



## Application by National Grid Electricity Transmission for the Norwich to Tilbury project

### The Examining Authority's written questions and requests for information (ExQ1): Issued on Friday 22 May 2026

#### Responses are due by deadline 5: Wednesday 10 June 2026

The following table sets out the Examining Authority's (ExA's) second round of written questions and requests for information, referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex C** to the [Rule 6 letter](#) dated 13 January 2026. Additional topics have been added which may have arisen from representations, and to assist in the ExA's assessment of the application against relevant policies.

The scale of the proposed development is significant both in nature and geographically, and it encompasses 13 different local authority areas. The ExA would like to stress to the applicant and all interested parties (IPs) that the ExA need comprehensive answers to its written questions because the examination period is limited to a maximum of 6 months, and time in the hearing sessions planned for the week commencing 22 June will be limited. Such hearings will be focused to those issues which the ExA seek oral contributions, so as to assist in its understanding of the application and to inform its recommendation to the Secretary of State. There will not be sufficient time within those hearings to cover the wide range of issues encountered in the ExA's review of the application documents and relating to submissions from IPs.

All parties are reminded that the examination is a primarily written process.

The majority of the questions relate to submissions up to and including deadline 4 (12 May 2026), however due to the volume of documentation received, it has not been possible for the ExA to fully evaluate all the information submitted at that deadline. It is therefore possible that deadline 4 submissions may have already provided the information requested. If that is the case, then there is no need for a party to re-submit the information. Instead, in response to the question, please signpost where the information can be found by specific reference within a document identified through its Examination Library reference.

Column 2 of the table indicates which IPs and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.



When the table states ‘**all local authorities**’ this refers to the following: Norfolk County Council (CC), Suffolk CC, Essex CC, South Norfolk District Council (DC), Mid Suffolk DC, Babergh DC, Tendring DC, Colchester City Council, Braintree DC, Chelmsford City Council, Brentwood Borough Council (BC), Basildon BC and Thurrock Council.

Each question has a unique reference number which starts with a suffix for the topic then has an issue number and a question number. For example, the first question on air quality issues is identified as AQ 2.1. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting ‘Responses to Examining Authority’s Second Written Questions (ExQ2)’ when asked.

If you are answering a larger number of questions an editable version of this table in Microsoft Word is available on request from the case team: please contact [norwichtoilbury@planninginspectorate.gov.uk](mailto:norwichtoilbury@planninginspectorate.gov.uk) and include ‘Norwich to Tilbury ExQ2’ in the subject line of your email.



## Abbreviations used:

Abbreviation Description		Abbreviation Description	
AMS	Archaeological Mitigation Strategy	GLTA	Ground Level Tree Assessment
ARU	Anglia Ruskin University	GPIP3	Historic England's Good Practice Advice in Planning
BC	Borough Council	HP3	Hornsea Project 3 (UK) Ltd
BNG	Biodiversity Net Gain	HRA	Habitats Regulations Assessment
CC	County Council	ICOMOS	International Council on Monuments and Sites
CNP	Critical National Priority	IP	Interested Party/ Parties
CoCP	Code of Construction Practice	ISH	Issue Specific Hearing
CTMP	Construction Traffic Management Plan	km	Kilometres
DC	District Council	LEMP	Landscape and Ecological Management Plan
DCO	Development Consent Order	m	Metres
EACN	East Anglia Connection Node	NE	Natural England
ES	Environmental Statement	NL	National Landscape
ExA	Examining Authority	NPSA	National Protective Security Authority
ExQ1	Examining Authority's First Written Questions	NSIP	Nationally Significant Infrastructure Project



ExQ2	Examining Authority's Second Written Questions	NSR	Noise Sensitive Receptors
GCN	Great Crested Newt	OHL	Overhead Line
GLVIA3	Guidelines for Landscape and Visual Impact Assessments (3rd Edition, 2013)	PAR	Primary Access Route
Abbreviation		Description	
PRF	Potential Roost Features	SoCG	Statement of Common Ground
PRoW	Public Right(s) of Way	SWT	Suffolk Wildlife Trust
PRoWMP	Public Rights of Way Management Plan	WaLOR	Waveney and Little Ouse Landscape Recovery
RVAA	Residential Visual Amenity Assessment	WRA	Water Resources Assessment
SF6	Sulphur Hexafluoride	WSI	Written Scheme of Investigation

## The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [Norwich to Tilbury Examination Library](#)

It will be updated as the examination progresses.

## Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example GEN 2.1 – refers to the first question in this table.

## Index



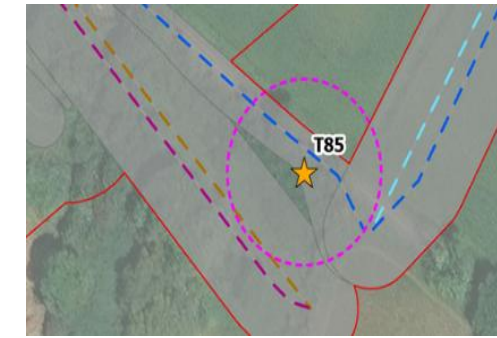
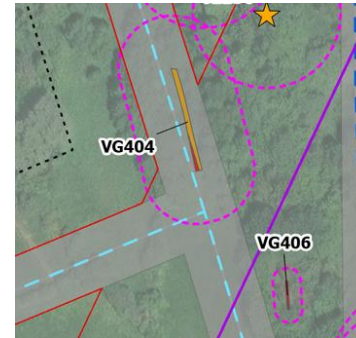
<b>GEN</b>	<b>General and cross-topic questions</b>	<b>6</b>
<b>DES</b>	<b>Design, parameters and other details of the proposed development</b>	<b>7</b>
<b>AQ</b>	<b>Air quality and emissions</b>	<b>8</b>
<b>BIO</b>	<b>Biodiversity, ecology and natural environment</b>	<b>8</b>
<b>CA</b>	<b>Compulsory acquisition, temporary possession and land rights</b>	<b>11</b>
<b>DCO</b>	<b>Draft Development Consent Order</b>	<b>11</b>
	Articles	11
	Schedules	12
<b>HE</b>	<b>Historic environment</b>	<b>16</b>
<b>HW</b>	<b>Health and wellbeing</b>	<b>18</b>
<b>LUS</b>	<b>Land use and soils, green infrastructure</b>	<b>19</b>
<b>LV</b>	<b>Landscape and visual</b>	<b>20</b>
<b>MW</b>	<b>Minerals and Waste</b>	<b>22</b>
<b>NV</b>	<b>Noise and vibration</b>	<b>23</b>
<b>PRoW</b>	<b>Public Rights of Way</b>	<b>23</b>
<b>SS</b>	<b>Safety and security</b>	<b>23</b>
<b>SET</b>	<b>Socio-economics, tourism and recreation</b>	<b>25</b>
<b>TT</b>	<b>Traffic and transport</b>	<b>25</b>
<b>WE</b>	<b>Water environment: flood risk, hydrology and drainage</b>	<b>27</b>

ExQ2	Question to:	Question:
<b>GEN General and cross-topic questions</b>		
GEN 2.2	The applicant All local authorities	<p><b>Legal Agreements</b></p> <p>Further to first written question (ExQ1) GEN 1.21, the applicant provided a table (appendix E <a href="#">[REP3-074]</a>) outlining the legal agreements requested to date by local authorities and setting out its comments, including on whether (or not) such an agreement would meet the relevant tests.</p> <p>All local authorities are invited to provide:</p> <ul style="list-style-type: none"> <li>• further comments on appendix E <a href="#">[REP3-074]</a>, or if already done this, to signpost to the ExA where in the examination library your comments on such matters can be found. In particular, the ExA seeks comments from the local authorities on how they consider each of its requests would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010).</li> </ul> <p>The applicant is asked to provide:</p> <ul style="list-style-type: none"> <li>• an update to the table of the requests</li> <li>• a summary of any ongoing agreements with local authorities which are being progressed, with expected time periods for completion</li> <li>• an update to the document 'Consents and licences required under other legislation' as necessary to include such other forms of agreement</li> <li>• updates to SoCG with local authorities as necessary to reflect agreement or non-agreement on the need for such agreements</li> </ul> <p><b>SNDC Response</b></p> <p>SNDC have no further comments to make and refer to our response to ISH2 Action Point 22</p>
GEN 2.4	The applicant All local authorities All IPs listed within the Report on interrelationship with other infrastructure projects	<p><b>Report on interrelationship with other infrastructure projects</b></p> <p>The ExA notes that the latest cut-off date for other existing and approved developments in the cumulative assessment is currently 31 January 2026 (Environmental Statement (ES) Chapter 17 - Cumulative Effects - Response Update <a href="#">[REP4-163]</a>, see also question GEN 2.5 below). However, the final version of the interrelationship report <a href="#">[REP4-296]</a> should include, as far as possible, the most up-to-date position relating to the progress of other approved and pending development proposals in a summary 'at a glance' document.</p> <p>The applicant is asked to:</p> <ul style="list-style-type: none"> <li>• ensure its final interrelationship report to be submitted at deadline 7 is consistent with ES chapter 17 and <a href="#">[REP4-163]</a></li> <li>• include an indication of the location of Tasway Energy Park (DCO 17) in table 2.1 of the next version of the report (the ExA notes that this proposal is not included in the plans due to the infancy of its design development) and, if available, an indication of its submission date to the Planning Inspectorate.</li> </ul> <p>All local authorities, and IPs who are listed in the interrelationship report, are asked to:</p> <ul style="list-style-type: none"> <li>• Review the interrelationship report <a href="#">[REP4-296]</a> and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish.</li> </ul> <p><b>SNDC Response</b></p> <p>SNDC agree with the interrelationship report as this has been updated.</p>
<b>DES Design, parameters and other details of the proposed development</b>		

DES 2.5	The applicant All local authorities	<p><b>Approach to scenarios</b></p> <p>The ExA notes the updates to the progress of a number of alternative design scenarios as noted in [REP4-310], and that a number of revised plans and documents are expected to be submitted at deadline 5, however it remains unclear when a number of the other alternative scenarios are likely to be confirmed for a number of reasons, including the progress of third party planning applications.</p> <ul style="list-style-type: none"> <li>The applicant is asked to ensure that by deadline 7 those outstanding alternative scenarios which remain are fully reasoned and timescales given wherever possible for such matters to be resolved.</li> <li>The local authorities are asked to review the Approach to Scenarios document [REP4-310], clarify their understanding of the scenarios which are reliant on third party planning applications, and to make other comments on the document where relevant to their area.</li> </ul> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter</p>
<b>BIO Biodiversity, ecology and natural environment</b>		
BIO 2.1	The applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	<p><b>Assessment of biodiversity deficit</b></p> <p>In response to ExQ1 BIO 1.4 the applicant has stated that replacement planting and habitat creation is identified as embedded/ standard mitigation within the outline Landscape and Ecological Management Plan (outline LEMP). The applicant considers that with this in place there would be no 'biodiversity deficit'.</p> <p><b>To applicant:</b> However, the ExA notes that as indicated in image 4.1 of ES Chapter 4 [APP-130] the overall construction programme, for example, for the Dedham Vale National Landscape the enabling works through to the initial energisation would take almost 4 years. Using this as an example and noting that up to a 120 metre (m) swathe of vegetation would need to be removed for the proposed underground cabling (and with a further 50m either side being "potentially affected") set out the worst-case scenario in time period from vegetation being removed to when you consider the replanted vegetation would reach a similar degree of maturity. Also, the applicant is requested to further explain its statement in response to BIO 1.4 that ES Chapter 8 [AS026] has taken into account any short term temporary effects on ecological receptors – explain this with worked through examples, such as for hedgerow species and also for bats, to demonstrate how impacts on biodiversity have been assessed for this intervening period.</p> <p><b>To all local authorities and Wildlife Trusts:</b> Set out your views on the potential for there to be biodiversity deficit and whether you consider this has been properly assessed in ES Chapter 8 and mitigated for by the applicant. Explain any outstanding concerns and what (if any) additional measures you would wish to see the applicant implement.</p> <p><b>SNDC Response</b></p> <ul style="list-style-type: none"> <li>We note that DEZNZ will be responsible for discharging the Requirements of Norwich to Tilbury</li> <li>Our response relates to [AS-026] <a href="#">EN020027-000639-6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B Clean Version.pdf</a> and its associated appendices.</li> <li>Natural England are the statutory consultee for internationally and nationally designated sites. We note that Natural England, in their Statement of Common Ground (see <a href="#">REP4-082</a>), agree with the conclusions of the EIA regarding Internationally Designated Sites, Nationally Designated Sites.</li> <li>SNDC note that the latest iteration of the OLEMP [REP3-031] includes consideration of impacts and mitigation on Meadow Wood Nature Reserve CWS (See Table 5.4). Meadow Wood Nature Reserve CWS has however not been included in the ES, so it is not clear how mitigation can be proposed if impacts have not been adequately identified. This CWS is likely to be irreplaceable habitat and treated as such in the ES.</li> <li>SNDC are in the process of responding to the SoCC..</li> </ul> <p><i>Non Statutory Designated Sites - Meadow Wood Nature Reserve CWS</i></p> <ul style="list-style-type: none"> <li>South Norfolk District Council remain concerned about the impacts to Meadow Wood Nature Reserve CWS. This site was designed by the Norfolk County Wildlife Site Partnership in March 2026 in response to the proposal (Targeted Consultation Norfolk 3 in early 2025) after it became clear that the alternative route proposed by National Grid in this area would be likely more harmful than the original.</li> <li>Surveys undertaken by National Grid did not identify the ecological importance of this site and having raised concerns in February 2025 National Grid did not undertake any additional survey work in this area. Chapter 8 of the ES has therefore not assessed impacts on this CWS and the AIA</li> </ul>

underplays the impacts as it does not identify or consider canopy cover. We do not agree that impacts in this area have been adequately assessed or sufficient consideration given to the mitigation hierarchy.

- Pre-commencement works will result in the undergrounding of the existing over-head-line. The cable will necessitate works adjacent to veteran tree group VG404, and veteran tree T85– requiring works within approximately half of the RPA. Impacts on the canopy have not been considered as this is not shown (contrary to BS5837). It is not clear if such extensive works are survivable. (Please note an alternative route was suggested by Grae Piercy in April 2025 which would reduce the damage). It is requested that an alternative, less damaging route is considered for the undergrounding of the existing overhead line.



- In the absence of topographical surveys to inform the impact assessment the extent of impact on trees is likely to be underestimated – for example veteran trees T1187-T1189 are shown as not impacted despite the internal haul road passing within the RPA and beneath the canopy (the clearance required for a Cable Drum AIL delivery vehicle is 5 m high (see [APP-310 EN020027-000188-7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy.pdf](#)). It is requested the OHL through CWS 2348 is undergrounded via HDD, and measures are put in place to avoid the need for a haul road in this location – avoiding the impact on veteran trees. Failing that using helicopters to lift cable drums and install pylons should also be explored to avoid impacts to the canopy of these veterans which would likely need raising to accommodate the large lorries
- The citation includes reference to possible ancient wood pasture, and ancient oak pollards, historic pollards and coppice stools on the boundary ditches and ancient woodland indicator species.



*Ancient Woodland*

- In July 2025 Grae Piercy wrote to Natural England with the intention of registering Meadow Wood Nature Reserve CWS – which would appear to be ancient wood pasture - as ancient woodland. A TPO has also been placed on this area by South Norfolk District Council. As ancient wood pasture it is ancient woodland it would be of national importance. It is requested that greater consideration is given to Meadow Nature Reserve CWS and is likely ancient woodland status as irreplaceable habitat.
- Where works impact irreplaceable habitats these habitats cannot be compensated for and there will be a biodiversity deficit. [APP 323 Document: 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy](#). It is noted that Natural England are still in discussion with National Grid as to whether the proposed mitigation is adequate. South Norfolk District Council are not satisfied that all reasonable opportunities have been undertaken to avoid impacting irreplaceable habitat noting that the proposal will cause significant harm to veteran trees and Meadow Wood Nature Reserve CWS which surveys by NWT indicate is ancient wood pasture.

*White Clawed Crayfish*

- White Clawed Crayfish should be considered within the ES as they are present in the R. Tas - [Norfolk Rivers Trust – Crayfish | Welcome to the Shotesham website](#).

*Wintering/passage birds*

- See comments to Bio 2.8

*Biodiversity Net Gain*

- Chapter 8 sets out National Grid commitment to delivering at least a 10% BNG but this commitment is not reflected by a requirement within the DCO as such there is no mechanism to quantify losses, or gains. It is requested the DCO is amended to include a BNG Requirement.
- With regards to the BNG baseline, and in line with best practice guidance, when discharging the requirement, all trees impacted need included within the baseline so they can be compensated accordingly (at the present time it is not clear how NG will replace individual trees and small groups of trees where the number of trees has not been quantified). In line with the [BNG user guide](#) all veteran trees and ancient trees should also be recorded as individual trees and not grouped (e.g. VG404 and VG 606).
- Land within the ‘maximum construction area’ will be used as the baseline. Please can NG define what is meant by the ‘maximum construction area’ as it is unclear what this includes noting that the baseline has not been included for an area of archaeological trenching at RG 56 – Area 4. As this habitat is impacted it needs to be included within the baseline to ensure there is no biodiversity deficit.

*Arboriculture*

- It is requested that all potential/possible veterans (and notable trees) should be identified and treated as veterans until proven otherwise via an appropriate survey e.g T32 is a ‘possible veteran’. T32 is not labelled on Figure A13.6.1 – Landscape and Visual Arboricultural Impacts Plan Overview) raising concerns that a. it is veteran but has not been adequately assessed and b) it could be impacted because it is not mapped. Lastly, if not veteran now it will be a veteran tree of the future and should protected as if it were a veteran tree.
- Veteran tree surveys<sup>1</sup> were undertaken at a time of year when fruiting bodies would not necessarily be present. Because of this it is likely that there are some trees that have not been correctly identified. It is requested that where trees (e.g. 52 and 53) which would appear borderline veteran that they are treated as veteran.
- It is advised that there are now 9 TPOs (inc a 30m buffer) in Section A (South Norfolk) which need to be considered.
- It is requested that further consideration is given to the locations of pylons RG20 and RG21 in that they should be re-aligned to the west to avoid veteran tree T61 which is currently beneath the overhead line.
- [APP 032](#) Document: 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy sets out the compensation strategy for impacts to irreplaceable habitats. It need sot consider Meadow Wood Nature Reserve CWS which NWT have identified as potentially ancient wood pasture (Irreplaceable habitat). It is noted that NE have not yet agreed the strategy is adequate however SNDC maintain our concern that greater consideration should be given to avoiding the impacts in the first instance.



*Pre-commencement Works*

- Undergrounding of the OHL will be undertaken as part of pre-commencement works<sup>2</sup> including the undergrounding within the Waveney Valley. These works will be undertaken by third party providers (including UKPN) prior to detailed ecological and arboricultural surveys being completed. Habitat losses associated with these will therefore not be adequately surveyed (to establish the baseline) or mitigated and compensated to the point of no net loss as there is no mechanism (e.g. a Requirement) to secure this as part of the DCO. It is requested the DCO is amended to ensure that ecological and arboricultural surveys are undertaken and use to inform the design of pre-commencement works. Vegetation removal can be carried out under pre-commencement works before the detailed design had been finalised likely resulting in the unnecessary loss of habitats when, for example, bell mouths are scoped out.

*DCO*

- As submitted the DCO does not specifically require the Discharge of the Requirements to be based on the detailed design and completed/updated ecology/arb reports. Based on previous experience it is requested that the DCO be amended to require:
  - copies of the updated ecology and arboricultural reports to be provided, along with
  - details of the assured design
 when discharging the LEMP and CoCP for each stage/substage<sup>3</sup> so that, for example, the LEMP and CoCP can demonstrate how the ecological mitigation hierarchy has been followed and the there is no biodiversity deficit and a net gain can be achieved.

<sup>1</sup> [APP 323](#) Document: 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy notes that Raven 2 was used to identify veteran trees.

<sup>2</sup> see 4.8.88 of volume 6 Environmental Statement Document 6.4 ES Chapter 4 Project description and DCO

<sup>3</sup> Stage Plan submitted to the relevant LPAs in accordance with Requirement 3 of the draft DCO

		<p><i>Flyways</i></p> <ul style="list-style-type: none"> <li>Bat '<b>flyways</b>' (as shown in App-326, and 6.1.14 of the oLEMP) were identified based on the presence of static bat detector locations, however not all hedges/hedges with trees and watercourses were surveyed with a static detector. To avoid fragmenting habitat for bats it is requested that all hedges/lines of trees/hedges with trees/water courses/woodland edges are assumed to be a flyway and used by foraging and commuting bats, rather than just those surveyed as the absence of survey data for these features does not mean they are not important for bats. Flyways should be placed on these features too. It is requested the NG confirm how long the 'flyways' will be in use for (e.g. until vegetation is established?).</li> </ul> <p><a href="#">APP-299 7.1 Biodiversity Net Gain Report (Final Issue A)</a>          Para 3.4.4. advises that that where practicable vegetation would be trimmed or cut to stump rather than full removal. Please note that where trees are 'cut to stump' for visibility they need to be considered as lost as many species do not coppice, and the success of coppicing depends on the age. Unless consideration is given to whether the management measures are appropriate, SNDC remain concern that impacts are not going to be adequately compensated.</p>
<p>BIO 2.8</p>	<p>All local authorities          Norfolk Wildlife Trust          Suffolk Wildlife Trust</p>	<p><b>Monitoring the effects on birds</b></p> <p>In response to ExQ1 BIO 1.13 regarding the use of bird diverters the applicant in <a href="#">[REP3-074]</a> states that ES Chapter 8 <a href="#">[AS-026]</a> and the Habitat Regulations Assessment (HRA) Report <a href="#">[APP-082]</a> predict no significant adverse effects on birds during operation of the proposed development either with or without mitigation and therefore additional monitoring or adaptive management is not considered necessary or proportionate. Do you agree with the applicant's comments in this regard, if not then please explain why and set out what additional monitoring and (if necessary) adaptive management you would wish to see secured.</p> <p><b>SNDC Response</b></p> <p>The conclusion of 'no significant adverse effects' of the shadow HRA relates to the Stour and Orwell Estuaries SPAs and Ramsar site, rather than impacts on birds in the River Waveney area. It is a matter of fact that birds will collide with the earth wire and conductors.</p> <p><a href="#">[REP3-074]</a> advises that bird diverters are proposed at two locations including over the River Waveney in South Norfolk -between pylons RG87 and TG88 (see Outline Landscape and Ecological Management Plan, Appendix F – Bird Diverter Locations <a href="#">[APP-327]</a>). The use of bird diverters at the R. Waveney is precautionary because works associated with Waveney and Little Ouse Recovery Project (WaLOR) are expected to improve habitat in this area and become more suitable for waterbirds in the future.</p> <p>The effectiveness of bird diverters at preventing collision risk by birds varies depending on the type of diverter used (with the flapper flight diverter performing best in one study<sup>4</sup>) but it is widely accepted that flight diverters generally lower mortality rates (one study suggests by 52% compared with unmarked spans (see <sup>1</sup>)). A proportion of birds will continue to collide with the spans even with the use of bird diverters.</p> <p>We would suggest that National Grid are asked to provided further details with regards to: which type of bird diverter will be used; how close they will be placed (e.g. every 5 m); and details of maintenance. We would also seek clarification as to whether bird diverters will be placed on the ground wire as well as conductors.</p> <p>With regards to monitoring Bird Strike Indicators<sup>5</sup> could be used to monitor bird collisions assuming they can be installed and replaced without causing additional damage to habitats (see <a href="#">5.10.2. Measures to reduce risks caused by powerlines - Biodiversity &amp; infrastructure handbook</a>). Because birds will hit the conductors and earth wires the aims of the monitoring would need to be clear e.g. at which threshold would remedial action be taken, and what would this look like (e.g. increasing the density of the diverters). The cost of monitoring bird collision in the two proposed locations would not be significant, and should further mitigation be required because habitats along the R. Waveney becomes more suitable for water birds, any measures would serve to further reduce bird mortality.</p>

<sup>4</sup> See <https://www.sciencedirect.com/science/article/pii/S2351989420306715> Efficacy of different types of "bird flight diverter" in reducing bird mortality due to collision with transmission power lines - ScienceDirect (accessed 27/5/2026).

<sup>5</sup> See <https://www.edmlink.com/bsi>

DCO Draft Development Consent Order		
DCO 2.G2	All local authorities	<p><b>DCO General 2</b></p> <p>In light of the applicant's response to ExQ1 [<a href="#">REP3-074</a>], question SET 1.5, and the Secretary of State's <a href="#">decision letter for The North Falls Offshore Wind Farm Project</a> dated 14 May 2026, especially paragraphs 4.192 to 4.194 (inclusive), do you have any further comment in regard to the use of the term "where practicable" or any variant of that term.</p> <p><b>SNDC Response</b></p> <p>SNDC have no further comments to make on this matter and refer to our comments in our Relevant Representation and Local Impact Report.</p>
DCO 2.S3	The applicant All local authorities	<p><b>Schedules 3, Requirement 4 (Construction Management Plans) 1</b></p> <p><u>Complaints procedure under the Outline CoCP secured by Requirement 4</u></p> <p>Thurrock Council in its deadline 4 submission [<a href="#">REP4-339</a>], as well as a number of other County/ Local Authorities raises concerns in regard to the complaints management process. It considers the current complaints management process, as detailed in the updated outline CoCP [<a href="#">REP3-025</a>] to be "...too basic." It highlights that although it includes contact details and requires complaints to be logged, it is lacking in significant areas. These include, but are not limited to defined response times; defined escalation procedures, requirements related to ongoing communication with complainants; identifying persons/parties with clear responsibility for resolving issues; and transparency through shared recording with the local authorities. The ExA requests:</p> <p>i) the applicant addresses these concerns raised and updates the complaints management process by incorporating them into a revised/updated complaints management process.</p> <p>The local authorities are to provide draft wording for a complaints management process it/they would be satisfied with.</p> <p><b>SNDC Response</b></p> <p>Requirement 21 of the consented Hornsea Project Three DCO stated that a Noise Management Plan was required with details of a Noise Complaints Procedure. SNDC, from experience, have found that this has been appropriate and effective for the handling of Noise Complaints.</p>
DCO 2.S6	The applicant All local authorities	<p><b>Schedules 3, Requirement 4 (Construction Management Plan) 4</b></p> <p><u>Noise and Vibration</u></p> <p>Thurrock Council in its deadline 4 submission [<a href="#">REP4-347</a>], along with other County/ Local Authorities, raises concerns in regard to the applicant's approach to noise and vibration monitoring, alleging it is not sufficiently developed and there is no clear or structured strategy for dealing with such matters. The Council highlights: there is no commitment to routine monitoring: no use of simple baseline checks like listening tests; no clear triggers for more detailed monitoring; and no defined thresholds for action or reporting requirements.</p> <p>The ExA requests the applicant to address these concerns raised and updates the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure.</p> <p>Local authorities are asked to collaborate and provide and agreed draft wording for the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure.</p> <p><b>SNDC Response</b></p> <p>2022 No. 1070 Infrastructure Planning- A47/A11 Thickthorn Junction Development Consent Order (TR010037)</p> <p>SNDC advise that Requirement 4 of the A47/A11 Highways DCO included a Noise Complaints Procedure within the Environmental Management Plan which the Council have found appropriate and effective for the handling of noise complaints and recommend similar wording to the below extract taken from the Construction Dust, Noise, and Vibration Management Plan dated 01 October 2024.</p> <p><i>'In line with REAC G7, all stakeholder enquiries and feedback received will be captured on the National Highways Complaints Relationship Management (CRM) database and Skanska's equivalent system, ensuring response timescales are met.</i></p> <p><i>The Skanska Stakeholder Manager will be responsible for managing the stakeholder action tracker/database and will work closely with the integrated project teams. They will seek, monitor, and record feedback from customers and stakeholders which will be used to develop appropriate actions. The effectiveness of these actions will be reviewed against customer needs and satisfaction levels.</i></p>

		<p><i>Stakeholder related issues, risks, and opportunities will be captured on a suitable Risk and Opportunity Register. Regular discussions regarding risk and opportunity any possible solutions will be held with the National Highways communications manager and escalated where necessary.</i></p> <p><i>More details are provided in the Construction Communications Strategy (document reference HE551492-SKAG-EPC-000-PL-ZH-00001) appended to the EMP at Annex B.2.'</i></p>
DCO 2.S10	The applicant All local authorities	<p><b>Schedules 3, Requirement 7 (Construction Hours)</b></p> <p>The local authorities are maintaining their concerns in regard to this requirement, especially in terms of the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, Sundays and bank holidays, together with additional start-up and close-down activities outside these hours. The ExA notes the applicant's extensive response to ExQ1 [REP3-074] at question DCO 1.S10, especially at pages 210 and 211, where it states in relation to just removing Sundays or bank holidays/ other public holidays "Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely unchanged."</p> <p>The ExA has noted all the justifications put forward by the applicant, as well as the applicant's final sentence in this question where it states "...removal of Sundays and/or bank holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the project." The applicant is asked to model the scenarios of removing:</p> <ul style="list-style-type: none"> <li>a) just Sundays</li> <li>b) just bank and other public holidays</li> <li>c) Sundays and bank and other public holidays</li> </ul> <p>and then confirm whether the energisation date on the baseline construction programme would remain largely unchanged in relation to each of those scenarios.</p> <p>The ExA asks the local authorities to collaborate and provide a single form of wording for this requirement that they consider to be a reasonable compromise that collectively satisfies the concerns being raised in regard to this requirement, so this can assist in informing a discussion at ISH3 into the draft DCO. The wording submitted should include, but not be limited to, the core construction hours specified, start and close down activities and the operations that may take place outside of those core working hours.</p> <p><b>SNDC Response</b> SNDC have no further comments to make and refer back to our Local Impact Report.</p>
DCO 2.S11	All local authorities	<p><b>Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows)</b></p> <p>The ExA asked in ExQ1 DCO 1.S12 [PD-014] why arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas are not clearly defined and being secured prior to construction as part of this requirement.</p> <p>The applicant responded [REP3-074] "...The submission of an Arboricultural Method Statement is secured through the outline LEMP and requirement 4 of the draft DCO. The outline LEMP states 'All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement to be produced following detailed design and agreed with the relevant Local Planning Authorities prior to construction activity commencing. The Arboricultural Method Statement will include protection measures including tree protection fencing, as discussed in Section 7.3. and illustrated in a Tree Protection Plan'. Therefore, whilst the Arboricultural Method Statement is not secured through requirement 8, it is secured through requirement 4 and full details will be provided within the final LEMP(s) prior to the stage of works commencing."</p> <p>The ExA seeks comments from the local authorities on the applicant's reply or, if you have already responded to this matter, signpost where you have provided a response on this matter.</p> <p><b>SNDC Response</b> SNDC accept that these will be secured with the detailed design stage of the project.</p>

DCO 2.S12	All local authorities The applicant	<p><b>Schedule 3 – Requirements 13 (Decommissioning)</b></p> <p>Braintree DC, in its response to ISH2 Action Points <a href="#">[REP4-323]</a>, considers the DCO should include ‘...a clear obligation on the undertaker... to remove any equipment or infrastructure that becomes obsolete, in order to avoid unnecessary long-term impacts on landscape, heritage and residential amenity.’</p> <p>The ExA would seek clarification from Braintree DC or any local authority:</p> <p>i) how the relevant planning authority would determine equipment/ infrastructure has become obsolete; ii) whether the removal of such equipment/ infrastructure should be within a specified/ fixed period of time from it becoming obsolete, for example 6 months; and iii) whether some form of control over the decommissioning of such obsolete equipment/ infrastructure, such as a written scheme of decommissioning to be submitted to the relevant planning authority for its approval, should be included within the requirement.</p> <p>The ExA also asks the applicant to comment on this matter.</p> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter.</p>
DCO 2.S13	All local authorities	<p><b>Schedule 4 – (Discharge of Requirements)</b></p> <p>Schedule 4(3) - Fees</p> <p>The ExA notes the applicant’s responses to ExQ1 <a href="#">[REP3-074]</a>, question DCO1.S20 related to fees and asks the local authorities if they wish to raise anything in regard to this matter, especially:</p> <p>a) paragraph 3(1)(a) of Schedule 4 (discharge of requirements) to the Draft DCO already providing for the application fee for the discharge of conditions to be such fee as is prescribed under the relevant regulations and the drafting in paragraph 3(1)(b) providing for an alternative figure or arrangement that would apply in the absence of there being a prescribed fee</p> <p>b) the term "per request" having the same meaning as in the Town and Country Planning regime, meaning that the fee would be per application for consent (i.e. more than one consent could be sought in one application) and not for each individual discharge of requirement or consent contained in an application for approval.</p> <p>It is noted the applicant has used the term ‘per request’, which as far as the ExA can see is not used in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. The term ‘Each Request’ is used. The ExA invites all local authorities to comment on this should they wish.</p> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter.</p>
<b>HE Historic environment</b>		
HE 2.13	All local authorities	<p><b>Updated version of the outline AMS/ outline WSI</b></p> <p>The ExA is aware that, as referenced by the applicant in <a href="#">[REP4-298]</a> an updated version of the outline AMS/ outline WSI <a href="#">[APP-328]</a> is due to be submitted at deadline 5. However, the applicant has indicated that this updated document would be shared with the local authorities for review at deadline 4. Please provide any initial views (and without prejudice to any formal comments you may wish to make on the submitted version at deadline 6) on the updated version of the outline AMS/ outline WSI that you might have.</p> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter.</p>
<b>LUS Land use and soils, green infrastructure</b>		
LUS 2.4	The applicant All local authorities	<p><b>Green Belt - 3</b></p> <p>With reference to paragraph 5.11.38 of NPS-EN1 can the applicant and local authorities identify any Local Green Spaces that have been designated in Local Plans that would enjoy the same protection as Green Belt through which the proposed development would pass, and confirm whether these areas should be given the same protection as green belt in the consideration of this application. If not please explain your reasoning.</p> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter.</p>

LV Landscape and visual		
LV 2.16	All local authorities	<p><b>Mitigation and compensation - 1</b></p> <p>Point 8.2e <a href="#">[REP4-302]</a> states that the applicant considers it has provided sufficient mitigation and that the residual impacts are vastly and substantially outweighed by the public benefits of the proposed development, and that consequently further compensation for landscape and visual effects would be disproportionate.</p> <p>The local authorities, particularly Suffolk County Council, are asked to provide views on this statement, referring to the Bramford to Twinstead examination report where relevant.</p> <p>Any other IP may also respond if they wish.</p> <p><b>SNDC Response</b></p> <p>SNDC have no comments to make on this matter.</p>