the A1066 via Diss and Thetford</u>	<u>NCC raised concerns of construction traffic using the A1066 (PAR 8) based on traffic counts and clarification on usage of congestion signs at various sites along the route. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 7</u>
<u>Public Rights of Way (PRoW)</u>		
<u>3.11.2 – Types of ProW</u>	<u>NCC provided comments on the draft PRoW Management Plan (shared in May 2025). The Applicant has responded and seeks confirmation from NCC that there are no outstanding comments.</u>	<u>Resolution likely by Deadline 5</u>
<u>3.11.3 – Proposed management regime approach</u>		
<u>3.11.6 – PRoW surveys</u>	<u>NCC raised queries on the list of PRoWs proposed to be surveyed in the ES. The Applicant will continue to liaise with NCC in relation to this matter.</u>	<u>Resolution likely by Deadline 5</u>
<u>Cumulative effects</u>		
<u>3.12.7 – Embedded mitigation</u>	<u>NCC is reviewing these sections relating to Cumulative effect and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.</u>	<u>Resolution likely by Deadline 7.</u>
<u>3.12.8 – Standard mitigation</u>		
<u>3.12.9 – Additional mitigation</u>		
<u>3.12.12 – Outline CoCP</u>		
<u>Development Consent Order</u>		
<u>3.13.3a– Construction hours</u>	<u>NCC is concerned that the working hours will cause unacceptable disturbance. The Applicant will continue to liaise with NCC on this matter.</u>	<u>Resolution likely by Deadline 7.</u>
<u>3.13.3b – Construction hours</u>	<u>NCC is concerned that the range of activities listed in the outline CoCP which takes place outside of core working hours is too broad. The Applicant will continue to liaise with NCC on this matter.</u>	<u>Resolution likely by Deadline 7.</u>
<u>3.13.4 – Surface water drainage management plan</u>	<u>NCC seeks a surface water drainage or management plan to be submitted for approval. The Applicant considers this requirement is already secured through Commitment GG22 in the Outline Code of Construction Practice, which provides for a Surface Water Management Plan to be in</u>	<u>Resolution likely by Deadline 4.</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>accordance with the Drainage Strategy submitted at Deadline 1.</u>	
<u>3.13.5 – Employment and skills plan</u>	<u>NCC seeks an employment and skills plan to be submitted for approval.</u> <u>The Applicant is preparing an Employment and Skills Plan for submission at Deadline 5.</u> <u>Implementation of this plan will be secured by a new DCO Requirement.</u>	<u>Resolution likely by Deadline 5.</u>
<u>3.13.7 – DCO Wording</u>	<u>Discussions are ongoing in relation to detailed drafting points on:</u> <ul style="list-style-type: none"> <u>• Closure of public rights of way;</u> <u>• Street works without the consent of the street authority; and</u> <u>• Street works subject to reasonable conditions</u> 	<u>Resolution likely by Deadline 7</u>

1.3 ~~1.2~~ Project Description

1.3.1 ~~1.2.1~~ The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1))
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation

- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

1.3.2 ~~1.2.2~~ In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.3.3 ~~1.2.3~~ As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.3.4 ~~1.2.4~~ The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.4 ~~1.3~~ Format and Structure of this Document

1.4.1 ~~1.3.1~~ This SoCG is structured as follows:

- **Section 22** provides a summary of the key engagement undertaken to date with NCC
- **Section 33** summarises the key matters and captures the status of each issue / matter
- **Section 44** includes the sign off sheet

2. Record of Key Engagement

- 2.1.1 National Grid has engaged with NCC on the Project throughout the pre-application process. This has included:
- Non-statutory consultation in Spring 2022 and Summer 2023
 - Statutory consultation in Spring 2024
 - Targeted Consultations in Spring 2025
 - Regular meetings with lead officers about the Project as a whole
 - Regular ‘Thematic Group’ meetings bringing together host authorities to discuss specific topics
 - One to one / small group technical meetings on specific detailed matters
 - Sharing of papers and documentation at key stages
- 2.1.2 Further details on National Grid’s engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

- 2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and NCC.

Table 2.1 Summary of engagement between National Grid and NCC

Date	Format	Topic/Description
General		
April 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.

Date	Format	Topic/Description
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline Landscape and Ecological Management Plan (LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss National Grid's approach to targeted consultations
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid issued the second iteration of the draft Outline Code of Construction Practice (CoCP)
January 2025	Meeting	National Grid held a meeting to discuss comments from the second iteration of the oCoCP and oLEMP
January 2025	Email Correspondence	National Grid issued the draft Statement of Common Ground (SoCG)
April 2025	Meeting	Meeting to go through host authority workshop updates (NCC unable to attend original workshop)
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Code of Construction Practice oCoCP
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy

Date	Format	Topic/Description
May 2025	Email Correspondence	National Grid issued the Long List of Other Developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
January 2026	Meeting	Meeting to progress Statement of Common Ground
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground Deadline 4 submission
March 2026	Meeting	All host authority workshop
Ecology and Biodiversity		
July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from NCC and other authorities.
August 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	National Grid shared the Outline Landscape and Ecological Management Plan (oLEMP)

Date	Format	Topic/Description
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
February 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground.
Contaminated Land, Geology and Hydrogeology		
August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).
Health and Wellbeing (including Air Quality and Noise and Vibration)		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.

Date	Format	Topic/Description
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2023	Email Correspondence	NCC requested consideration of mental health during operation. NCC also requested that baseline data should be provided to aid further levels of detail where possible.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the health and wellbeing section of the Environmental Statement.
Historic Environment		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities to agree methodology for the

Date	Format	Topic/Description
		selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including Zone of Theoretical Visibility (ZTV)) for feedback from all host authorities, Natural England and Historic England.
March 2024	Meeting	Archaeology Working Group Meeting with archaeological advisor from NCC in attendance.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members for information.
June 2024	Meeting	Archaeology Working Group Meeting.
July 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders.
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site
June	Technical Note	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	National Grid shared Priority Geophys Prelim

Date	Format	Topic/Description
		Grayscales with stakeholders for consideration
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
October 2025	Meeting	Archaeology Working Group Meeting
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	National Grid shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Technical Note	National Grid shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground.
February 2026	Email Correspondence	National Grid shared the Supplementary Environmental Information submitted to Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group
March 2026	Meeting	Archaeology Working Group
March 2026	Meeting	Meeting to discuss the approach to the phase 2 trial trenching
Hydrology, Land Drainage and Flood Risk		
June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
July 2023	Email Correspondence	Response to comments received on the technical note setting out the approach to preparing the FRA.
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.
September 2024	Technical Note	National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	National Grid held a meeting to discuss comments from

Date	Format	Topic/Description
		stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	National Grid issued the Draft Flood Risk Assessment (FRA) for agreement/comment
January 2025	Meeting	National Grid held a meeting to discuss comments raised from the draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	National Grid issued Draft Flood Risk Assessment (FRA) for agreement/comment
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the hydrology and land drainage section of the Environmental Statement
<u>March 2026</u>	<u>Email correspondence</u>	<u>National Grid shared a copy of the Drainage Strategy to assist with reviewing project responses to stakeholder feedback.</u>
<u>April 2026</u>	<u>Meeting</u>	<u>Meeting with LLFA to discuss Drainage Strategy and other outstanding comments</u>
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Norfolk. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
April 2023	Meeting	National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders (including NCC) provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the

Date	Format	Topic/Description
		information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to ZTV mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	National Grid shared the draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits with NCC and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
October 2024	Meeting	National Grid held a focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated view point viewpoint information data following from the landscape thematic workshops
December 2024	Meeting	Meeting to agree photography locations and photomontages for the ES
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	National Grid hosted an optional thematic meeting to discuss any questions relating to the Environmental Statement.
January 2026	Meeting	Meeting to discuss the LVIA aspects of the Statement of Common Ground.
March 2026	E-mail Correspondence	National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional

Date	Format	Topic/Description
		<u>landscape and visual measures in NCC's Local Impact Report</u>
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and PRow during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Email Correspondence	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism
September 2025	Meeting	National Grid held an optional thematic group meeting to discuss the Environmental Statement.
Traffic and Transport		
June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting.

Date	Format	Topic/Description
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.
August 2023	Meeting	National Grid held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities.
November 2023	Meeting	National Grid held a PRoW Thematic Group Meeting.
January 2024	Meeting	National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) (document reference 7.3) at the Transport Working Group Meeting.
March 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities (including NCC).
June 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management.
July 2024	Email Correspondence	Proposed AIL Routes issued for comment.
July 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. Discussed planning applications and impact of access to Norwich Substation and need to understand duration of works/mitigation
August 2024	Meeting	National Grid held a Transport Working Group Meeting. Discussion over DCO projects that may overlap the Project. Discussion held on staff worker movements and sensitivity of junctions in Norfolk.
August 2024	Meeting	Meeting to discuss the PRoW survey locations.
August 2024	Email	NCC feedback on proposed AIL routes/structures

Date	Format	Topic/Description
	<u>Correspondence</u>	<u>received.</u>
September 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of Transport Assessment (TA) was presented. National Grid provided an overview of the initial capacity assessment methodology using.
October 2024	Meeting	National Grid held a Transport Working Group Meeting.
November 2024	Meeting	National Grid held a LHA Engagement Meeting to discuss potential changes following statutory consultation, visibility splays and traffic management methodology, access for existing utilities and AILs.
<u>December 2024</u>	<u>Email Correspondence</u>	<u>Email received from NCC outlining process for obtaining Approvals in Principle (AIPs) for assessment of structures along proposed AIL routes and how this would be managed alongside the DCO application.</u>
January 2025	Meeting	National Grid held a Transport Working Group Regional Meeting. Presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where walker, cyclist and horse rider (WCH) Amenity.
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy.
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures.
<u>February 2025</u>	<u>Email Correspondence</u>	<u>NCC feedback on proposed AIL routes received.</u>
<u>February 2025</u>	<u>Email Correspondence</u>	<u>National Grid issued AIL Structures Register for NCC review and feedback.</u>
<u>February 2025</u>	<u>Email Correspondence</u>	<u>NCC structural feedback for proposed AIL routes received (AIL structures register issued to N CC in Feb 2025 returned with comments).</u>
March 2025	Meeting	Additional Institute of Environmental Management and Assessment (IEMA) Mitigation Meeting. Presented examples of the likely environmental mitigation measures following draft ES assessment of effects on Primary Access Routes predominately for WCH Amenity.
March 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. National Grid's position on various elements of the traffic and transport and highways design clarified.
April 2025	Meeting	National Grid held a NCC Highway Mitigation Workshop. Highway mitigation proposals on Wymondham Road were discussed.

Date	Format	Topic/Description
April 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. AIL process, routes and agreement on approach sought ahead of DCO.
April 2025	Meeting	National Grid held a NCC workshop to discuss the Work in Progress Transport Assessment. NCC comments on the draft document were discussed.
May 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
July 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
September 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
November 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.
January 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Construction Traffic Flows and Statements of Common Ground matters and updated positions from NCC.
February 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.
February 2026	Email Correspondence	National Grid issued a register detailing updates that were made to the draft CTMP between Norfolk County Council providing comments and the formal DCO submission of the CTMP.
February 2026	Email Correspondence	Norfolk County Council confirmed via email the acceptance of updates to the SoCG and CTMP, and provided some additional comments.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to NCC which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, amber, green status shows the level of agreement with NCC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section [3.3](#)

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 ~~Table 3.3~~[Table 3.2](#) to Table 3.13 provides the matters agreed, not agreed or under discussion in relation to the various topics.

3.2 Project development, description and design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	<p>Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia.</p> <p>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p> <p>For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>NCC Response to Statutory Consultation (June 2024):</p> <p>The need for upgrading the electricity transmission network at both the national and local level is recognised and this proposal would assist in meeting the Government's objectives on net zero and delivering offshore wind power.</p>	Agreed
3.2.2	Project timing	<p>Timing for the projectProject is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.</p> <p>Appendix 2 of the NESO Clean Power 2030</p>	<p>NCC Response to Statutory Consultation (June 2024):</p> <p>The Hiorns' Report commissioned by Norfolk, Suffolk and Essex County Councils concluded that while there is a demonstrable need for additional capacity to the existing network arising from new offshore wind generation and low carbon energy generation in the region (Sizewell C), it does</p>	Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.</p> <p>For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>not support the current delivery timetable of 2030 outlined by National Grid; and instead suggests additional capacity would not be needed until 2035+</p> <p>Furthermore the Report suggests that the cost of the offshore alternatives have been over-estimated by National Grid.</p>	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p>Updated Strategic Options and Backcheck Review documents Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p> <p>For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore Alternatives' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>The County Council's position (2024) remains as set out to previous consultation rounds and supports in principle an offshore option; or where this proves undeliverable then support should be given towards an onshore underground option</p> <p>as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury.</p>	<p>Not agreed IN</p>
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (2024) (which covers the development of new energy infrastructure) which concludes that in most cases, the government</p>	<p>NCC Response to Targeted Consultations (Feb 2025):</p> <p>Previous comments relating to alternative transmission alternatives have not been</p>	<p>Not agreed IN</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p>Updated Strategic Options and Backcheck Review documents Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p> <p>The work undertaken shows that undergrounding, including using High Voltage Direct Cables (HVDC), would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p>For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>addressed in the current consultation and as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury. The County Council continues to support in principle either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded.</p>	
Project development process - Design				
3.2.5	Waveney Valley	<p>At statutory consultation in 2024, National Grid presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and</p>	<p>NCC is deeply disappointed that the use of underground cables through the Waveney Valley cannot be achieved without environmentally disruptive, technically uncertain or disproportionately costly techniques. It is NCC's strong view that the</p>	<p>not agreed N</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation techniques for underground cables in response to GI surveys and the Waveney and Little Ouse Recovery project.</p> <p>For the Applicant's position on the Waveney Valley, please refer to Section 3.5 'Alternatives – Waveney Valley' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>absence of an undergrounded alternative for the Waveney Valley leaves a hole in the project's mitigation for landscape and visual effects which urgently needs to be filled. The failure of a feasible undergrounding option does not absolve the applicant from the need to consider ways in which impacts can be reduced, mitigated or compensated for.</p> <p>NCC would ask that the applicant provide more detail to justify the statement at paragraph 4.6.16 of the Design Development Report (regarding WVA) that tunnelling (as opposed to horizontal directionless drilling or driven pipe methods) 'would be possible but at a level of cost not considered to be compatible with National Grid's duties to be economical' NCC would welcome discussions with the applicant to explore these opportunities.</p>	
3.2.6	Brick Kiln Lane County Wildlife Site	<p>The proposed route of the overhead line avoids woodland impacts within the Brick Kiln County Wildlife Site (CWS) further to the east, but as a result unavoidably increases the effects on the adjacent area of woodland within the Tas Valley. It will be necessary to undertake some tree removal within the woodland to provide clearance for the overhead line, but this will be limited to only the amount of tree cover necessary to meet safe electrical clearance requirements. Typically, tree removal is potentially required close to the alignment (20 m to either side of the centreline) with canopy management (rather than tree removal) for a</p>	<p>NCC has been made aware of disagreement over the alignment of the cable route at Meadow Wood near Bunwell which is detailed in section 4.4 of the Design Development Report. The alignment has been routed to avoid the Brick Kiln Lane County Wildlife Site but now is set to over sail a woodland which contains a number of individual trees of high arboricultural value. NCC is concerned that the presence of overhead electrical cables will mean that a considerable number of valuable trees are removed or cut back for maintenance or safety reasons. It is not clear where in the</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>further 8 m beyond the 20 m.</p> <p>In addition to the 2023, 2024 and 2025 Design Development Reports, further information can be found in the on Sheet 8 of 2.16 Trees and Hedgerows to be Removed and or Managed Plans (- Section A, Sheet 8 of 13, [APP-048] and 5.1 Consultation Report: [APP-066]. The assessments included within the Environmental Statement, including the Arboricultural Impact Assessment [APP-236] currently present a worst-case assessment of potential tree loss within the area. Commitments secured through the Outline Code of Construction Practice [REP3-025] require that, following completion of detailed design and prior to the commencement of construction, targeted arboricultural surveys are undertaken where trees or hedgerows may be affected. The results of these surveys will inform detailed design development and construction planning, with the objective of minimising tree and hedgerow loss as far as reasonably practicable.</p> <p>A suitably qualified Project Arboriculturist and/or Arboricultural Clerk of Works will be appointed to oversee tree protection measures in accordance with the Outline Landscape and Ecological Management Plan [REP3-030] secured under Requirement 4 of the 3.1 draft DCO [REP3 004].</p> <p>During operation, routine maintenance inspections will identify any vegetation growth that may compromise statutory safety clearances, the extent of which will be determined once detailed design and retention</p>	<p>ES the impacts on this location are reckoned, or, given that there appear to be feasible alternatives presented in the Design Development Report, where the relative harms of these alternative alignments are explicitly weighed against each other.</p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		measures are confirmed.		
Project development process - Consultation				
3.2.7	2022 non-statutory consultation	<p>Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report.</p> <p>5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]. The non-statutory consultation was undertaken in accordance with the published Consultation StrategyConsultation Strategy.</p>	NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.8	2023 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included in the Feedback Report5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069].</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.9	2024 statutory consultation	<p>Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in the Statement of Community Consultation (SoCC)5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and</p>	NCC agree that consultation was undertaken in accordance with the Statement of Community Consultation (SoCC)	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>supporting evidence [APP-071]. Responses to feedback received during statutory consultation are available within the 5.1 Consultation Report [APP-066].</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>		
3.2.10	2025 targeted consultation	<p>Targeted consultations for Norfolk took place from 30 January 2025 – 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are available within the 5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-066-077].</p> <p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy.</p> <p>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).</p>	NCC agree that consultation was undertaken in accordance with the Targeted Consultation Strategy	Agreed
Other matters as required				
3.2.11	Consideration of power delivery to Norfolk to support housing and	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the	NCC seek assurances from National Grid that in the event of an onshore option being taken forward there needed to be demonstrable benefits for Norfolk in terms of	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	employment growth	electricity that will be generated and connected to the electricity transmission network by 2030, while working to the required standards. The Project would benefit the UK as a whole, including local communities, by enabling the connection of new sources of renewable energy and in doing so provide greater energy security and resilience to the Norfolk energy network.	providing power to communities and business to support planned growth. As currently set out, the Project would see energy passing through the County with none of the energy being used in Norfolk (2024) National Grid should engage with both NCC and UK Power Networks as part of the above project to consider what opportunities there are to provide power to Norfolk; and what additional infrastructure may be needed to secure such benefits. It is felt that this should be undertaken in conjunction with the County Council's preparation of an Energy Plan; and National Grid should contribute towards the cost of such a Plan, particularly given that other major National Grid Projects are coming forward elsewhere in the Count	
3.2.12	Community benefits	<p>Socio-economic impacts on the local economy and the tourism sector are assessed in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.</p> <p>In addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its guidance on community funds for transmission infrastructure (DESNZ, 2025). The Applicant is committed to working with Ofgem, industry partners, local</p>	<p>NCC Response to Targeted Consultations (Feb 2025):</p> <p>National Grid have not addressed in this consultation round compensation for those residents and businesses adversely affected by the proposed project either during or after construction. It is understood that Government is still considering the wider compensation and community benefits arrangement needed to address the upgrading of the transmission network.</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.</p> <p>This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025) 14.. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA.</p> <p><u>The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. Later in spring 2026, the Applicant will begin consulting on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits.</u></p>		

3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in 6.2 Environmental Statement Chapter 2 (Key Legislation and Planning Policy Context) and Section 8.2 of [APP-126] of 6.8 Environmental Statement Chapter 8 (Ecology and Biodiversity) of the ES [AS-026].</p> <p>All relevant legislation, policy and guidance has have been identified and appropriately considered to inform the assessment.</p>	review Review	Under discussion
EIA – Approach and Methods				
3.3.2	Study area	<p>The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of 6.8 Environmental Statement Chapter 8 (Ecology and Biodiversity) of the ES [AS-026].</p>	NCC position pending review of the ES.	Under discussion
3.3.4	Assessment Methodology	<p>The assessment methodology was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion</p>	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[APP-297] received from the Planning Inspectorate.	Inspectorate.	
3.3.5	Survey Methodology	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	Agreed
3.3.5 3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026] . The key parameters and assumptions presented are considered appropriate.	NCC position pending review of the ES.	Under discussion
EIA – Baseline Conditions				
3.3.6 3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026] . The baseline conditions and receptors presented are considered appropriate. The recent designation of Meadow Wood Nature Reserve CWS has been noted. While not considered as a CWS in the ecological assessment, due to the designation of the site in March 2026 after submission of the development consent application, this area of woodland and grassland habitat have been included under the Habitats of Principal Importance (Section 41 of the Natural Environment and Rural Communities	NCC position pending review of the ES.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Act, 2006) ecological receptor and has been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].</p>		
EIA – Embedded, Standard and Additional Mitigation Measures				
<p>3.3.73.3 3.3.73.3 .8</p>	<p>Embedded mitigation</p>	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026] and set out in the 7.2 Outline Code of Construction Practice [REP3-025] and 7.4 Outline Landscape and Ecology Management Plan [REP3-030]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>In January 2025, National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment</p> <p>In May 2025, National Grid held a further meeting to discuss comments from an updated proposed mitigation for species outside the remit of Natural England.</p>	<p>NCC position pending review of the ES</p>	<p>Under discussion</p>
<p>3.3.83.3 3.3.83.3 .9</p>	<p>Standard mitigation</p>	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026] and set out in the Outline CoCP [document reference 7.27.2 Outline Code of Construction</p>	<p>NCC position pending review of the ES</p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Practice [REP3-025] [REP3-025] and 7.4 Outline Landscape and Ecology Management Plan [REP3-030]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>		
<p>3.3.93.3 .10</p>	<p>Additional mitigation</p>	<p>The consideration of additional mitigation measures areis presented in Section 8.6 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026] and set out in 7.2 Outline Code of Construction Practice [REP3-025] and 7.4 Outline Landscape and Ecology Management Plan [REP3-030] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Where updated pre-construction surveys are required, these have been set out within Section 6 of the 7.4 Outline Landscape and Ecological Management Plan [REP3-030]</p>	<p>NCC position pending review of the ES</p>	<p>Under discussion</p>
<p>EIA – Assessment Conclusions</p>				
<p>3.3.103. 3.11</p>	<p>Construction effects</p>	<p>The assessment of effects during construction is presented in Section 8.7 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026]. The assessment of effects during construction presented is considered appropriate.</p>	<p>NCC position pending review of the ES</p>	<p>Under discussion</p>
<p>3.3.113. 3.12</p>	<p>Operational (and maintenance) effects</p>	<p>The assessment of effects during operation (and maintenance) is presented in Section 8.7 of 6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity) of the ES [AS-026]. The assessment of effects during operation (and</p>	<p>NCC position pending review of the ES</p>	<p>Under discussion</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		maintenance) presented is considered appropriate.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
<u>3.3.123.3.13</u>	Outline CoCP	<p>The <u>7.2 Outline CoCP</u> <u>Code of Construction Practice [REP3-025]</u> includes all relevant construction related mitigation measures specified in <u>6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity)</u> of the ES [AS-026] and is appropriate for managing construction impacts from the Project.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	NCC is satisfied that the outline Code of Construction Practice (“OCoCP”) is written in line with the requirements of the model Construction Environmental Management Plan condition at D.4.1 of BS 42020:2013 (Biodiversity — Code of practice for planning and development).	Under discussion
<u>3.3.133.3.14</u>	Outline LEMP	<p>The <u>LEMP 7.4 Outline Landscape and Ecological Management Plan [REP3-030]</u> includes all relevant operational related mitigation measures specified in <u>6.8 Environmental Statement Chapter 8 (- Ecology and Biodiversity)</u> of the ES [AS-026] and is appropriate.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline LEMP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p>	NCC position pending review of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.</p>		
Other matters as required				
<p>3.3.143. <u>3.15</u></p>	<p>Biodiversity Net Gain (BNG)</p>	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. The<u>7.1 Biodiversity Net Gain Report [APP-299]</u> sets out the approach to BNG.</p> <p><u>For any BNG deficit offsite</u> Offsite-BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers.</p> <p><u>The reference to 12.5% of habitats being surveyed is incorrect. 97% of the Order Limits have been subject to full UKHAB and BNG condition surveys. This is considered a meaningful baseline to determine the BNG requirement of the Project.</u></p> <p>National Grid shared the Biodiversity Net Gain strategy with stakeholders in January 2025.<u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed</u></p>	<p>With regard to Biodiversity Net Gain (“BNG”), the project has stated that 12.5% of the habitats within the order limits have been assessed under the condition assessment. This should be increased to meaningfully contribute to the BNG assessment to generate a realistic BNG unit value</p>	<p>Under discussion</p>
<p>3.3.153. <u>3.16</u></p>	<p>Arboriculture Impact Assessment (AIA)</p>	<p>National Grid issued the draft AIA in March 2025<u>The AIA has been prepared in accordance with Appendix J of 6.19 Scoping Report - including appendices B to K [APP-296] and is considered appropriate for this stage of the project.</u></p>		<p>Under discussion</p>

3.4 Contaminated Land, Geology and Hydrogeology

Norfolk County Council’s positions throughout this table relate to minerals. NCC has no comments regarding Contaminated Land and Hydrogeology.

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid’s Position	Norfolk County Council’s Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in 6.2 Environmental Statement Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 9.2 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES [APP-181] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC position pending review of the ES.	Under discussion
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of 6.9 Environmental Statement Chapter 9 (Contaminated Land,	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.4.4	Assessment methodology	Geology and Hydrogeology) of the ES [APP-181].	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of 6.9 Environmental Statement Chapter 9 (- Contaminated Land, Geology and Hydrogeology) of the ES [APP-181]. The key parameters and assumptions presented are considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Under-discussion Agreed
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of 6.9 Environmental Statement Chapter 9 (- Contaminated Land, Geology and Hydrogeology) of the ES [APP-181]. The baseline conditions and receptors presented are considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES [APP-181] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES and set out in the Outline CoCP [document reference 7.2] [APP-181] and set out in 7.2 Outline Code of Construction Practice [(REP3-025)] The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 9.6 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES [APP-181] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable

EIA – Assessment Conclusions

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 9.7 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES[APP-181] . The assessment of effects during construction presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES[APP-181] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	<p>The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction mitigation measures specified in 6.9 Environmental Statement Chapter 9 (Contaminated Land, Geology and Hydrogeology) of the ES[APP-181] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Other matters as required				
3.4.13	Norfolk Minerals and Waste Local Plan	All policy included in the Environmental Statement was current as of 1 April 2025, to allow sufficient time to complete the appropriate assessments and draft the Planning Statement prior to submission of the DCO application. Noting NCC's updated Minerals Plan wasn't adopted until May 2025, we have included this plan in the 8.4.2 Policy Compliance Tracker , being [REP1-133] , submitted to the DCO examination at Deadline 1. National Grid can confirm that the updated Plans inclusion would not have affected the conclusions in the ES or its appendices.	NCC wrote to the applicant on 15 October 2025 to seek changes to Chapter 9 and Figure 9.3 of the Environmental Statement to reflect the fact that the Norfolk Minerals and Waste Local Plan ("NM&WLP") was adopted on 20 May 2025 and supersedes the policy which is quoted in the ES as submitted. This seems to us to be a straightforward factual correction so we trust that the applicant is willing to make the necessary changes.	<u>Under discussion</u>

3.5 Health and Wellbeing (including Air Quality and Noise and Vibration)

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in 6.2 Environmental Statement Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] , Section 10.2 of 6.10 Environmental Statement Chapter 10 (Health and Wellbeing) [APP-192] , Section 7.2 of 6.7	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
<p>Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.2 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>				
<p>EIA – Approach and Methods</p>				
3.5.2	Study area	<p>The study area was agreed through the EIA6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.5.3	Data sources	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.4 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.4 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES.</p>	<p>NCC confirmed their agreement on this matter during a call held February 2026.</p>	Agreed
3.5.4	Assessment methodology	<p>A meeting was held on the 24th24 September 2024 to agree the assessment methodology of the6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] of the ES- chapter.</p> <p>National Grid issued the Health and Wellbeing Technical Note—Refreshed Approach on the 9th October 2024.</p>	<p>NCC welcomes the applicant's assessment of mental health impacts and the use of the Mental Wellbeing Impact Assessment Toolkit (2011), which reflects comments made by NCC Public Health and other consultees earlier in the consultation process. The specific focus on perceptions of health risk associated with EMFs is also welcomed, again reflecting NCC Public Health's</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			<p>previous comments.</p> <p>NCC notes the assessment of impacts at ward level and the methodology used to identify ward vulnerability, which again reflects NCC Public Health's earlier comments. The explicit consideration of vulnerable groups is also supported.</p>	
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.4 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.4 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES. The key parameters and assumptions presented are considered appropriate.</p>	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.5 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.5 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES. The baseline conditions and receptors presented are considered appropriate.</p>	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.5.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.6 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.6 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>NCC advised during a call held in February 2026 that they do not consider this applicable for this topic.</p>	Not Applicable
3.5.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.6 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147], Section 14.6 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES and set out in the Outline CoCP [document reference 7.27.2 Outline Code of Construction Practice [REP3-025]]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>NCC advised during a call held in February 2026 that they do not consider this applicable for this topic.</p>	Not applicable
3.5.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 10.6 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192], Section 7.6 of 6.7 Environmental Statement Chapter 7 (- Air</p>	<p>NCC confirmed their agreement with regard to the proposed mitigation relating to EMF's during a call held February 2026.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Quality) [APP-147] and Section 14.6 of Chapter 14 (Noise and Vibration) [APP-1256] of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
EIA – Assessment Conclusions				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 10.7 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192] , Section 7.7 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.7 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES. The assessment of effects during construction presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing) [APP-192] , Section 7.7 of 6.7 Environmental Statement Chapter 7 (- Air Quality) [APP-147] and Section 14.7 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>mitigation measures specified in 6.10 Environmental Statement Chapter 10 (- Health and Wellbeing); [APP-192], 6.7 Environmental Statement Chapter 7 (- Air Quality) and [APP-147] and 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256] of the ES and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoGP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoGP.</p> <p>A further iteration of the Outline CoGP was issued in May 2025 following the meeting and feedback in writing.</p>		
Other matters as required				

3.6 Historic Environment

Comments on Historic Environment for Norfolk County Council relate to archaeology only.

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment

ID	Matter	National Grid’s Position	Norfolk County Council’s Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in 6.2 Environmental Statement Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 11.2 of 6.11 Environmental Statement Chapter 11 (Historic Environment) of the ES [AS-068].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
EIA – Approach and Methods				
3.6.2	Study area	<p>The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented	NCC advised they were in agreement with this matter during a meeting held in January	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		within Section 11.4 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [AS-068] .	2026.	
3.6.4	Assessment methodology	The methodology for assessing Historic Environment was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.5	Key parameters and assumptions	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [AS-068] . The key parameters and assumptions presented are considered appropriate. In February 2025, National Grid issued Historic Environments (HE) Viewpoints information and held a thematic group meeting on the topic. In March 2025, National Grid issued an updated version of the Historic Environment (HE) Viewpoints information.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [AS-068] . The baseline conditions and receptors presented are considered appropriate. February 2025, National Grid issued a draft Historic Baseline Report including Annex C and	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Annex D for agreement/comment and held a meeting on the topic.				
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [AS-068]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.6.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES and set out in the Outline CoCP [document reference 7.2 [AS-068] and set out in 7.2 Outline Code of Construction Practice[REP3-025]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.6.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 11.6 of 6.11 Environmental Statement Chapter 11 (- Historic Environment) of the ES [AS-068]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant proposes to update 7.5 Outline</p>	The matter will remain under discussion pending final agreement on the archaeological surveys.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England. <u>Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the Supplementary Environmental Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of Supplementary Environmental Information [AS-068 to AS-083]. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.</u></p>		
EIA – Assessment Conclusions				
3.6.10	Construction effects	<p>The assessment of effects during construction is presented in Section 11.7 of <u>6.11 Environmental Statement Chapter 11</u> (- Historic Environment) of the ES [AS-068]. The assessment of effects during construction</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		presented is considered appropriate.		
3.6.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 (Historic Environment) of the ES [AS-068] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC does not think this is applicable for archaeology archaeology .	Not applicable
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	<p>The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction mitigation measures specified in 6.11 Environmental Statement Chapter 11 (Historic Environment) of the ES [AS-068] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
Other matters as required				
3.6.13	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological	<p>National Grid shared overarching WSIs in March – June 2024 and December 2024.</p> <p>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered</p>	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	trial trenching.	appropriate and proportionate to the level of evaluation required.		
3.6.14	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p> <p>There are still addenda to site specific WSIs forthcoming that have yet to be issued.</p>	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.6.15	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required. National Grid issued the draft Outline AMS-OWSI for the post-consent stage of the project in April 2025.</p> <p>The Applicant proposes to update <u>is currently preparing an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review.</u></p>	This matter will remain under discussion pending sight of an updated version of the document.	Under discussion
3.6.16	Programme for completion of archaeological	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	fieldwork	<p>technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was completed at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>		
3.6.17	Supplementary Environmental Information	<p>NG <u>The Applicant has</u> sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>Given the comments provided it is understood that NCC <u>are</u> in agreement with the part of the note that sets out the approach to supplementary information that will be provided for the DCO examination.</p>		Agreed

3.7 Hydrology, Land Drainage and Flood Risk

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in 6.2 Environmental Statement Chapter 2 (- Key Legislation and Planning Policy Context)[APP-126] and Section 9.2 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC position pending review of the ES	Under discussion
EIA – Approach and Methods				
3.7.2	Study area	<p>The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221].</p>	NCC position pending review of the ES.	Under discussion
3.7.4	Assessment	The methodology for assessing Hydrology, Land	The methodology for assessing Hydrology,	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	methodology	Drainage and Flood Risk was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] . The key parameters and assumptions presented are considered appropriate.	NCC position pending review of the ES	Under discussion
EIA – Baseline Conditions				
3.7.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] . The baseline conditions and receptors presented are considered appropriate.	NCC position pending review of the ES	Under discussion
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to	NCC position pending review of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>address potential effects.</p> <p>Meeting took place in April 2026 to further discuss mitigation for surface water flood risk (linked to comments received on 8.2 Drainage Strategy DCO [REP1-072]).</p>		
3.7.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES and set out in the Outline CoCP [document reference 7.2 [APP-221] and set out in 7.2 Outline Code of Construction Practice [REP3-025]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC position pending review of the ES	Under discussion
3.7.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 12.6 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC position pending review of the ES	Under discussion
EIA – Assessment Conclusions				
3.7.10	Construction effects	<p>The assessment of effects during construction is presented in Section 12.7 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of</p>	NCC position pending review of the ES	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>the ES [APP-221]. The assessment of effects during construction presented is considered appropriate.</p>		
3.7.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 12.7 of 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	NCC position pending review of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP (including Flood Warning and Evacuation Plan)	<p>The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction mitigation measures specified in 6.12 Environmental Statement Chapter 12 (- Hydrology, Land Drainage and Flood Risk) of the ES [APP-221] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p> <p>Feedback received from NCC will be taken on board for the next iteration of the Outline CoCP.</p>	<p>The Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity on:</p> <ul style="list-style-type: none"> • Roles and responsibilities for signing up to warning services. • Use of third-party properties as evacuation points without confirmed agreements. • Availability and accessibility of emergency plans on site. • Monitoring triggers and decision-making processes during flood events. <p>NCC expects the plan to be aligned with Environment Agency and ADEPT guidance, with robust justification for any departures.</p>	Under discussion
Other matters as required				
3.7.13	Flood Risk	The draft FRA was issued to stakeholders in	Surface water flooding is inadequately	Under

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Assessment (FRA)	<p>January and March 2025.</p> <p>The scope, methodology, assessment and conclusions drawn in the FRA 7.9 Flood Risk Assessment [APP-331] are considered appropriate and proportionate.</p> <p>Comments received from the LLFA will be taken on board for the next revision of this document. The Applicant is engaging with the LLFA to discuss and resolve the comments provided on the Applicant's Drainage Strategy 8.2 Drainage Strategy DCO [REP1-072] submitted at Deadline 1, with a view to submitting a revision to the document at a future deadline.</p>	<p>considered (in contrast to fluvial and coastal risk) in the sequential test and the Flood Risk Assessment.</p> <p>The Environmental Statement and Flood Risk Assessment lack site-specific modelling, detailed drainage design annexes, and consistent application of stated methodologies.</p>	discussion

3.8 Landscape and Visual

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment Impact Assessment is presented in 6.2 Environmental Statement Chapter 2 (- Key Legislation and Planning Policy Context) [APP-126] and Section 13.2 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226].</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		All relevant legislation, policy and guidance has <u>have</u> been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.8.2	Study area	<p>A meeting was held on the 25 September 2024 to seek to agree the study area and discuss where changes had been proposed. A further meeting was held on the 27th November to follow up on any additional changes to the study area.</p> <p>The study area for the LVIA was agreed in the meeting held on 27th November 2024. <u>The Landscape and Visual study area is set out in Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</u></p>	The study area for the Landscape and Viewpoint Impact Assessment was agreed in the meeting held on 27th <u>27</u> November 2024.	Agreed
3.8.3	Data sources	<p>Sufficient desktop and survey data (<u>excluding viewpoints</u>) has been collected to inform the assessment as presented within Section 13.4 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES. [APP-226].</p> <p><u>The Applicant awaits further correspondence and will continue to engage with NCC on this matter.</u></p>		Under discussion
3.8.4	Assessment methodology (including LVIA methodology and viewpoints)	<p><u>The assessment methodology is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227].</u></p> <p>A meeting was held on the 25 September 2024 to seek to agree the detailed methodology. A-</p>	Assessment methodology for the LVIA was agreed in the meeting held on 27th <u>27</u> November 2024.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>further meeting was held on the 27th November to follow up on any additional changes to the study area.</p> <p>Assessment methodology for the Landscape and Viewpoint Impact Assessment was agreed in the meeting held on 27th November 2024. <u>The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. Visualisations are provided in 7.12 Visualisations [APP-343 to APP-351].</u></p>		
3.8.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual assessment <u>Impact Assessment</u> are summarised in <u>paragraph 13.4.20</u> in Section 13.4 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226]. The key parameters and assumptions presented are considered appropriate.</p> <p><u>The Applicant awaits further correspondence and will continue to engage with NCC on this matter.</u></p>	NCC position pending review of the ES.	Under discussion
EIA – Baseline Conditions				
3.8.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226]. The baseline conditions and</p>	NCC concludes that the LVIA baseline descriptions provided in the ES are broadly accurate, however some of the tranquillity of the Waveney Valley is understated in the ES narrative. During construction the effects are	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>receptors presented are considered appropriate.</p> <p><u>The Applicant has provided a response on the tranquillity of the Waveney Valley in Table 4.20, ID 11.15 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. The assessment has been reviewed in light of the comments made, and it is considered that the judgements made remain fair and reasonable and are not considered to understate the tranquillity of the Waveney Valley.</u></p> <p>National Grid note this position and will continue to engage with NCC on this matter. <u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</u></p>	<p>likely to be major adverse, and this cannot be overlooked in a landscape such as this.</p>	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out <u>measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and also Paragraphs 13.6.2 to 13.6.4 in Section 13.6 of 6.13 Environmental Statement Chapter 13 (Landscape and Visual) of the ES- [APP-226].</u></p> <p>Embedded mitigation is considered appropriate in terms of its nature and scale, to address potential effects.</p>	<p>It is noted that the applicant has sought to embed mitigation into the design process where possible, this is key in avoiding environmentally sensitive landscape and visual features and avoiding or reducing significant effects that may be experienced during construction and operation of the proposals.</p> <p>NCC advised they were in agreement with this matter during a meeting held in January 2026.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.8.8	Standard mitigation	<p><u>Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.</u></p> <p>Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES and set out in the [APP-226] and 7.2 Outline CoCP [document reference 7.2 Code of Construction Practice [REP3-025].</p> <p>The standard mitigation is considered appropriate, in terms of its nature and scale, to address potential effects.</p>	<p>NCC advised they were in agreement with this matter during a meeting held in January 2026.</p>	Agreed
3.8.9	Additional mitigation	<p><u>Additional mitigation comprises measures over and above any embedded and standard mitigation measures.</u></p> <p>The consideration of additional mitigation measures are presented in Section 13.6 of 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects [APP-226].</p> <p>National Grid note this position and will continue to engage with NCC on this matter. The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports</p>	<p>The applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. Whilst we understand how this position has been reached, and the embedded and standard mitigation already proposed, there is potential for improvement which will result in minimising some of the impacts and effects.</p> <p>The mitigation strategy is generic in approach and does not account for the varied landscape of Norfolk. Our strong view is that the mitigation package should be more ambitious so that it can better address the</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[REP2-030] and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10.	significant adverse residual effects and aim for enhancement.	
EIA – Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 (Landscape and Visual) of the ES [APP-226] . The assessment of effects during construction presented is considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 (Landscape and Visual) of the ES [APP-226] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC position pending review of the ES	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	<p>The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in 6.13 Environmental Statement Chapter 13 (Landscape and Visual) of the ES [APP-226] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was</p>	Matter still under discussion, NCC would like further time to consider the oCoCP.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>issued in May 2025 following the meeting and feedback in writing.</p> <p>National Grid will continue to engage with NCC on this matter.</p>		
3.8.13	Outline LEMP	<p>The7.4 Outline LEMP Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures specified in 6.13 Environmental Statement Chapter 13 (- Landscape and Visual) of the ES [APP-226] and is appropriate.</p> <p>Meetings held in October 2024 to agree on the structure for the Outline LEMP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline LEMP.</p> <p>A further iteration of the Outline LEMP was issued in May 2025 following the meeting and feedback in writing.</p> <p>National GridThe Applicant awaits further correspondence, and will continue to engage with NCC on this matter.</p>	Matter still under discussion, NCC would like further time to consider the oLEMP.	Under discussion

Other matters as required

3.9 Socio-economics, Recreation and Tourism

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in 6.2 Environmental Statement Chapter 2 (- Key Legislation and Planning Policy Context) [APP-126] and Section 15.2 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism)-of the ES [APP-265].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC position pending review of the ES	Under discussion Agreed
EIA – Approach and Methods				
3.9.2	Study area	<p>The 6.20 Scoping Opinion [APP-297] stated: “The Applicant should seek to agree the study area with the relevant local authorities”.</p> <p>A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>Following the meeting held in November 2024, it was the Applicant agreed that the study area for businesses would be expanded from 4km 1 km to 3km 3 km to take into account potential visual effects on businesses.</p> <p>A 3rd third Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	Email dated 10th 10 October 2024 confirmed that NCC were in agreement on the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note.	Agreed
3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented	NCC advised they were in agreement with this matter during a meeting held in February	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		within Section 15.4 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism)-of the ES [APP-265] .	2026.	
3.9.4	Assessment methodology	<p>The6.20 Scoping Opinion [APP-297] stated “The Applicant should seek to agree the study area with the relevant local authorities” and “The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities”.</p> <p>A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>A 3rdthird Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	Email dated 10th 10 October confirmed that NCC were in agreement with the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note.	Agreed
3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism)-of the ES [APP-265] . The key parameters and assumptions presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism)-	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>of the ES [APP-265]. The baseline conditions and receptors presented are considered appropriate.</p>		
<p>EIA – Embedded, Standard and Additional Mitigation Measures</p>				
3.9.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES [APP-265]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid notes the additional information which is required and will continue to engage regarding this matter. The Applicant's position on airfields is included in Section 3.17 'Safety and Security – Airfields' of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</p>	<p>This matter remains under discussion pending further information regarding airfields.</p>	Under discussion
3.9.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES [APP-265] and set out in the Outline CoCP [document reference 7.2 Outline Code of Construction [REP3-025]. The standard mitigation is considered appropriate and</p>		Under discussion A gree

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		adequate, in terms of its nature and scale, to address potential effects.		
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 15.6 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES [APP-265]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid notes NCCs position and will continue to engage regarding this matter. In <u>response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will engage with host authorities to inform the content of the Employment and Skills Plan.</u></p>	This matter remains under discussion pending further information regarding employment and skills plan.	Under discussion
EIA – Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of 6.15 Environmental Statement Chapter 15 (-	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Socio-economics, Recreation and Tourism) of the ES [APP-265]. The assessment of effects during construction presented is considered appropriate.</p>		
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES [APP-265]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>National Grid notes the additional information which is required and will continue to engage regarding this matterThe Applicant's position on airfields is included in Section 3.17 'Safety and Security – Airfields' of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	This matter remains under discussion pending further information regarding airfields.	Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	<p>The7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in 6.15 Environmental Statement Chapter 15 (- Socio-economics, Recreation and Tourism) of the ES. [APP-265] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p>	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>		
Other matters as required				
3.9.13	Employment and skills plan	<p>Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalent (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project.</p> <p>However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the</p>	<p>NCC request a project-specific Employment and Skills Plan to be developed and included within the DCO process, ensuring Visibility of local skills needs and training opportunities; Collaboration with local authorities, colleges, and training providers; Commitments to apprenticeships, work placements, and supply chain engagement; and Monitoring and reporting mechanisms aligned with local economic development priorities.</p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Community Funds for Transmission Infrastructure guidance.⁴In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will engage with host authorities to inform the content of the Employment and Skills Plan.</p>		

3.10 Traffic and Transport

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				

⁴~~Department for Energy Security and Net Zero (2025) Community Funds for Transmission Infrastructure.~~

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 16.2 of 6.16 Environmental Statement Chapter 16 (Traffic and Transport) of the ES [APP-271].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Approach and Methods				
3.10.2	Study area	<p>The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 16.4 of Chapter 16 (Traffic and Transport) of the ES [APP-271].</p> <p>Updated Position January 2026:</p> <p>Within the The 7.11 Transport Assessment [APP-333] a review of the collision data for the latest available three-year period (2021-2023) was undertaken for all roads on the local highway network that form the Primary Access Routes between the Project Site Access Points and includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (SRN). Where junctions connect to the SRN, a five-year period</p>	<p>Understood Position from <i>Relevant Representation November 2025</i> Local Impact Report February 2026:</p> <p>“Accident data referred to in the ES appear to date from 2019 (i.e. pre-covid). Given the observed changes to working and travelling patterns since covid, NCC would request that more recent data is used.” <u>“NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour.”</u></p>	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>(2019-2023) was assessed. The collision data obtained online from DfT used within the assessment has been provided for your review. Through further engagement a2019-2023). A review of the latest available collision data is beingincluding 2024 and 2025 has been undertaken to understand whether there are any changes to cluster sites atalong the junctions as well as along the PARs. National Grid on thePrimary Access Routes. The Applicant has and will continue to engage with NCCNorfolk County Council on this matter.</p> <p>Traffic data used within the 7.11 Transport Assessment [APP-333] and the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction. The Applicant has and will continue to engage with Norfolk County Council on the findings of this assessment.</p>		
3.10.4	Assessment methodology	<p>The methodology for assessing Traffic and Transport was outlined through the EIA6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p> <p>Updated Position (January 2026): A standalone PRoW chapter has not been</p>	NCC requested that a separate PRoW chapter should be provided in the ES. Refer to Section 3.11 PRoW.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>included in the Environmental Statement (ES) as PRoW related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRoW issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals. National Grid will continue to engage with NCC on this matter.</p> <p><u>In addition, the 7.6 Outline Public Rights of Way Management Plan [APP-329] has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project. This is developed as a standalone document and it is expected that the final PRoW Management Plan, to be developed by the Main Works Contractor ahead of the commencement of construction activities, will also be a standalone document.</u></p> <p><u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</u></p>		
3.10.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271]. The key parameters and assumptions presented are considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Baseline Conditions				
3.10.6	Baseline conditions	The baseline conditions and receptors for Traffic	<u>Understood Position from Local Impact</u>	Agreed <u>Und</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	and receptors	<p>and Transport are presented in Section 16.5 of 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271]. The baseline conditions and receptors presented are considered appropriate.</p> <p><u>The Applicant has undertaken a further review of the data sets for collisions and traffic data.</u></p> <p><u>The 7.11 Transport Assessment [APP-333] includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (SRN) (2019-2023).</u></p> <p><u>However, following engagement with National Highways further analysis was undertaken at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road and Site 12 A11 Thetford Bypass / A1066 Mundford Road SRN junctions for a full 60-month period excluding the period between March 2020 and September 2021, that is between January 2019 and June 2025. A review of the latest available collision data including 2024 and 2025 has also been undertaken along all Primary Access Routes within Norfolk to understand whether there are any changes to cluster sites.</u></p> <p><u>The Applicant confirms that traffic data used was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction.</u></p> <p><u>The Applicant has engaged with Norfolk County Council on this matter and the findings of this</u></p>	<p><u>Report February 2026:</u></p> <p>NCC confirmed agreement in their response to the first iteration of the SoCG. "NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour."</p>	er <u>Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>additional assessment will be submitted at Deadline 4.</u></p> <p><u>Following this review the baseline conditions and receptors presented are considered appropriate and the conclusions of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] remain valid.</u></p> <p><u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</u></p>		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in Section 16.6 of 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in Section 16.6 of 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271] and set out in the 7.2 Outline CoCP [document reference 7.2] [APP-300 Code of Construction Practice [REP3-025]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 16.6 of 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed

EIA – Assessment Conclusions

3.10.10	Construction effects	<p><u>The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction traffic through Diss at peak times when there may be an interaction with a greater number of sensitive receptors along PAR 8 such as schools as detailed within 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].</u></p> <p><u>The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion and delay at junctions along the A1066 through Diss as identified by the modelling presented within 7.11 Transport Assessment [APP-333].</u></p>	<p><u>Understood Position from Local Impact Report February 2026:</u></p> <p>NCC confirmed agreement in their response to the first iteration of the SoCG. <u>“NCC is concerned that the effect of exceeding junction capacity on PAR 8 will cause risks to road safety and worsen driver delay by a degree that is underestimated in the ES.”</u></p>	Agreed Under Discussion
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ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
<p>The assessment of effects during construction is presented in Section 16.7 (Residual Effects) of Chapter 16 (Traffic and Transport) of the ES [APP-271]. The assessment of effects during construction presented is considered appropriate. Based on the modelling, there is no predicted step change in junction performance at junctions along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during construction would not materially change or create additional safety risks due to the minimal increase in traffic.</p>				
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.11	Outline CoCP	<p>The 7.2 Outline CoCP [APP-300] Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in 6.16 Environmental Statement Chapter 16 (- Traffic and Transport) of the ES [APP-271] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October to agree on the structure for the 7.2 Outline CoCP [APP-300] Code of Construction Practice [REP3-025].</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.10.12	Policy and	The policy context, legislation and guidance	NCC confirmed agreement in their response	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	legislation	considered when undertaking the Traffic and Transport assessment is presented in Chapter 3 of the TA 7.11 Transport Assessment [APP-333] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	to the first iteration of the SoCG.	
Transport Assessment – Approach and Methods				
3.10.13	Study Area	The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within Section 2.21 (Transport Assessment Study Area) of the TA 7.11 Transport Assessment [APP-333] . The Study Area is considered appropriate for the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.14	Multimodal Strategy	A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within 7.11 Transport Assessment - Appendix G (Multi-Modal Transport Report) of the TA [APP-340] . The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.15	Junction Capacity	Preliminary junction capacity assessments have	NCC confirmed agreement in their response	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Assessment Methodology	<p>been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented Section 6.9 (Construction Traffic Assessment Methodology) of the TA7.11 Transport Assessment [APP-333]. This involved a preliminary assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required.</p> <p>The capacity assessment methodology used is considered appropriate.</p>	to the first iteration of the SoCG.	
3.10.16	Junction Modelling	<p>The methodology used for undertaking junction assessments is presented in Section 6.9 (Construction Traffic Assessment Methodology) of the TA7.11 Transport Assessment [APP-333]. The assessment methodology used is considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.17	Assessment of WCH	<p>The assessment of WCH impacts as a result of the Project is presented in Section 7.4 (Walkers, Cyclists and Horse riders network) of the TA7.11 Transport Assessment [APP-333]. This is based on the assessment undertaken within Section 16.7 (Residual Effects) of the ES- [APP-271] and Appendix 16.4: Traffic and Transport Construction Effects of 6.16 Environmental Statement Chapter 16 - Traffic and Transport (document reference [APP-271] and 6.16.A4) Environmental Statement</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The assessment methodology used is considered appropriate.</p>		
3.10.18	Impact on Parking	<p>The methodology for the assessment of impacts to on-street parking is presented within Section 6.5 (on Street Parking) of the TA 7.11 Transport Assessment [APP-333]. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed
3.10.19	Road Safety	<p>An The methodology for the assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as is set out in Section 4 (Existing Baseline Transport Conditions) of the TA 7.11 Transport Assessment [APP-333]. Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics.</p> <p>Areas where potential road safety issues have been identified, as set out within Section 7 (Transport Assessment) of the TA 7.11 Transport Assessment [APP-333], will be highlighted within the Driver's pack as part of mitigation measures secured within the 7.3 Outline CTMP (document reference 7.3)-</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>[APP-309 Construction Traffic Management Plan [REP3-028]]-</p> <p>The assessment methodology used is considered appropriate.</p>		
Transport Assessment – Mitigation Measures				
3.10.20	Mitigation Measures	<p>Mitigation measures include embedded, standard and additional mitigation identified within Section 2 (Project Description) of the TA [APP-333] and as reported within Section 16.6 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. This includes the Outline CoCP (document reference 7.2) [APP-300], Outline CTMP (document reference 7.3) [APP-309] and additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate.</p> <p><u>The 7.3 Outline Construction Traffic Management Plan [REP3-028] 2.4.4 has been updated to clarify:</u></p> <p><u>"Other works on the public highway, this could include:</u></p> <ul style="list-style-type: none"> <u>- Cutback/clearance of vegetation</u> <u>- Utility diversion works in the locations of bellmouth accesses</u> <u>- Use of stop/go boards instead of temporary traffic lights</u> <u>- Construction of the highway mitigation measures, or site access points, or haul road</u> 	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p><u>NCC's comment was raised on item 2.4.4 of the draft CTMP: "other works on the public highway – clarification required". NCC confirmed their agreement with National Grid's response to their comments in February 2026.</u></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
<p><u>crossing points"</u> NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>				
<p>Transport Assessment – Baseline Conditions</p>				
3.10.21	Policy and Legislation	<p>The policy context, legislation and guidance considered when undertaking the Transport Assessment is presented in Chapter 3 (Key Planning Policy Context) of the TA7.11 <u>Transport Assessment [APP-333]</u>. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.22	Baseline conditions	<p>The baseline conditions and sensitive receptors for Traffic and Transport are presented in Section 4 (Existing Baseline Transport Conditions) of the TA7.11 <u>Transport Assessment [APP-333]</u> and are considered appropriate. <u>The Applicant has undertaken a further review of the data sets for collisions and traffic data.</u> <u>7.11 Transport Assessment [APP-333]</u> includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (SRN) (2019-2023). However, following engagement with National Highways further analysis was undertaken at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road and Site 12 A11 Thetford Bypass / A1066 Mundford Road SRN junctions for a full 60-month</p>	<p><u>Understood Position from Local Impact Report February 2026:</u> NCC confirmed agreement in their response to the first iteration of the SoCG. <u>"NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour."</u></p>	Agreed <u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>period excluding the period between March 2020 and September 2021, that is between January 2019 and June 2025. A review of the latest available collision data including 2024 and 2025 has also been undertaken along all Primary Access Routes within Norfolk to understand whether there are any changes to cluster sites.</p> <p>The Applicant confirms that traffic data used was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction.</p> <p>The Applicant has engaged with Norfolk County Council on this matter and the findings of this additional assessment will be submitted at Deadline 4.</p>		
Transport Assessment – Future Baseline Conditions				
3.10.23	Growth Factors	<p>The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in Chapter 5 (Future Baseline) of the TA7.11 Transport Assessment [APP-333]. Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.24	Cumulative Developments	The committed developments included within the cumulative assessment for the future baseline	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>year are presented in Chapter 5 (Future Baseline) of the TA7.11 Transport Assessment [APP-333]. These have been derived through a review of local authority planning portals, information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.</p>		
Transport Assessment – Trip Generation				
3.10.25	Key Assumptions	<p>Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of 6.16 Environmental Statement Chapter 16 (Traffic and Transport) of the ES [APP-271] and Section 6.7 of Chapter 6 of the TA7.11 Transport Assessment [APP-333]. The key assumptions presented are considered appropriate.</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed
3.10.26	Methodology	<p>The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of the TA7.11 Transport Assessment [APP-333] is considered suitable and robust.</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed
3.10.27	Construction Vehicle Trips	<p>Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	Agreed

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		<p>is presented in Section 6.3 (Construction Vehicles Overview) of the TA7.11 Transport Assessment [APP-333]. The trip generation is considered appropriate.</p>		
3.10.28	Construction Workforce Trips	<p><u>The total peak number of construction workers that will be on the Primary Access Routes (PAR) within the county of Norfolk is estimated to be 250. This is NOT the total per PAR.</u></p> <p>Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.4 (Construction Staff Overview) of the TA [APP-333].</p> <p>An Outline Construction Workers Travel Plan (CWTP) [APP-311] has been prepared as part of the DCO application and is contained as an appendix within the Outline CTMP (document reference 7.3) [APP-309]. The Outline CWTP will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate.</p> <p>NCC comments are noted, and National Grid will continue to engage with NCC on this matter. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p><u>NCC's comment on this topic was as follows: "Norfolk Construction Workers Peak of 250+ - is this over the whole route of certain locations?" NCC confirmed their agreement with National Grid's response to their comments in February 2026.</u></p>	Under Discussion
Transport Assessment – Conclusions				
3.10.29	Overall impact of the Project	The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>the TA- 7.11 Transport Assessment [APP-333]. The National Grid considers the conclusions are considered to be appropriate whilst noting that NCC has outstanding comments on Diss.</p>		
Outline Construction Traffic Management Plan (CTMP)				
3.10.30	Project Team Roles and Responsibilities	<p>The Project Teams Roles and Responsibilities are set out in Section 3 of the 7.3 Outline CTMP [APP-309]. Construction Traffic Management Plan [[REP3-028] These are considered to be clear and sufficient for the delivery of the Project.</p> <p>Updated Position January 2026:-</p> <p>NCC did not raise any comments related to Project Team Roles and Responsibilities (Section 3) in the draft CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [APP-309] REP3-028 was updated as part of the DCO submission in August 2025.</p>	No comments	Agreed
3.10.31	Pre-and Post Construction Surveys	<p>The 7.3 Outline Construction Traffic Management Plan [REP3-028] section 5.2.2 notes that the scope of these surveys (including methodology) will be agreed with each Local Highway Authority. The presence of a highway representative or area engineers is anticipated to form part of discussions on the scope of the surveys.</p> <p>Details of the proposed Pre and Post Construction surveys are set out in Section 5.2 of the Outline CTMP [APP-309] and connect to the mitigation measures detailed within the Outline Code of Construction Practice</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>NCC's comment was raised on items 5.2.2 and 5.2.3 of the draft CTMP: "Highway Representatives or area engineers to be present during surveys?"</p> <p>NCC confirmed their agreement with National Grid's response to their comments in February 2026.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>(eCOCP) [APP-300]. These pre- and post-construction surveys are considered appropriate for the Project. NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
3.10.32	Traffic Management Measures	<p>Details of the proposed traffic management measures are set out in Section 5.8 of the 7.3 Outline CTMP [APP-309]. Construction Traffic Management Plan [REP3-028] These traffic management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts.</p> <p>Updated Position January 2026:-</p> <p>NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft Outline CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [APP-309REP3-028] was updated for the DCO submission in August 2025. Section 5.8 of the updated document details that the exact management, timings and locations of the proposed traffic management will be discussed and agreed with the Local Highway and Street Authorities. The Traffic Management will be secured through the use of Permit Schemes for each Local Highway Authority, where direct liaison is required.</p>	<p>Understood Position from Relevant Representation November 2025: <i>“The promoter should liaise directly with stakeholders on traffic management and mitigation.”</i></p>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.33	Implementation/ Enforcement	<p>The implementation and enforcement process set out in Section 6 of the 7.3 Outline CTMP- [APP-309 Construction Traffic Management Plan [REP3-028] is considered to be appropriate and adequate for the Project.</p> <p>Updated Position January 2026:</p> <p>NCC did not raise any comments related to implementation and enforcement process set out in Section 6 of the draft Outline CTMP (May 2025). The 7.3 Outline CTMP- [APP-309 Construction Traffic Management Plan [REP3-028] was updated for the DCO submission in August 2025.</p>	No comments	Agreed
Outline Construction Workers Travel Plan (CWTP)				
3.10.34	Policy	<p>The Policy Review (Section 3) within the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311] has been updated to detail that the policies listed are normally in reference to development sites but have been used as indicative guidelines for the development of the Outline CWTP. For each section of policy, a comment has been added to detail what has been taken from it, to inform the Outline CWTP.</p> <p>The policy context, including legislation and guidance considered in the development of the document is set out in Section 4 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). All relevant legislation, policy, and guidance have been identified and appropriately</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>NCC's comment was raised on items 4.3.5 and 4.3.6 of the draft CWTP: "Local travel plans for developments not NSIPS, DCO and CWTP will cover this".</p> <p>NCC confirmed their agreement with National Grid's response to their comments in February 2026.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>considered to inform the Outline CWTP. The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 3 (Policy Review) of the Outline Construction Worker Travel Plan [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
3.10.35	Site Accessibility Review	<p><u>Table 4.1 has been updated within the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311] to remove "bus" as an access option for Norwich Substation due to the criteria detailed in 4.2.2. For clarity, this was previously Table 5.1 in the draft CWTP (May 2025).</u></p> <p>The Site Accessibility review is captured within Section 5 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). This review is appropriate for the Project.</p> <p>The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 4 (Site Accessibility) of the CWTP [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant is continuing discussions with NCC with regards to the provision of a minibus service for the site near Dunston Hall and Norwich Substation.</u></p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>Updated Position February 2026: Under discussion – could a minibus be provided and parking off -site (P&R / Dunston Hall) be provided?</p>	Under Discussion

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3.10.36	Targets, Strategy, and Measures	<p><u>The 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]</u> has been updated to include measures for monitoring the targets set. As set out in Section 8.2.2 of the Outline CWTP the modal split information will be used to monitor travel choices to and from site. The information on the Travel Plan targets will be sent to the relevant Local Highway Authorities at regular intervals (anticipated to be quarterly) in the form of a monitoring review report.</p> <p><u>The 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311]</u> 7.2.7 details "Prior to construction the TPC will work with the relevant LHA travel planning teams to identify whether site worker discounted bus and travel tickets can be applied for to encourage more staff to travel by public transport". The Travel Plan Coordinator will look into options for travelling via public transport and what measures may be required; this could include a mini-bus or shuttle service from local public transport hubs. Further detail will be included in the updated Construction Worker Travel Plan to be developed by the Main Works Contractor.</p> <p>Targets are set out within Section 6 of the Outline CWTP [APP-311] (Appendix B of the Outline CTMP). Strategy and Measures are set out within Section 8 of the CWTP [APP-311]. The construction targets set out are considered to be relevant and achievable, given the present</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p><u>NCC raised comments on item 8.2.2 of the draft CWTP: "60% of workers share transport, how will this be captured/monitored.", and on item 7.2.7 of the draft CWTP: "Public transport but needs to be close to locations, if not how do workers get from stop to site Mini-bus shuttle runs?"</u>.</p> <p><u>NCC confirmed their agreement with National Grid's responses to their comments in February 2026.</u></p>	Under Discussion

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		<p>stage of Project development.</p> <p>The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project.</p> <p>The Outline CWTP [APP-311] was updated for the DCO submission in August 2025. This matter is discussed in Section 5 (Targets) and Section 7 (Travel Plan Strategy and Measures) of the Outline CWTP [APP-311]. NCC comments are noted, and National Grid will continue to engage with NCC on this matter.</p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
3.10.37	Monitoring and Review	<p>The proposed monitoring and review process is set out in Section 98 of the 7.3 Outline CWTP Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311] (Appendix B of the Outline CTMP). This is considered to be suitable and appropriate, given the present stage of Project development.</p> <p>Updated Position January 2026:</p> <p>NCC did not raise any comments related to Monitoring and Review (Section 9) of the draft Outline CWTP (May 2025). The CWTP was updated for the DCO submission in August 2025. This matter is discussed in Section 8 (Monitoring and Review) of the 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan</p>	NCC to review the updated Outline Construction Worker Travel Plan [APP-311] submitted in August 2025.	Under Discussion

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		<p>[APP-311]. National Grid will continue to engage with NCC on this matter.</p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
Construction Access Strategy and Design				
3.10.38	Construction Access Approach	<p>The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within Section 5 of the <u>7.3 Outline CTMP [APP-309] Construction Traffic Management Plan Plan [REP3-028]</u> This approach is considered to be suitable for construction traffic for the Project.</p> <p>Updated Position January 2026:-</p> <p>National Grid anticipates<u>confirms</u> that access to the pylons throughout the construction will be via the Primary Access Routes, and the haul roads, following the routeing strategy detailed in the <u>7.3 Outline CTMP [APP-309] Construction Traffic Management Plan Plan [REP3-028]</u> .</p> <p>The use of haul routes is the favourable solution for access as described in the General Construction Routeing Strategy (Section 5.4) of the <u>7.3 Outline CTMP [APP-309] Construction Traffic Management Plan Plan [REP3-028]</u>. This strategy reduces the number of site access points on the public highway network.</p> <p>Maintenance access during the operational phase will be via existing field accesses. Access</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p><i>Understood Position from Relevant Representation November 2025:</i></p> <p><i>"We require clarification as to whether temporary access to pylons during construction will be directly from the highway network or via haul routes. We also require clarification as to whether maintenance access during the operational phase will be through existing field accesses or whether new access points are required."</i></p> <p><i>"NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic."</i></p>	Under Discussion

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		<p>would typically be made on foot, by 4x4 or by tractor and trailer. Further details on operation and maintenance access can be found within the Application Document 6.4 Environmental Statement (ES) Chapter 4: - Project Description (Section 4.10) [APP-130].</p> <p>NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
3.10.39	Primary Access Route Selection	<p>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Indicative Highway Mitigation Plans within <u>in 7.3 Outline Construction Traffic Management Plan Appendix C of the Outline CTMP Indicative Highway Mitigation Plans</u> [APP-312 to APP-320 inclusive]. These have been discussed with NCC during regular engagement meetings since September 2023. These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the <u>7.3 Outline CTMP Construction Traffic Management Plan</u> [APP-309 REP3-028].</p> <p>Updated Position (January 2026):</p> <p>Responses are provided below for each location raised:</p> <p>A140 Ipswich Road (Link PAR 1)</p> <p>Within the <u>6.16 Environmental Statement (ES) Chapter 16 - Traffic and Transport</u> [APP-271] only the section of <u>the</u> A140 Ipswich Road</p>	<p><i>Understood Position from Relevant Representation November 2025:</i></p> <p><i>"NCC have highlighted several routeing constraints:</i></p> <p><i>The A140 Ipswich Road (Link PAR 128) has a weight restricted railway bridge south of the access, which must be treated as a highway restraint. PAR 1 (A140 Ipswich Road) is part of the Major Road Network and therefore should be treated as a sensitive link."</i></p>	Under Discussion

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		<p>between the A147 road and Mangreen Lane needed to be assessed. The bridge over the railway is south of this location and therefore will not affect the sensitivity of Link PAR 1.</p>		
<p>3.10.40</p>	<p>Primary Access Route Selection</p>	<p>A140 Ipswich Road / Mangreen Lane National Grid notes the right-turn issues at A140 Ipswich Road and Mangreen Lane (Site 2). Within the 7.11 Transport Assessment [APP-333] the results of the junction capacity assessments at Site 2 identified the need for mitigation in the form of avoiding the AM peak hour due to the insufficient right turn capacity to accommodate predicted future year increased queues. The proposed highway mitigation at this junction is limited to vegetation clearance to achieve visibility splays, as shown in the Indicative Highway Mitigation Plans within 7.3 Outline Construction Traffic Management Plan Appendix C of the Outline CTMP - Indicative Highway Mitigation Plans [APP-312 to APP-320 inclusive]. B1134 Station Road / Long Row National Grid is coordinating with Network Rail to confirm the suitability of the level crossing on the B1134 Station Road for the HGV and Large Mobile Crane traffic required to deliver the Project. Network Rail have confirmed that the crossing is in good condition and agree in principle with its use during the project, provided that a topographical survey and a specific load model are provided by the Main Works Contractor in advance of any movements of All-</p>	<p>Understood Position from Relevant Representation November 2025: <i>The Highway Authority is aware of existing right turn issues at A140 Ipswich Road/Mangreen Lane (Site 2).</i> For PAR 7 (B1134 Station Road/Long Row), confirmation is required from Network Rail that additional traffic is acceptable. Due to the sensitivity of the road link (referred to as PAR 829) HGV traffic should not travel via Diss on the A1066. Instead, traffic should be routed via PAR 9, which connects the same pylon construction areas to the A11. LGVs should also avoid the A1066 because RG56 will operate as a satellite compound. There is a recorded pedestrian collision on PAR 8 which highlights our concerns with using this route.</p>	<p>Under Discussion</p>

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		<p>vehicles.</p> <p>A1066 at Diss (PAR 8)</p> <p>Discussions are ongoing, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss.</p>		
3.10.41	<u>Primary Access Route Selection</u>	<p><u>B1134 Station Road / Long Row</u></p> <p><u>Network Rail have confirmed that 'The track will have no limitations up to 250kN wheel load on each rail, assuming the track bed and track components are in good condition.'</u> The level crossing sits on the public highway and has been designed to accommodate typical highways movements such as HGVs. However, the contractor will undertake detailed structural assessments of the loading on the track components and the track panels to ensure suitable capacity for HGVs and the mobile Crane Abnormal Indivisible Load.</p>	<p><u>Understood Position from Local Impact Report February 2026:</u></p> <p><u>"At B1134 Station Road/Long Row (PAR 7), additional traffic cannot be assumed to be acceptable until Network Rail confirms capacity at the level crossing. Pending that, increased HGV movements may pose a safety risk and cause delays."</u></p>	<u>Under Discussion</u>
3.10.40 3.10.42	<u>Primary Access and Crossover Design Route Selection</u>	<p>The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in Schedule 9 – Access to Works of the Draft Development Consent Order [APP-056] and further shown in the Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-312 to APP-320 inclusive]. These locations are considered to be suitable for use by the proposed construction traffic as part of the Project.</p> <p>The designs of the proposed accesses in these</p>	<p><u>Understood Position from Local Impact Report February 2026:</u></p> <p><u>"NCC also seeks a commitment that all HGV traffic accessing the A1066 crossing point be routed via PAR 9, which both reduces safety risks and complies with EN-1's expectation that applicants reroute traffic to less-busy parts of the network where appropriate."</u></p> <p><u>NCC is concerned that there could be safety and driver delay implications to the applicant's proposed use of PAR 8 for heavy goods</u></p>	<u>Under Discussion</u>

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		<p>locations have been based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road Safety Audits (RSAs) have been undertaken for each proposed location, overseen by NCC. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with NCC as the Overseeing Authority.</p> <p><u>A1066 at Diss (PAR 8)</u></p> <p><u>The Applicant has undertaken an assessment on the proposed construction access strategy through and around Diss. PAR 8 was chosen as an access route due to the construction corridor being aligned with the A140, and other Primary Access Routes being routed off the A140. The Applicant anticipates that there will be deliveries that need to access the construction compound south of Diss and those off PAR 6. If HGVs were only to be routed via Thetford (PAR 9), they would be subject to a 103 km diversion, with an additional journey time of 1 hour to 1 hour 40 minutes in the peak periods, which would route vehicles on busy parts of the network inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (January 2024) states that any mitigation (including re-routing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option, would not comply with policy EN-1.</u></p> <p><u>Light goods vehicles are required to use the A1066 through Diss to access the haul road to</u></p>	<p><u>vehicles ("HGVs"), as many of the junctions on that route are already over capacity. The applicant proposes that the split in HGV traffic between PAR 8 and PAR 9 is 50:50 at off-peak times and 100% via PAR 9 during PAR 8's network peak hours. In NCC's view PAR 9 is more suitable for HGV traffic at all times due to capacity constraints and also the more urban character of the A1066 through Diss.</u></p> <p>NCC refers to comments raised on the draft CTMP shared in May 2025. NCC is concerned that the effect of exceeding junction capacity on PAR 8 will cause risks to road safety and worsen driver delay by a degree that is underestimated in the ES. Table A16.4.2 in ES Appendix 16.4 – Traffic and Transport Construction Effects shows an assessment that effects on driver delay for PAR 8 are not significant on the basis of magnitude of change. Where the comments in Table A16.4.2 indicate that effects on driver delay for PAR 9 have been adjusted down on the basis of detailed modelling, it is notable that a converse exercise has not been done for PAR 8. This is despite an acknowledged high receptor sensitivity and substantial effects on driver delay and capacity shown in the detailed modelling."</p>	

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		<p><u>the north of the River Waveney. There is a Main Site Compound to the south of Diss, where overhead line construction workers will be reporting for work, before travelling through Diss on the A1066 to access the haul road. If construction workers in LGVs are unable to travel along the A1066 through Diss, they will be required to drive an additional 1hr40minutes to access the haul road. This is unfeasible given that construction workers are expected to travel outside of peak hours. It is expected that these movements will be by crew vehicles carrying six, thus minimising the number of trips.</u></p> <p><u>The Applicant confirms that one collision involving a pedestrian was recorded on PAR 8 and was considered within the assessment undertaken within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].</u></p> <p><u>The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction traffic through Diss at peak times when there may be an interaction with a greater number of sensitive receptors along PAR 8 such as schools as detailed within 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273].</u></p> <p><u>The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase</u></p>		

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		<p><u>to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion at junctions along the A1066 through Diss as identified by the modelling presented within 7.11 Transport Assessment [APP-333].</u></p> <p><u>NCC is concerned that there could be safety and driver delay implications to the applicant's proposed use of PAR 8 for heavy goods vehicles ("HGVs"), as many of the junctions on that route are already over capacity. The applicant proposes that the split in HGV traffic between PAR 8 and PAR 9 is 50:50 at off-peak times and 100% via PAR 9 during PAR 8's network peak hours. In NCC's view PAR 9 is more suitable for HGV traffic at all times due to capacity constraints and also the more urban character of the A1066 through Diss.</u></p> <p>NCC comments are noted, and National Grid will continue to engage with NCC on this matter.<u>Based on the modelling, there is no predicted step change in junction performance at junctions along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during</u></p>		

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		<p><u>construction would not materially change or create additional safety risks due to the minimal increase in traffic.</u></p>		
3.10.43	<p><u>Construction Access and Crossover Design</u></p>	<p><u>The proposed strategy for providing access for the construction of the Project proposals is set out in 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] . This aligns with the position stated by Norfolk County Council through the proposed usage of a limited number of specified Primary Access Routes (PARs) and Site Access Points (SAPs) to access a construction corridor served by a largely continuous haul road along the length of the proposed alignment. Under this approach, construction traffic will be restricted to the designated PARs when not utilising main roads forming part of the Strategic Road Network (SRN) or Major Road Network (MRN). Adherence to these routes forms commitment T03 in 7.2 Outline Code of Construction Practice [REP3-025]. On this basis, interactions between construction traffic and local roads not part of the specified PARs will be limited to locations where construction traffic on the haul road crosses local roads.</u></p> <p><u>Preliminary designs for each of the site access points and crossover points have been developed and have been subject to the Road Safety Audit (RSA) process set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. The RSA process considers safety risks including turning conflicts and potential congestion at each</u></p>	<p><u>Understood Position from Relevant Representation November 2025:</u></p> <p><i><u>"NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic."</u></i></p> <p><u>Understood Position from Local Impact Report February 2026:</u></p> <p><i><u>"Construction access taken directly from rural roads would increase conflict points, introduce turning movements at unsuitable locations, and elevate risks to vulnerable road users. Use of haul roads is therefore critical to minimising highway safety impacts. Otherwise, the result would be additional congestion, turning conflicts, and safety risks on minor roads across rural Norfolk."</u></i></p> <p><u>Understood Position from SOCG Review Meeting January 2026:</u></p> <p><i><u>"NCC requests for the designs of proposed accesses to be sympathetic to the surroundings and appropriate for the construction traffic expected. NCC have highlighted previous experience of past projects that have established overdesigned accesses, leading to unnecessary additional work and further impacts to the surroundings</u></i></p>	<p><u>Under Discussion</u></p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>of the proposed site access points and crossover points. For those locations in Norfolk, the Applicant has engaged with Norfolk County Council as the Overseeing Authority in the development of these RSAs. 2.6.3 Design and Layout Plans - Traffic and Transport [APP-043] shows an illustrative site access point layout. The plans provide indicative details that the Main Works Contractor may consider while undertaking the detailed design of each site access point. The detailed design should be sympathetic to surroundings, meet safety, security and welfare requirements, and appropriately cater for the expected traffic movements.</u></p> <p><u>The Applicant proposes this matter is agreed.</u></p>	<p><u>throughout the construction period.”</u></p>	
<p>3.10.41 <u>3.10.44</u></p>	<p>Highway Mitigation Design</p>	<p>Mitigation measures proposed on the Public Highway are described in Section 5 of the <u>7.3 Outline CTMP [APP-309], Construction Traffic Management Plan Plan [REP3-028]</u> . and are further set out in the following DCO <u>3.1 Draft Development Consent Order [REP3-004]</u> Schedules [APP-056]:</p> <ul style="list-style-type: none"> • Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout. • Schedule 6, Part 2 - Streets Subject to Temporary Alteration of Layout. <p>These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Where measures have been identified which may require works outside of the Public Highway</p>	<p>No comments</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>(categorised as 'Red' mitigations under Section 5.9 of the 7.3 Outline CTMP-[APP-309] Construction Traffic Management Plan Plan [REP3-028]), specific designs have been developed for these locations. These designs were discussed with NCC during an engagement session in April 2025, and further to this, Stage 1 Road Safety Audits have been undertaken for each location, overseen by NCC. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with NCC as the Overseeing Authority.</p> <p>Updated Position (January 2026):-</p> <p>NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft CTMP (May 2025). The 7.3 Outline CTMP-[APP-309] Construction Traffic Management Plan Plan [REP3-028] was updated for the DCO submission in August 2025.</p>		
3.10.45	Traffic Management – core working hours	<p>Section 2.3 of the 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] includes a specific list of operations that may take place outside of the core working hours. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p>NCC raised comments on item 2.3.2 of the draft CTMP: “A large number of works are to be scheduled outside of core working hours”.</p> <p>NCC confirmed their agreement with National Grid’s responses to their comments in February 2026.</p>	Under Discussion
3.10.46	Traffic Management	<p>Section 2.3 of the 7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>includes more detail on the handling of Heavy Goods Vehicles travelling outside of the core working hours.</u></p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>	<p><u>NCC raised comments on item 2.3.1 of the draft CTMP: "happy with HGVs travelling outside working hours to get to site, but times/dates as per 2.3.1 to be clarified".</u></p> <p><u>NCC confirmed their agreement with National Grid's responses to their comments in February 2026.</u></p>	
<p>3.10.42 <u>3.10.47</u></p>	<p>Traffic Management</p>	<p><u>The 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] details that construction worker LGVs are assumed to travel before 7am and after 7pm, with 50% of the workforce leaving within the working day. Admin staff are assumed to work more "traditional" timings and may travel to site compounds within peak periods. The HGV activities which can take place outside core hours are detailed in Section 2.3 of 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] and Requirement 7(4) of Schedule 3 to 3.1 Draft Development Consent Order [REP3-004]. HGVs not associated with these activities will be restricted to the hours set out in Requirement 7(3) of Schedule 3 to 3.1 Draft Development Consent Order [REP3-004]</u></p> <p>Traffic Management measures proposed on the Public Highway are described in Section 5 of the Outline CTMP [APP-309] and further set out in Schedule 5 - Streets Subject to Streetworks of the Draft Development Consent Order [APP-056]. These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Approaches to Traffic Management were</p>	<p>NCC refers to comments raised on the draft CTMP shared in May 2025.</p> <p><u>NCC raised comments on item 5.4.13 of the draft CTMP: "LGV and HGVs outside peak hours".</u></p> <p><u>NCC confirmed their agreement with National Grid's responses to their comments in February 2026.</u></p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>discussed in principle during engagement session in June 2024, and further specific measures relating to highway mitigation design were discussed during an engagement session in April 2025.</p> <p>National Grid will continue to engage with NCC as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access and crossover design (ID-3.10.40), and highway mitigation design (ID-3.10.41).</p> <p>NCC comments are noted, and National Grid will continue to engage with NCC on this matter. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</p>		
3.10.48	<u>Traffic Management</u>	<p><u>The 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] no longer includes Image (Figure 5.1). National Grid has undertaken a review from a highways perspective of the Primary Access Routes following the conclusion of the trip generation and assessment. For Mangreen Lane, National Grid has identified a green mitigation measure (Constraint number A1 identified on Sheet 1 of the 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section A [APP-313]) where there is narrow width for design vehicles with poor visibility. The proposed mitigation is to cut back vegetation to increase</u></p>	<p><u>NCC refers to comments raised on the draft CTMP shared in May 2025.</u></p> <p><u>NCC raised comments on Image 5.1 of the draft CTMP: “Is Mangreen okay to take the additional 450 vehicles, as discussed cumulative impact with SEPDEP”.</u></p> <p><u>NCC confirmed their agreement with National Grid’s responses to their comments in February 2026.</u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>visibility around the bend. The priority junction with Mangreen Lane and A140 Ipswich Road has been assessed within the 7.11 Transport Assessment [APP-333], with mitigation proposed to avoid the AM peak and redistribute the flows across the off-peak periods.</u></p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>		
3.10.49	<u>Traffic Management</u>	<p><u>The 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] no longer includes the Image (Figure 5.3). National Grid has undertaken a review of the Primary Access Routes (PARs) from a highways perspective following the conclusion of the trip generation and assessment. The review assessed both the B1113 (PAR 4) and Fundenhall Road (PAR 6) as not sensitive. The total traffic increases on both PARs is below the 30% assessment threshold (IEMA Guidelines Rule 1).</u></p>	<p><u>NCC refers to comments raised on the draft CTMP shared in May 2025.</u></p> <p><u>NCC raised comments on Image 5.2 of the draft CTMP: "<i>Image 5.2 HA03 - Fundenhall/B1113 will these roads be able to take up 350 movements for 3 months.</i>"</u></p>	<u>Under Discussion</u>
3.10.50	<u>Traffic Management</u>	<p><u>The Applicant anticipates that the signage (additional details on types of signage are included within 7.3 Outline Construction Traffic Management Plan Plan [REP3-028] will be in place for as long as construction is taking place at RG56. Duration of signage will be discussed and agreed between Norfolk County Council and the Main Works Contractor.</u></p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>	<p><u>Although paragraph 16.5.35 of [APP-271] indicates collision rates are generally on par with national averages and Table 16.11 outlines mitigation (e.g., signage), clarification is requested on whether such measures will be maintained for the full operational period of RG56.</u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.51	<u>Traffic Management</u>	<p>The Applicant has developed <u>7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</u> in consultation with Norfolk County Council. <u>7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</u> details that it is expected that the Main Works Contractor(s) will monitor the number of construction vehicles accessing the site, with the potential for the data collected to be used for auditing. The monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which could cause material effects can be identified and discussed with the relevant Local Highway Authority where appropriate. HGV drivers not using the Primary Access Routes (PARs) and parking or waiting in inappropriate locations have been identified as matters for non-compliance, that would be investigated, and data recorded and issued quarterly to the Local Highway Authorities.</p> <p>The Applicant has undertaken a robust trip generation and assessment exercise for both the <u>Overhead Lines and Cables and Substation construction activities</u>. This has been calculated as a worst-case daily assessment, to be transparent in the expected trips along each construction route. This exercise allowed the traffic and environmental impact assessment to be completed on robust and credible trip generations across the whole construction programme and the results of these assessments are presented within <u>7.11 Transport Assessment [APP-333]</u> and <u>6.16</u></p>	<p><u>Understood Position from Local Impact Report February 2026:</u></p> <p><i><u>“Policy context</u></i></p> <ul style="list-style-type: none"> <i><u>• Paragraph 5.14.15 provides a framework for requirements which the SoS may attach to consents which would result in substantial HGV traffic. These requirements may:</u></i> <p><i><u>Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;”</u></i></p>	<u>Under Discussion</u>

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		<p><u>Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</u>. The Applicant has sought to provide the most up-to-date assessments, based on the design and construction programmes available at the time the assessments were completed, and they have had due regard to feedback from stakeholders, including the Local Highway Authorities, through the Traffic and Transport Working Groups. The Applicant has stated within <u>7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</u> : 'Given the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary'. The Applicant has also committed to monitoring and managing the Project's impact on the road network, as <u>7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</u> additionally states, 'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road Network/Major Road Network'. This monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which can cause material effect can be identified and discussed with the relevant Local Highway Authority when appropriate.</p>		
3.10.52	<u>Traffic Management</u>	<p>A detailed CTMP will be developed and approved by Norfolk County Council post consent under Requirement 4 of Schedule 3 of the <u>3.1 Draft Development Consent Order [REP3-004]</u> This</p>	<p><u>Understood Position from Local Impact Report February 2026:</u> <u>"Make sufficient provision for HGV parking, and associated high quality drive facilities"</u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Norfolk. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Suffolk will be significantly impacted. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site.</u></p> <p><u>HGV drivers parking or waiting on the highway in inappropriate locations, which could result in highway safety issues is defined as a matter of non-compliance and will be managed through the enforcement procedure detailed in 7.3 Outline Construction Traffic Management Plan Plan [REP3-028]</u></p>	<p><u><i>either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and"</i></u></p>	
3.10.53	<u>Traffic Management</u>	<p><u>The approach to using contingency routes in circumstances where traffic movements on the road network are disrupted or compromised (impacting the use of the agreed PARs and site access points) is detailed within 7.3 Outline</u></p>	<p><u>Understood Position from Local Impact Report February 2026:</u></p> <p><u><i>"Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption,</i></u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>Construction Traffic Management Plan Plan [REP3-028]</u>. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. The Main Works Contractor(s) will also utilise the website OneNetwork and liaise with National Highways and Norfolk County Council on any other planned disruption.</p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>	<p><u>in consultation with network providers and the responsible police force.</u></p>	
<p>3.10.43 <u>3.10.54</u></p>	<p>Traffic Regulation Orders and Temporary Traffic Regulation Orders</p>	<p>Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the<u>2.4 Traffic Regulation Order Plans (document reference 2.4)</u> [APP-025 to APP-032 inclusive], and set out in Schedule 13 of the draft DCO (document reference 3.1)<u>[APP-0563.1 Draft Development Consent Order [REP3-004]]</u>:</p> <ul style="list-style-type: none"> • Part 1 - Temporary Restriction of Waiting and Restriction of Speed. • Part 2 - Permanent Restriction of Waiting and Restriction of Speed. • Part 3 – Temporary Restriction of Access. • Part 4 – Temporary no Overtaking Order. <p>These are considered to be suitable and sufficient for the delivery of the Project.</p> <p>National Grid will continue to engage with NCC as the proposed TROs and TTROs are developed further, including through the Road</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.44 <u>3.10.55</u>	Proposed Construction Access on the A1066 via Diss and Thetford	<p>Safety Audit process where these relate to proposed site access and crossover design (ID-3.10.40), and highway mitigation design (ID-3.10.41).</p> <p>This is noted by the applicant. The modelling results within the 7.11 Transport Assessment [APP-333] indicate that there will be an impact on capacity at junction sites 6-9 should traffic be routed through Diss during the peak hours and off peak periods. The overall daily (7am-7pm) traffic and transport construction effect along PAR 8 (A1066/A1066 Victoria Road/A1066 Park Road/A1066 High Road) is considered overall as slight and the not significant, as outlined within 6.16 Environmental Statement Appendix 16.4 - Traffic and Transport Effects [APP-275]. The total number of construction vehicles travelling through Diss along Link PAR 8 is less than a 10% increase when compared to future baseline, and existing facilities for sensitive receptors are already provided such as footways, pedestrian crossings, and off-carriageway cycle tracks. Any effects to driver or public transport passenger delay at junctions will be temporary in nature and standard mitigation is proposed within 7.3 Outline Construction Traffic Management Plan Plan [REP3-028]. The Applicant is committed to working with Norfolk County Council on this matter as part of ongoing engagement.</p> <p>National Grid have engaged with NCC around access proposals on the A1066 between Diss and Thetford. Following initial concerns raised by</p>	<p>Under discussion – pending further meeting to be held between NCC and NG.</p> <p>Understood Position from Relevant Representation November 2025:</p> <p><i>"Traffic counts at Sites 6-9 (Diss / A 1066 corridor) confirm NCC's concern with any routing via Diss during both AM and PM peaks. The LRN junction mitigation for Sites 6-10 has been discussed with NCC but is not accepted; with the flows in Tables 7.51, 7.54, 7.56, 7.58, 7.62, the evidence suggests adverse effects from any traffic using the A1066 via Diss."</i></p> <p><i>"In Table 5.9 of the outline CTMP, clarification is sought on Site 1 regarding whether congestion signs will be only on County roads or also on the A47 (Trunk Road); additionally, Sites 6–15 reference access via Diss, a route that has not been confirmed."</i></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>NCC around the use of the A1066 through Diss as a Primary Access Route, a study was undertaken into potential access arrangements for this area, and the findings were shared with NCC in July 2024.</p> <p>Further engagement has taken place around the anticipated traffic impacts on these routes in April 2025. Discussions are ongoing, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss, based on the results of traffic modelling undertaken.</p> <p>NCC comments are noted, and National Grid will continue to engage with NCC on this matter. <u>The Applicant anticipates that warning signage will be placed in appropriate locations to ensure the signs are visible to, and therefore warnings are heeded by, those who may be impacted. The Applicant will work with the affected local highway authorities to ensure the signs are placed in the correct locations. For Site 1, it is expected that signs will be located on the A47. With regard to Sites 6 to 15, an assessment of the impact of construction traffic has been completed on the roads through Diss and Thetford. Sites 6 to 15 are therefore included in Table 5.9 for completeness, as the Applicant's preference is for access through Diss. However, the Applicant will continue to discuss this matter with the Norfolk County Council.</u></p>		
3.10.45 3.10.56	Proposed Traffic Regulation Order	National Grid have engaged with NCC around the proposed Primary Access Route (PAR) on	<i>Updated Position from SOCG Review February 2026:</i>	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Closure of Wymondham Road	<p>Wymondham Road, west of Mulbarton. This route is shown as H01-A2 / H02-A1 on the 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans within Appendix C of the Outline CTMP [APP-313].</p> <p>For the section of this route on Wymondham Road south of the B1113, a temporary mitigation scheme has been developed to facilitate use of the road by construction traffic. This is detailed in Section 5.9 of the 7.3 Outline CTMP [APP-309] Construction Traffic Management Plan Plan [REP3-028] .This includes a Traffic Regulation Order (TRO) proposed to close the impacted section for the duration of use by construction traffic – with public traffic to be diverted via the nearby Flordon Road – as set out in the 2.4 Traffic Regulation Order Plans (document reference 2.4) [APP-025 to APP-032] and Schedule 13 of the draft DCO (document reference 3.1) APP-0563.1 Draft Development Consent Order [REP3-004] .:</p> <p>It is considered that this arrangement is suitable, and appropriate for the proposed construction access usage.</p> <p>Updated Position (January 2026):</p> <p>The results of the AM peak hour modelling assessment identified that the Project construction movements at the junction would have a marginal increase in the right turn queue length compared with the predicted future baseline with committed development flows. As such the speed limit reduction is considered</p>	<p>NCC is now satisfied with the proposed mitigation for right turning movements at the B1113/Wymondham Road junction.</p> <p>If any issues arise, these can be addressed as part of Section 5.9.10 of the CTMP.</p>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		appropriate mitigation for this junction anticipated short-term two-week peak activity.		
Abnormal Indivisible Load (AIL) Access				
3.10.46 3.10.57	Abnormal Indivisible Load (AIL) Access Approach	<p>The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within Section 5 of the 7.3 Outline CTMP [APP-309] Construction Traffic Management Plan [REP3-028] and further detailed within the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). A draft version of the AIL Access Strategy was shared with NCC in March 2025.</p> <p>This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.47 3.10.58	Abnormal Indivisible Load (AIL) Access Routes	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>These have been developed following consultations with NCC. As part of these consultations, draft route information was shared in July 2024 and April 2025. National Grid will continue to engage with NCC as the proposed AIL access routes are developed further, including with respect to the ongoing structural</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
<p>3.10.48 <u>3.10.59</u></p>	<p>Abnormal Indivisible Load (AIL) Structural Investigations</p>	<p>investigations.</p> <p>Routes proposed to be utilised by AILs are shown in the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). National Grid have been consulting with NCC in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by NCC in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>Engagement with respect to impacted structures is anticipated to be ongoing in parallel with the Development Consent Order process. It is understood that any Approvals in Principle secured at the current stage of project development do not remove requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out within Section 6 of the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP).</p> <p>This approach is considered to establish in principle that the proposed AIL deliveries</p>	<p>NCC confirmed agreement in their response to the first iteration of the SoCG.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>required for the Project are feasible, and that a suitable process is being undertaken in order to facilitate the anticipated formal AIL movement applications anticipated during construction of the Project.</p> <p>The AIL applications submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangements to accommodate the movements with minimal impact on the network.</p>		
3.10.49 3.10.60	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Indicative Highway Mitigation Plans within 7.3 Outline Construction Traffic Management Plan Appendix C of the Outline CTMP- Indicative Highway Mitigation Plans [APP-312 to APP-320]. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 3.10.413.10.44), and are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Management measures relevant to AIL movements are discussed within Section 5.9 of the 7.3 Outline CTMP [APP-309 Construction Traffic Management Plan Plan [REP3-028], and Section 6 of the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP). This approach, in principle, is</p>	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		considered to be suitable for ALL access for the Project at the current stage of project development.		

3.11 Public Rights of Way (PRoW)

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
PRoW Assessment Chapter				
3.11.1	PRoW Separate Chapter	<p>As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the Environmental Statement (ES).</p> <p><u>A standalone PRoW chapter has not been included in the Environmental Statement (ES) as PRoW related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRoW issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals.</u> Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within the cumulative ES chapter 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. This approach has been discussed with NCC at several meetings.</p> <p>Note that an 7.6 Outline Public Rights of Way</p>	NCC requested that a separate PRoW chapter should be provided in the ES.	<p>Not agreed</p>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Management Plan [APP-329] (item ID 3.11.3) has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project.</p> <p>Updated Position (January 2026): A standalone PRoW chapter has not been included in the Environmental Statement (ES) as PRoW related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRoW issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals.</p>		
3.11.2	Types of PRoW	<p>Types of PRoW intended to be considered as part of the Management Strategy were shared with NCC within Section 2.1 of the PRoW Methodology Statement document in April 2025. This list is considered to suitable, and no additional PRoW types are required to be captured. The PRoW types intended to be considered are:</p> <ul style="list-style-type: none"> • Formally designated PRoWs (footways, bridleways, restricted byways, and byways open to all traffic) • Permissive paths • Open access land • Cycle tracks, including the National Cycle Network • Other routes with public access. <p>This is set out in Section 4.42.4 of the Outline PRoW Management Plan.</p>	<p>NCC refers to comments raised on the draft PRoW Management Plan shared in May 2025.</p> <p><u>NCC raised comments on Section 2.4.1 of the draft PRoW Management Plan: "Surveys undertaken during the spring to be confirmed in the ES".</u></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Updated Position (January 2026):-</p> <p>NCC comments received on 18/06/25 regarding the draft PRow Management Plan have been addressed and incorporated as appropriate into the7.6 Outline PRow Management Plan [APP-329] submitted as part of the DCO Application, <u>specifically in the updated Section 2.4.</u></p> <p><u>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</u></p>		
3.11.3	Proposed Management Regime Approach	<p>The intended approach to management regimes to be considered as part of the Management Strategy were shared with NCC within Section 2.4 of the PRow Methodology Statement document in April 2025. This established the following hierarchy of management measures:</p> <ul style="list-style-type: none"> • PRowS to be kept upon existing alignments as a first preference, utilising management measures if required. • Where maintaining existing PRow alignments is not practicable, diversions along the shortest suitable route will be proposed. • Where no suitable diversion routes are identified, PRow closures will be considered as a last resort. <p>This is set out in Section 3 of the7.6 Outline PRow Public Rights of Way Management Plan: [APP-329]</p> <p>Updated Position (February 2026):-</p>	<p>NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.</p> <p><u>NCC raised comments on sections 3.1.2 and 3.1.6 of the draft PRow Management Plan: "Permanent stopping up would this not require a diversion or alternative route."</u></p>	Under Discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the 7.6 Outline PRow Public Rights of Way Management Plan [APP-329] submitted as part of the DCO Application; these can be seen in the updated Section 4.</p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</p>		
3.11.4	Routes with Public Access Affected by the Proposed Development	<p>Routes with public access affected by the proposed development are shown in the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]. Details of proposed management measures for each impacted route are shown in Section 4 of the 7.6 Outline PRow Public Rights of Way Management Plan [APP-329]. These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.11.3) set out above.</p> <p>Updated Position (February 2026):-</p> <p>NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the 7.6 Outline PRow Public Rights of Way Management Plan [APP-329] submitted as part of the DCO Application; these can be seen in the updated Section 6.</p>	<p>NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.</p> <p>NCC raised comments on section 5.1.1 of the draft PRow Management Plan: "all footpath's to be 1.5m minimum whether located at an field edge or not", and on section 5.2.1 of the draft PRow Management Plan: "condition surveys to be carried out with PRow or highway officers".</p>	Under- Discussion Agreed
3.11.5	Reinstatement	All PRow's impacted by construction works will	NCC refers to comments raised on the draft	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Approach	<p>be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with NCC PRoW Officers as well as impacted landowner(s).</p> <p>This is set out in Section 36 of the 7.6 Outline PRoW Public Rights of Way Management Plan [APP-329].</p> <p>Updated Position (February 2026):-</p> <p>NCC comments received on 18/06/25 regarding the Draft PRoW Management Plan have been addressed and incorporated as appropriate into the 7.6 Outline PRoW Public Rights of Way Management Plan [APP-329] submitted as part of the DCO Application.</p>	PRoW Management Plan shared in May 2025.	
3.11.6	<u>PRoW Surveys</u>	<p><u>Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] the rationale for selection of those PRoWs to be surveyed is provided. The list of PRoWs to be surveyed included routes likely to have a high number of users and extensive connectivity and/or social significance. The list of sites was shared with the local authorities in July 2024 and their feedback taken into consideration.</u></p> <p><u>At the time of arranging the PRoW surveys, the PRoWs that would be subject to diversion were not known, and therefore, Ashwellthorpe FP5, Forncett FP25 and FP26, and Roydon FP2 and FP4 were not surveyed. The number of users has not been a criterion for defining the sensitivity of PRoWs or the significance of effect,</u></p>	<p><u>Understood Position from Relevant Representation November 2025:</u></p> <p><u><i>“The Traffic and Transport Baseline Conditions appendix of the Environmental Statement currently only references Footpath 14 in Norfolk in relation to public rights of way (“PRoW”). This is an incomplete representation of the PRoW network affected by the proposed development. In addition to FP14, the following footpaths should be identified and assessed within the ES: Ashwellthorpe FP5; Forncett FP25 and FP26; and Roydon FP2 and FP4. These routes are of local importance and may be directly or indirectly impacted by construction activities.”</i></u></p>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p><u>as agreed in 6.19 Scoping Report - including appendices B to K [APP-296] for pedestrian, cyclist and horse-rider delay.</u></p> <p><u>Although user surveys were not undertaken for the above mentioned PRowS, they were all subject to review and assessment within both the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333]. This took into consideration the proposed management approach and timescales for these PRowS as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329].</u></p>		

3.12 Cumulative Effects

All matters relating to Cumulative Effects remain under discussion pending Norfolk County Council's review and assessment of the impacts of the project itself

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.12.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in 6.2 Environmental Statement Chapter 2 (Key Legislation and Planning Policy Context)[APP-126] and Section 17.2 of 6.17 Environmental Statement Chapter 17 (Cumulative Effects) of the ES [APP-281].</p>		Under discussion ^A <u>gree</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.12.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 of 6.17 Environmental Statement Chapter 17 (Cumulative Effects) of the ES [APP-281] .		Under discussion Agreed
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.4 of 6.17 Environmental Statement Chapter 17 (Cumulative Effects) of the ES [APP-281] . The key parameters and assumptions presented are considered appropriate.		Under discussion Agreed
EIA – Baseline Conditions				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of 6.17 Environmental Statement Chapter 17 (Cumulative Effects) of the ES [APP-281] .		Under discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>Cumulative Effects of the ES [APP-281]. The baseline conditions and receptors presented are considered appropriate.</p>		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.12.7	Embedded mitigation	<p><u>The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]</u>. Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Section 17.6 of Chapter 17 (Cumulative Effects) of the ES <u>Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]</u>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>		Under discussion
3.12.8	Standard mitigation	<p><u>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]</u>. Standard mitigation measures to reduce potential Cumulative Effects <u>effects</u> during construction are summarised in Section 17.6 of Chapter 17 (Cumulative Effects) of the ES and set out in the Outline CoCP [document reference 7.2] <u>Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]</u> and set out in <u>7.2 Outline Code of Construction Practice [REP3-025]</u>. The standard mitigation is considered appropriate and adequate, in terms</p>		Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		of its nature and scale, to address potential effects.		
3.12.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 17.6 of Sections 17.4 and 17.5 of 6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES [APP-281] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		Under discussion
EIA – Assessment Conclusions				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES [APP-281] . The assessment of effects during construction presented is considered appropriate.		Under discussion
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES [APP-281] . The assessment of effects during operation (and maintenance) presented is considered appropriate.		Under discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.12.12	Outline CoCP	The 7.2 Outline CoCP Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in 6.17 Environmental Statement Chapter 17 (- Cumulative Effects) of the ES		Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<p>[APP-281] and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>		

Other matters as required

3.13 Development Consent Order

Table 3.13 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the 3.1 Draft Development Consent Order [REP3-004].

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
3.13.1	<u>DCO Requirements – Construction management plans</u>	<u>The Applicant has removed the reference to “other discharging authority” in Requirement 4 (Construction management plans) to 3.1 Draft DCO (Revision C) [REP3-004] following deletion of the definition of discharging authority in Requirement 1 and has replaced the wording “in consultation with” by “following consultation with” to clarify that it is the relevant planning authority who is responsible for making and</u>	<u>NCC has requested a consequential change as a result of disambiguating the reference to “relevant planning authorities” in Requirement 4 (Construction management plans). This change resolves the ambiguity of which local planning authority is the “relevant planning authority” and further reduces ambiguity by removing references to any</u>	<u>Agreed</u>

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p><u>communicating its decision following consultation and that the decision does not rest with the consultee.</u> <u>The Applicant proposes this matter is agreed.</u></p>	<p><u>"other discharging authority as may be appropriate".</u> <u>This is enabled by introducing a new paragraph which sets out a relevant consultee for each plan and reserving the role of discharging authority for the relevant district planning authority</u></p>	
3.13.2	<u>DCO Requirements - Archaeology</u>	<p><u>The Applicant has removed the reference to "discharging authority" in Requirement 5 (Archaeology) to 3.1 Draft DCO (Revision C) [REP3-004] following deletion of the definition of discharging authority in Requirement 1 and has made amendments as to the need for the county planning authority to be a named a consultee in historic environment matters and to refer to Historic England as a consultee rather than a discharging authority.</u> <u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>	<p><u>NCC has requested a consequential change as a result of disambiguating the reference to "relevant planning authorities" in Requirement 5 (Archaeology).</u> <u>This change would reduce ambiguity by making the relevant district planning authority the discharging authority in all cases, including those in which Historic England are relevant. The proposed drafting requires consultation with the relevant county planning authority, because county planning authorities host specialist archaeological officers and maintain the historic environment record.</u> <u>NCC presume that Historic England would be relevant in cases affecting scheduled ancient monuments, but this isn't clear on the face of the order. NCC would ask the applicant to consider whether this should be set out explicitly. NCC's proposed change would make Historic England a consultee rather than a discharging authority to simplify discharging arrangements.</u> <u>If the applicant would prefer to retain Historic England as a discharging authority in certain</u></p>	Agreed

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
			<p><u>circumstances, NCC would request that the applicant propose an amendment which would make clear the circumstances in which Historic England are the discharging authority and which makes county planning authorities mandatory consultees.</u></p>	
<p><u>3.13.13.13.3 a</u></p>	<p>DCO Requirements – Construction hours</p>	<p><u>The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. Requirement 7 (Construction Hours) of the draft3.1 Draft DCO (Revision C) [APP-058REP3-004] provides that the proposed core working hours are 07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and other Public Holidays, unless alternative hours are approved by the relevant planning authority. Certain activities such as percussive piling and HGV deliveries are limited to these core working hours, unless different hours are approved by the relevant authority. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which</u></p>	<p><u>12.2 NCC asks that construction activities are limited to 07:00 to 13:00 on Saturdays and no activities taking place on Sundays and bank holidays, except for special operations agreed in advance with NCC as the local highway authority.</u></p> <p><u>12.3 Construction working patterns have a direct impact on network peaks so it is important that start up and close down activities are included in the controlled construction working hours.</u></p>	<p><u>Under discussion</u></p>

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</p> <p>The <u>construction working hours set out in 3.1 Draft DCO (Revision C) [REP3-004]</u> define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in <u>7.2 Outline Code of Construction Practice [REP3-025]</u></p> <p>The inclusion of Sundays and bank holidays within the defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays <u>bank holidays</u>. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption,</p>		

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		<p>seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</p> <p>A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop start working, and avoiding a longer prolonged overall construction period, which would itself result in greater long term longer-term exposure to construction impacts than occasional controlled working on those days. Such a restriction A blanket prohibition on Sundays / bank holidays would also undermine materially harm the deliverability of this critical national priority project, where timely delivery is in the public interest.</p> <p>Requirement 7 (5) of the draft DCO permits start up 6.14 Environmental Statement Chapter 14 - Noise and close-down Vibration [APP-256]</p>		

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>assessed the impact to take sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start-up and close-down activities taking place for an up to one hour either side of the core working hours. It is anticipated that the HGVs associated with start-up, and close-down activities will remain on-site and will be delivered and removed during the core working hours. The staff movements associated with the activities will be travelling outside of the core working hours, as they are expected to be on-site for 7am.</p> <p>which can The number of vehicle trips associated with the workforce have already been included within the assessment of traffic impacts, outside of the core working hours. The applicant anticipates that the majority of vehicles associated with start-up and close-down activities (with the exception of staff), will already be on-site.</p> <p>Requirement 7(4) of the draft permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong</p>		

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		<p>impacts. Works affecting highways, railways and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The inclusion of activities that may take place outside core construction hours is not an indication that construction would routinely occur throughout the day and night. It is not typical construction practice for work to continue on an extended or overnight basis as standard. Core construction activity is expected to take place within the defined working hours in the normal course of construction.</p> <p><u>The assessment concluded that with</u> importantly, any activities undertaken outside core construction hours remain subject to the <u>controls and embedded</u> mitigation measures and <u>controls</u> set out in <u>the 7.2 Outline Code of Construction Practice</u></p>		

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>[APP-300REP3-025], significant effects from noise and Outline Construction Traffic Management Plan [APP-300] vibration during the construction phase are not anticipated. These controls include provisions relating to noise management, lighting, environmental protection and monitoring, and construction traffic ensuring that any out of hours activity is appropriately managed and minimised. These <u>The measures set out therein will be secured via Requirement 4(1)(a) (Construction Management Plans) of the draft 3.1 Draft DCC (Revision C) [REP3-004] within the final CoCP and CTMP Code of Construction Practice.</u></p> <p>12.2 NCC asks that construction <u>The Applicant therefore considers the provision for start-up and close-down activities are limited and activities that can commence outside core working hours to 07:00 to 13:00 on Saturdays be proportionate, justified, and no activities taking place on Sundays and bank holidays consistent with established practice for Nationally Significant Infrastructure Projects, except for special operations agreed in advance with NCC as noting that all such activities remain subject to the local highway authority—</u></p> <p>application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out 12.3. <u>Construction working patterns have a direct impact on network peaks so it is important that</u></p>		

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>start up and close down activities are included in the controlled construction working hours- 42.4 The range of activities listed in the outline 7.2 Outline Code of Construction Practice [APP-300REP3-025] paragraph 2.2.6 (i) is the list of activities which may take place outside of core working hours) appears very broad, and its scope should be narrowed or clarified.</p>		
3.13.4	<u>DCO Requirements – Additional requirements</u>	<p><u>Commitment GG22 in 7.2 Outline Code of Construction Practice [REP3-025] secures that the Main Works Contractor(s) would prepare a Surface Water Management Plan. This plan would be substantially in accordance with 8.2 Drainage Strategy DCO [REP1-072], submitted at Deadline 1, and would demonstrate how runoff across construction work sites would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.</u></p> <p><u>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.</u></p>	<p><u>A request is made for the preparation of a surface water drainage or management plan. Note that this would require the applicant to produce an outline construction surface water drainage strategy before the end of the examination.</u></p>	<u>Under discussion</u>
3.13.5	<u>DCO Requirements – Additional requirements</u>	<p><u>As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in 8.9.1 Applicant's Responses to First Written Questions [REP3-074], the Applicant proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to</u></p>	<p><u>NCC's request to require an employment and skills plan. Note that this would require the applicant to produce an outline employment and skills plan before the end of the examination.</u></p>	<u>Under discussion</u>

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p><u>provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant will continue to engage with host authorities to inform the content of the Employment and Skills Plan.</u></p> <p><u>The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement in an update to 3.1 Draft DCO (Revision C) [REP3-004] when the Employment and Skills Plan is submitted at Deadline 5.</u></p>		
<p><u>3.13.23.13.6</u></p>	<p><u>DCO Wording Requirements Applications made under requirements</u></p>	<p>3.2 <u>The Applicant has incorporated draft protective provisions into had regard to feedback received from host authorities both on the draft DCO duration of the decision period and has sought engagement with relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process.</u></p> <p><u>the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on 3.3 and 3.4</u> The principle of deemed discharge provisions in relation to the discharge of</p>	<p><u>Schedule 4 (discharge of requirements)</u></p> <p><u>The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice Note Fifteen: drafting Development Consent Orders¹¹, which is 42 days or, preferably, 56 days accounting for the unusually high volume of NSIPs being handled in Norfolk.</u></p> <p><u>NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address'¹²) to be unconvincing given that longer periods are well precedented for other projects which also meet an urgent need as defined by NPS</u></p>	<p><u>Not agreed</u></p>

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>Requirements is not unique to this Project. The principle has precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. It is essential, ensuring that a project of this scale and critical national importance incorporates these deemed approval provisions to ensure that matters outside of the Applicant's control do not unnecessarily frustrate the delivery of the Project curtailed over bank holidays</p> <p><u>National Grid's position is</u> <u>The Applicant considers that a 28-day this revised decision making timeframe is period to be adequate,</u> proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. A decision period of 56 days would</p> <p><u>In each instance, The Applicant's position remains that extending the draft DCO allows for the relevant decision-making authority and the undertaker to agree "such other period" as may beyond what it proposes would not be proportionate or appropriate in given the circumstances.</u></p> <p><u>Project's programme constraints, The Applicant acknowledges the authority's position. The words "not nature of the applications proposed to be unreasonably withheld or delayed" are intended.</u></p>	<p><u>EN-1.</u></p>	

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>to account for instances where smaller or less contentious applications for consent have been submitted to the relevant authority to avoid unreasonable delays where decisions could reasonably be made within a shorter time period.</p> <p><u>made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</u></p> <p>Article 11 (street works) –</p> <p>3.2 Without a suitable highways side agreement in place (or agreed protective provisions) Nevertheless, article 11 there is scope within paragraph 1 (1) should be subject to the consent (c) of Schedule 4 (Discharge of Requirements) of the street authority. The same principle operates in relation</p> <p>3.1 Draft DCO (Revision C) [REP3-004] to articles: 14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way). Paragraphs (3) to (7) of article 11 may need consequential edits to apply to consents granted under paragraph (1) as well as under paragraph (2) –</p> <p><u>extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant</u></p>		

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>authority, and within paragraph 2 for the relevant authority to seek further information 3.3</p> <p>Paragraph (3) provides that consent is deemed to have been granted if the street authority does not notify the undertaker of its decision within 28 days. While NCC will do its best to deal with applications for consent as quickly as possible, 28 days is an unrealistically short timeframe in a context in which NCC is the street authority for a number of consented DCOs including the Hornsea Three Offshore Wind Farm Order4, the Norfolk Boreas Offshore Wind Farm Order5, the A47/A11 Thickthorn Junction DCO6, the A47 Blofield to North Burlingham DCO7, the A47 North Tuddenham to Easton DCO8, the Norfolk Vanguard Offshore Wind Farm Order, and the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order. In addition to consented projects, there are also ten proposed NSIPs in Norfolk at various stages of project development for which NCC expects to be a street authority.</p> <p>3.4 NCC resists 'deemed consent' provisions in general but considers that if deemed consent provisions are to be included, 56 days would be a more appropriate time limit. For the same reasons, we also request that 28 days is replaced with 56</p> <p>days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(3) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water);</p>		

ID	Matter	Norfolk County Council's Position National Grid's Position	Status Norfolk County Council's Position	Status
		<p>22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping);</p> <p>3.5 If deemed consent provisions are included, then NCC considers the requirement for consent not to be 'unreasonably withheld or delayed' is redundant. Besides which, NCC is already prevented from making decisions in an 'unreasonable' way <u>the Applicant and to consult with those required by the ordinary principles of public law</u> <u>the Requirement in question.</u></p>		
<u>Other matters as required</u>				

3.14 Other Matters

Appendix A

Draft DCO wording

Table A1 Norfolk County Council – Comments on the draft DCO

<u>ID</u>	<u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>			<u>Status</u>
			<u>Insertion/deletion or amendment</u>	<u>Proposed change</u>	<u>Explanation of change</u>	
1.	<u>DCO Wording – Relevant Planning Authority</u>	<u>The Applicant notes that the approach to defining the “relevant planning authority” is common across a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant has amended some of the provisions in the draft Development Consent Order to refer to the “relevant discharging authority”, which is defined in paragraph 1(1) of Schedule 3, however, the Applicant will consider fully NCC’s proposed drafting amendments (and consequential amendments on this point and whether these can be incorporated into the draft Development Consent Order at Deadline 3. This response also applies to Table 5-A – Consequential changes as a</u>	<u>Delete in paragraph (1) of article 2. Insert after definition of “provisional advance authorisation” in paragraph (1) of article 2.</u>	<u>“relevant county planning authority” means, in any given provision of this Order, the county planning authority for the area to which the provision relates; “relevant district planning authority” means, in any given provision of this Order, the district planning authority for the area to which the provision relates;</u>	<u>The meaning of “relevant planning authority” in the requirement is ambiguous. It is defined in article (1) as meaning “in any given provision of this Order, the local planning authority to which the provision relates”. Section 235 of the Planning Act 2008 gives “local planning authority” the same meaning as in the Town and Country Planning Act 1990. Section 1 of the Town and Country Planning Act 1990 states that references in the planning Acts to a local planning authority in relation to a non-metropolitan county</u>	<u>Agreed</u>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>			<u>Status</u>
	<p><u>result of disambiguating the referent of "relevant planning authorities", of NCC's Local Impact Report and so we do not repeat our comments there.</u></p>	<p><u>shall be construed, subject to any express provision to the contrary, as references to both the county planning authority and the district planning authorities.</u></p> <p><u>Because there is no express provision to the contrary in either the Planning Act 2008 or the draft DCO, the term "relevant planning authority" refers to both types of planning authority. NCC considers that this is imprecise and unhelpful and that the draft DCO should specify which local planning authority is meant in each instance.</u></p>			
<p><u>2. DCO Wording –Protective Provisions (Highways)</u></p>	<p><u>The Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [Revision C] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process and therefore</u></p>	<p><u>Insertion/deletion or amendment</u></p> <p><u>Amend paragraph (1) of article 11.</u></p>	<p><u>Proposed change</u></p> <p><u>(1) The undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter upon so</u></p>	<p><u>Explanation of change</u></p> <p><u>As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 11(1) should be subject to the consent of the street</u></p>	<p><u>Under discussion</u></p>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>			<u>Status</u>
	<p><u>at this stage it does not consider NCC's proposed amendments to the draft DCO to be necessary.</u></p>	<p><u>much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may without subject to the consent of the street authority which may attach reasonable conditions to any consent—</u> [...]</p> <p><u>authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority.</u> The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).</p>			
<p><u>3. DCO Wording – Reasonable Conditions</u></p>	<p><u>The Applicant notes NCC's request for consistency across those articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering the proposed updates to the 3.2 Draft Development Consent Order.</u></p>	<p><u>Insertion/deletion or amendment</u></p> <p><u>Amend paragraph (2) of article 11.</u></p>	<p><u>Proposed change</u></p> <p><u>(2) Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, which consent must not be unreasonably withheld or delayed and to which</u></p>	<p><u>Explanation of change</u></p> <p><u>The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b) but modified to fit the grammatical context.</u></p>	<p><u>Under discussion</u></p>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>			<u>Status</u>
		<p>consent the street authority may attach reasonable conditions, the undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at paragraph (1)(a) to (j) and paragraph (3) of article 8 (application of the 1990 Act) applies.</p>			
<p>4. <u>DCO</u> <u>Wording –</u> <u>Consent of</u> <u>Street</u> <u>Authority</u></p>	<p>The Applicant notes NCC's request for consistency across those articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering the proposed updates to the 3.2 Draft Development Consent Order.</p>	<p><u>Insertion/deletion or amendment</u></p> <p>Amend paragraph (4) of article 14. <i>(cont.)</i></p>	<p><u>Proposed change</u></p> <p>(4) The powers conferred by paragraphs (1) and (2) may not be exercised without the consent of the street authority, which may attach</p>	<p><u>Explanation of change</u></p> <p>As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 14(1) should be subject to the consent of the street authority. NCC cannot accept the grant of</p>	<p><u>Under discussion</u></p>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>			<u>Status</u>
			<p><u>reasonable conditions to any consent (such consent not to be unreasonably withheld or delayed).</u></p>	<p><u>powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority. The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).</u></p>	
<p><u>5. DCO Wording – Protective Provisions (Highways)</u></p>	<p><u>The Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [Revision C] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process and therefore at this stage it does not consider NCC's proposed amendments to the draft DCO to be necessary.</u></p>	<p><u>Insertion/deletion or amendment</u></p> <p><u>Amend paragraph (5) of article 16.</u></p>	<p><u>Proposed change</u></p> <p><u>(5) The undertaker must not temporarily close, alter or divert—</u> <u>(a) any street or public right of way specified as mentioned in paragraph (4); or</u> <u>(b) any other street or public right of way, without the consent of the street authority (such consent not</u></p>	<p><u>Explanation of change</u></p> <p><u>As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 16(5) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority. This change would mean</u></p>	<p><u>Under discussion</u></p>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>	<u>Status</u>
		<p><u>to be unreasonably withheld or delayed) which may attach reasonable conditions to any consent.</u></p> <p><u>that both (a) and (b) are subject to consent of the street authority.</u></p>	
<p><u>6.</u> DCO Wording – Closure of PRow</p>	<p>What might constitute a “reasonable time” will be specific to the particular facts in each<u>each</u> instance, therefore, a definition or clarification of what this might be in the draft DCO would be impractical and potentially imprecise. Information regarding the time for which PRowS will be temporarily closed and diverted is contained within the Outline PRow Management Plan [APP-329]. In summary, the strategy is to maintain access along PRowS at all times throughout the construction period, either through managing access along them on their existing alignment, or through provision of appropriate diversions. -The approach proposed for each affected PRow, and the indicative timescales involved, are detailed in Section 8 of the Outline PRow</p>	<p>Article 16 (temporary closure of streets and public rights of way)</p> <p>3.6 NCC considers that clarification is needed as to what might constitute a ‘reasonable time’ for the purpose of paragraph (1) of article 16, which enables the undertaker to ‘temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time—(a) divert the traffic from the street or public right of way; and (b) subject to paragraph (3), prevent all persons from passing along the street or public right of way.’ (emphasis added).</p> <p>3.7 Paragraph (5)(b) refers to the street authority’s ability to attach reasonable conditions to consents under article 16. For the avoidance of doubt, NCC considers that other provisions which provide for consents should also explicitly state that reasonable conditions may be applied (notwithstanding the earlier point that NCC may not lawfully behave unreasonably in any case).</p> <p>3.8 In addition, the Council considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.</p>	<p><u>Under discussion</u></p>

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>	<u>Status</u>
	<p>Management Plan [APP-329] and have been kept as short as possible within the constraints of the works being carried out that will affect them. National Grid's <u>The Applicant's</u> Main Works Contractor will further develop the construction programme during detailed design, and refined durations and closure dates will be communicated to Norfolk County Council as part of ongoing engagement.</p> <p><u>The</u> Applicant considers that the safeguards sought by Norfolk County Council in relation to both highway and PRow diversions are already secured through the draft-DCO3.1 Draft Development Consent Order [Revision C] and its relevant management plans.</p> <p>Under Requirement 4 of the draft-DCO3.1 Draft Development Consent Order [Revision C], the final PRow Management Plan and Construction Traffic Management Plan must be submitted to, and approved by, the relevant Local Highway Authority before works commence on any stage of the project. This approval process will include agreement of the details, sequencing and suitability of any</p>		

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>	<u>Status</u>
	<p>temporary diversions affecting streets or PRowS.</p> <p>For highways, the Outline Construction Traffic Management Plan [AppAPP-309] commits to coordinating all temporary traffic management with the relevant Local Highway Authorities through the use of the applicable Permit Schemes and/or Traffic Regulation Order or Temporary Traffic Regulation Order processes. These processes require diversion routes to be identified, appropriate and agreed with the highway authority in advance, thereby ensuring that suitable diversion arrangements are secured prior to any closure taking effect.</p> <p>For PRowS, the Outline PRow Management Plan [APP-329] commits to advance notification to the LHA PRow Officer for all temporary closures, identification of diversion routes where required, and provision of appropriate signage and management measures. These provisions ensure that diversion arrangements must be agreed and ready to implement before any closure is enacted. The Outline PRow Management Plan [APP-329] ase<u>also</u> commits to</p>		

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>	<u>Status</u>
	<p>reinstatement being completed to the reasonable satisfaction of the LHA<u>relevant highway authority's</u> PRow Officer.</p> <p>The inclusion in paragraph 5(b) of Article 16 of an express ability to attach conditions to a consent is because the streets or PRows referred to in that paragraph are not already identified in Schedule 8, hence the ability to attach conditions allows the relevant authority to bring any consents to these streets or PRows in line with the details for those agreed under the approvals processes referred to above.</p> <p>Taken together, the requirement for the relevant street authority's approval of the final Plans, the statutory procedures governing highway closures, and the commitments within the outline Plans ensure that no PRow or highway is temporarily stopped up, altered or diverted until suitable diversion arrangements have been agreed and can be made available. The Applicant therefore considers that Article 16 already provides adequate control and that no amendment is necessary.</p>		
<p>3. DCO — National Grid's position is that a 28- Schedule 4 (discharge of requirements)</p>			

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
4 3-4	Requirement s timescales	<p>day decision-making timeframe is proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. In each instance, the draft DCO allows for the relevant decision-making authority and the undertaker to agree "such other period" as may be appropriate in the circumstances. Likewise, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) [APP-056] to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority.</p> <p>The Applicant notes the authority's comment that longer periods are well preceded for on other projects which also meet an urgent need as defined by NPS EN-1, however, the Project is vastly different in nature and scale to many other of these projects, passing through 13 host local authorities.</p>	<p>3.9 The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice Note Fifteen: drafting Development Consent Orders¹¹, which is 42 days or, preferably, 56 days accounting for the unusually high volume of NSIPs being handled in Norfolk.</p> <p>3.10 NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address'¹²) to be unconvincing given that longer periods are well preceded for other projects which also meet an urgent need as defined by NPS EN-1.</p>	

<u>ID</u> <u>Matter</u>	<u>National Grid's Position</u>	<u>Norfolk County Council's Position</u>	<u>Status</u>
<p>7. DCO Requirements – protective provisions Working – Protective Provisions</p>	<p>The Applicant will continue to engage with relevant stakeholders on matters including the draft protective provisions.</p>	<p>Schedule 16 (protective provisions)</p> <p>3.11 NCC notes the inclusion of protective provisions for the protection of drainage and flood authorities (in part 3) and for the protection of the highway authorities (in part 4). Neither set of protective provisions have been agreed with NCC.</p> <p>3.12 In the case of the flood authority provisions, negotiations have been ongoing with the developer since August this year. In relation to the highway authority provisions, NCC would strongly prefer for all local highway authorities to agree a framework highways agreement with the applicant which allows for more detailed agreements to be made in relation to specific works.</p>	<p>Under discussion</p>
<p>Other matters as required</p>			

~~3.14 Other Matters~~

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Norfolk County Council on the date specified below.

Signed for and on behalf of National Grid:

.....

Date:

.....

Signed for and on behalf of Norfolk County Council:

.....

Date:

.....

Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
NCC	Norfolk County Council
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence

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