

AENC-NG-CNS-REP-0118

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.5 Draft Statement of Common Ground - South Norfolk
District Council - Clean Version

Final Issue D

June 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(g)

nationalgrid

Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
D	10 June 2026	Deadline 5

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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 the Applicant within this document) and South Norfolk District Council (SNDC). It identifies areas of the Norwich to Tilbury project (the 'Project') within the 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 SNDC. The applicable matters considered within this SoCG apply to SNDC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):
- Project development, description and design
 - Ecology and Biodiversity
 - Air Quality
 - Noise and Vibration
 - Health and Wellbeing
 - Historic Environment
 - Landscape and Visual
 - Socioeconomics, Recreation and Tourism
 - Cumulative Effects
 - Development Consent Order Other Matters

Note: This draft SoCG has been prepared for Deadline 5. It is intended to be a live and working document which will be updated as the Project progresses and shared with South Norfolk District Council 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.

SoCG ID	Summary of matter under discussion	Deadline for resolution
Ecology and Biodiversity		
3.3.7 – Baseline conditions and receptors 3.3.8 – Embedded mitigation 3.3.9 – Standard mitigation 3.3.10 – Additional mitigation 3.3.11 – Construction effects 3.3.12 – Operational (and maintenance) effects 3.3.13 Outline CoCP	SNDC is reviewing these sections relating to Ecology and Biodiversity and will provide the Applicant with an update once complete. The Applicant will liaise with SNDC once feedback is received.	Resolution likely by Deadline 7.
3.3.14 – Outline LEMP	SNDC requested each section be separated for each district. SNDC stated that the BNG hierarchy needs to be considered as part of the LEMP. The Applicant is committed to delivering a minimum of 10% BNG for the Norwich to Tilbury scheme.	Resolution likely by Deadline 7.
3.3.16 – Vegetation removal	SNDC believes general authorisation to remove 'potentially affected' vegetation is inappropriate and too ambiguous. The Applicant has clarified that the 'potentially affected' category includes allowances for changes to vegetation loss due to design flexibility within the Limits of Deviation. It is not expected that the overall vegetation removal would be significantly different, but the location of impact may change slightly in detailed design.	Resolution likely by Deadline 7.
3.3.21 – Arboriculture Impact Assessment	South Norfolk Council is concerned that the Arboricultural survey has identified multiple significant trees that will be compromised by the current proposals; these include several irreplaceable veteran specimens. The Applicant notes that the project will ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable.	Resolution likely by Deadline 7.
Air Quality		
3.4.7 – Embedded mitigation	SNDC considers that further embedded measures should be included, including the judicial siting of compounds and designing the	Resolution likely by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
	proposed works to minimise air pollution. The Applicant believes the embedded mitigation measures are appropriate and adequate to address potential effects.	
3.4.8 – Standard mitigation	SNDC finds the proposals generally acceptable, but notes measures will need to be specific to the proposed works at each location. The Applicant considers the standard mitigation measures appropriate and adequate to address potential effects.	Resolution likely by Deadline 7
3.4.10 – Construction effects	SNDC consider the construction effects are generally accepted, through ongoing engagement, including with the main works contractor. The Applicant considers the assessment of effects during construction presented to be appropriate.	Resolution likely by Deadline 7
Historic Environment		
3.6.6 – Key parameters and assumptions (viewpoints)	SNDC reserve comments on this matter subject to reviewing additional visualisations submitted by NG at Deadline 5.	Resolution likely by Deadline 7
3.6.10 – Additional mitigation	SNDC have requested this matter remain under discussion. The Applicant considers the additional mitigation appropriate and adequate to address potential effects.	Resolution likely by Deadline 7
Landscape and Visual		
3.7.7 – Embedded mitigation 3.7.8 – Standard mitigation 3.7.9 – Additional mitigation 3.7.10 – Construction effects 3.7.11 – Operational (and maintenance) effects 3.7.12 – Outline CoCP 3.8.13 – Outline LEMP	SNDC is reviewing these sections relating to landscape and visual and will provide the Applicant with an update once complete. The Applicant will liaise with SNDC once feedback is received.	Resolution likely by Deadline 7
3.7.15 – Reinstated habit monitoring	SNDC request monitoring of Reinstated habitats is extended from 5 to 10 years. The Applicant considers the five-year monitoring period for tree and hedgerow replacement planting is sufficient. The monitoring period is adaptive and includes like-for-like replacement or consideration of	Resolution likely by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
	alternative species based on site-by-site conditions and the reasons for failure.	
Socio-economics, Recreation and Tourism		
3.8.10 – Construction effects	SNDC is reviewing these sections relating to socio-economics, recreation and tourism and will	Resolution likely by Deadline 7
3.8.11 – Operational (and maintenance) effects	provide the Applicant with an update once complete. The Applicant will liaise with SNDC once feedback is received.	
3.8.12 – Outline CoCP		
Cumulative Effects		
3.09.12 – Outline CoCP	SNDC is reviewing the content of the Outline CoCP. The Applicant will liaise with SNDC once feedback is received.	Resolution likely be Deadline 7
Development Consent Order		
3.10.1 – Interpretation	<p>SNDC considers the current DCO drafting regarding the use of “general accordancce” too flexible and seeks tighter controls to ensure only ‘de minimis’ changes are permitted.</p> <p>The Applicant considers the current DCO drafting is appropriate and notes that any amendments must not give rise to materially new or materially different environmental effects and do not permit material changes.</p>	Resolution likely by Deadline 5.
3.10.2 – Construction management plans	<p>SNDC considers that additional consultees, including the Environment Agency, Local Highway Authority, and National Highways, should be explicitly included.</p> <p>The Applicant will continue to liaise with SNDC on the inclusion of additional consultees where necessary.</p>	Resolution likely by Deadline 5.
3.10.3 – Stages of authorised development	<p>SNDC seeks a phasing plan to be agreed prior to any works to provide clarity and avoid ambiguity in the sequencing of pre-commencement operations.</p> <p>The Applicant considers requiring a full phasing plan before pre-commencement operations to be disproportionate but agrees that phasing should be confirmed prior to construction.</p>	Resolution likely by Deadline 7.
3.10.4 – Archaeology discharging authority	SNDC requests further clarity regarding the identification of the appropriate authority and consultees for discharging requirements in a two-tier areas and notes that historic environment matters fall within the remit of the County’s Historic Environment Service.	Resolution likely by Deadline 6.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>The Applicant has amended the Draft DCO to clarify that the district planning authority is the discharging authority, with the county planning authority included as a consultee where relevant.</p>	
3.10.5 – Design and layout plans	<p>SNDC considers the current DCO drafting regarding the use of “general accordancy” too flexible and seeks tighter control, limiting its application to de minimis changes unless further details are approved.</p> <p>The Applicant considers the current DCO drafting is appropriate and notes that material changes are not permitted beyond those assessed in the Environmental Statement.</p>	Matter unlikely to be agreed.
3.10.7 – Trees, woodland and hedgerows	<p>SNDC considers Requirement 8 unnecessary as tree retention and removal are already addressed through plans submitted under Requirement 4. The Applicant considers Requirement 8 necessary to ensure full identification of affected trees and hedgerows across the entire route.</p>	Resolution likely by Deadline 7.
3.10.8 – Reinstatement planting	<p>SNDC seeks removal of the term “reinstatement,” clearer definition of timing as the “next planting season,” and a longer 10-year replacement period.</p> <p>The Applicant considers the current DCO drafting appropriate and notes it includes flexibility on timing and a 5-year replacement period consistent with recent DCO precedents.</p>	Resolution likely by Deadline 7.
3.10.9 – Reinstatement schemes	<p>SNDC questions the justification for the 21-month period and seeks clarification, suggesting it may be excessive or an error. The Applicant confirms the 21-month period aligns with the time periods in Articles 27 and 28 of the Draft DCO which control the temporary use of land.</p>	Resolution likely by Deadline 5.
3.10.10 – Additional requirements	<p>SNDC seeks additional or expanded Requirements in relation to implementation and maintenance of landscaping; contaminated land and groundwater management; noise control measures and control of critical light emissions.</p> <p>The Applicant considers that these matters are already appropriately secured by Requirement 4, which requires the submission and approval of detailed management plans for each stage of the authorised development, in substantial accordancy with the approved outline plans.</p>	Resolution likely by Deadline 7.
3.10.11 – Drainage strategy	<p>SNDC seeks a new Requirement to secure a Drainage Strategy.</p>	Resolution likely by Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	The Applicant considers this is already secured through Commitment GG22 in the Outline Code of Construction Practice [REP4-164] , which provides for a Surface Water Management Plan to be in accordance with the Drainage Strategy submitted at Deadline 1 and updated at Deadline 4.	
3.10.13 – Employment and skills plan	SNDC seeks a new Requirement to secure an Employment and Skills Plan. The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this plan will be secured by a new DCO Requirement.	Resolution likely by Deadline 6.
Appendix A - DCO Wording	Discussions are ongoing in relation to detailed drafting points on: <ul style="list-style-type: none"> • Decision-making and approval timescales; • Limits of deviation; • Statutory nuisance; and • Discharge process. 	Resolution likely by Deadline 7.

1.3 Project Description

1.3.1 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 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 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 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 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with SNDC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

2. Record of Key Engagement

2.1 Introduction

2.1.1 The Applicant has engaged with SNDC 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 draft documentation at key stages

2.1.2 Further details on the Applicant’s engagement with stakeholders is provided in **5.1 Consultation Report – Appendix A: Meetings and correspondence with stakeholders [APP-067]** and throughout 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 the Applicant and SNDC.

Table 2.1 Summary of key engagement between the Applicant and SNDC

Date	Format	Topic/Description
General		
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.
October 2023 - Ongoing	Meeting	SNDC monthly informal catch-up meetings and ad hoc as required.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	The Applicant 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	The Applicant issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	The Applicant issued the Works In, Over and Under Watercourses technical note.
September 2024	Email Correspondence	The Applicant issued the draft Outline Code of Construction Practice (Outline CoCP) [REP4-164] and draft Outline Landscape and Ecological Management Plan (Outline LEMP) to all host authorities for comment.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	The Applicant shared the 2 nd iterations of the Outline LEMP and Outline CoCP.
January 2025	Meeting	The Applicant held a meeting to discuss comments from stakeholders on the 2 nd iteration draft versions of the Outline LEMP and Outline CoCP.
March 2025	Meeting	All host authority workshop

Date	Format	Topic/Description
April 2025	Email Correspondence	The Applicant shared the draft Statement of Common Ground for comment.
May 2025	Email Correspondence	The Applicant shared the updated draft OCoCP and OLEMP for comment.
May 2025	Email Correspondence	The Applicant issued Appendix D to the OLEMP - Outline Landscape Proposals
May 2025	Email Correspondence	The Applicant issued Appendix H to the OCoCP – Draft Greenhouse Gas Reduction Strategy.
November 2025	Meeting	All host authority workshop
January 2026	Meeting	Meeting to progress Statement of Common Ground
January 2026	Meeting	Meeting to discuss approach to DCO requirements
January 2026	Meeting	All host authority workshop
March 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
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
Ecology and Biodiversity		
August 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for Biodiversity Net Gain (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	The Applicant 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	The Applicant shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.

Date	Format	Topic/Description
January 2025	Email Correspondence	The Applicant issued the Protected Species Proposed Mitigation Measures to stakeholders including SNDC.
January 2025	Meeting	The Applicant held a meeting to discuss comments on proposed mitigation for species outside the remit of Natural England.
January 2025	Email Correspondence	The Applicant issued the BNG Strategy to stakeholders including SNDC.
January 2025	Meeting	The Applicant held a meeting to discuss comments on the BNG report.
January 2025	Email Correspondence	The Applicant shared the 2 nd iteration of the Outline LEMP
April 2025	Email Correspondence	The Applicant issued the draft Arboricultural Impact Assessment.
April 2025	Meeting	The Applicant hosted a meeting to discuss comments on the 2 nd iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	The Applicant hosted a meeting to discuss comments from the updated proposed mitigation for species outside the remit of Natural England.
March 2026	Meeting	The Applicant hosted a meeting to discuss the matters under discussion for ecology within the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.

Air Quality

September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Air Quality assessment for review and comment.
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Noise and Vibration

September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
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Health and Wellbeing

September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the EIA Assessment, including guidance, study area, scope, and assessment methodology.

Date	Format	Topic/Description
September 2024	Meeting	The Applicant 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	The Applicant 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.
Historic Environment		
July 2022	Email Correspondence	The Applicant 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	The Applicant 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	The Applicant 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	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities to agree methodology for the 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	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	The Applicant shared the updated viewpoints (including

Date	Format	Topic/Description
	Correspondence	ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
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
October 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting – aim was to seek agreement on the Historic Environment Methodology with respect to study area and assessment approach.
November 2024	Meeting	Archaeology Working Group Meeting
December 2024	Meeting	Archaeology Working Group Meeting
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Technical Note	The Applicant shared the Historic Environment Viewpoint documents and shapefiles
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Viewpoint Meeting to discuss proposed viewpoints
February 2025	Technical Note	The Applicant shared the draft Historic Environment Baseline Report
February 2025	Meeting	The Applicant held a meeting to discuss the Heritage Baseline Report.
March 2025	Meeting	Archaeology Working Group Meeting
March 2025	Email Correspondence	The Applicant issued updated the Historic Environment Viewpoints information to stakeholders including SNDC.
April 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	The Applicant issued the Draft Outline Archaeological Mitigation Strategy and Draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.
May 2025	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	The Applicant shared the Archaeological Fieldwork Summary.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	The Applicant shared Priority Geophys Prelim Grayscales with stakeholders for consideration
September 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	An optional thematic group meeting to discuss feedback on the Historic Environment section of the ES.
October 2025	Meeting	Archaeology Working Group Meeting
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	The Applicant shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Technical Note	The Applicant shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Meeting to discuss the Historic Environment Section of the Statement of Common Ground.
January 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Email Correspondence	The Applicant 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.
March 2026	Meeting	Archaeology Working Group Meeting
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.

Date	Format	Topic/Description
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	Thematic Group meeting – proposed viewpoint locations - Norfolk
April 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023	Meeting	EIA viewpoints meeting - Norfolk
May 2023 – March 2024	Email Correspondence	The Applicant 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 information available at this date).
August 2023	Email Correspondence	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	The Applicant responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	The Applicant 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	The Applicant 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	The Applicant shared the shapefiles for the landscape viewpoints and order limits with SNDC and other

Date	Format	Topic/Description
		stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Norfolk.
October 2024	Meeting	Focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	The Applicant shared updated viewpoint information data following from the landscape thematic workshops
December 2024	Meeting	Methodology and VP discussion with Norfolk County Council and South Norfolk District Council.
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in SNDC's Local Impact Report.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant 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	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.

Date	Format	Topic/Description
April 2024	Technical Note	The Applicant 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	The Applicant 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	Technical Note	The Applicant issued the 3 rd Socio-economics Recreation and Tourism Technical note on the ES Chapter.
September 2025	Meeting	An optional thematic group meeting to discuss feedback on the Socio-economics, Recreation and Tourism section of the ES.
March 2025	Email	The Applicant shared a 3 rd Technical note to agree the study area and assessment criteria for comment.

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1 This chapter details the matters relevant to SNDC 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 SNDC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 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.
Not Applicable	Indicates where an issue is not relevant to the stakeholder and therefore does not require further discussion or agreement.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 Table 3.2 to Table 3.10 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	South Norfolk District 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>SNDC Response to Statutory Consultation (26/07/2024):</p> <p>South Norfolk District Council recognises the need for increased capacity to the existing electricity transmission networks across the Eastern Region in order to cope with the additional new energy generation from offshore windfarms, nuclear power and interconnection with other countries and particularly the significant amount of energy generation above current capacity connecting into Norwich Main and Necton.</p> <p>The Council equally understands that the project would assist in meeting the UK's energy ambition to achieve net zero carbon emissions by 2050 and the Governments Clean Energy target of 2030</p>	Agreed
3.2.2	Project timing	<p>Timing for the project 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. The Applicant 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>SNDC Response to Statutory Consultation (26/07/2024):</p> <p>Following the Independent Review commissioned by Norfolk, Suffolk and Essex County Council's which suggested that the delivery is not needed until 2035, we also have concerns regarding the timing of the proposal.</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>Appendix 2 of the NESO Clean Power 2030 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>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>	<p>SNDC acknowledges the govts Clean Power 2030 Action Plan and its mission (Dec 2024) setting out its plan for infrastructure pathways and capacity ranges, setting out the emphasis for Norwich to Tilbury to enable energy to be transmitted throughout the UK.</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 [APP-355 and APP-357] 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>SNDC Response to Statutory Consultation (26/07/2024):</p> <p>SNDC consider that a coordinated, Offshore approach would be our preferred solution, to minimise onshore infrastructure. If this is proven to be undeliverable then the Council considers that support should be given to the Undergrounding the whole route.</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<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>		
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p>Updated 7.17 Strategic Options and Backcheck Review documents [APP-355 and APP-357] 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 HVDC cables, 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>SNDC Response to Statutory Consultation (26/07/2024):</p> <p>SNDC consider that a coordinated, Offshore approach would be our preferred solution, to minimise onshore infrastructure. If this is proven to be undeliverable then the Council considers that support should be given to the Undergrounding the whole route.</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		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		
Project development process - Design				
3.2.5	Waveney Valley	<p>At the statutory consultation in 2024, the Applicant 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 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 (WaLOR) 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>SNDC Response to Targeted Consultations (03/03/2025):</p> <p>South Norfolk District Council wishes to express its significant disappointment at National Grid's decision to not pursue the undergrounding.</p> <p>South Norfolk District Council is of the view that there is a need to mitigate and offset the impacts of the scheme through the Waveney Valley, given that it meets, in principle, the criteria of NPS EN5 para 2.11.6. We considered that a scheme of landscape enhancement, should be used to offset (at least partially) the residual adverse impacts of the overhead lines that are now confirmed as being proposed for the Waveney Valley.</p>	Not Agreed
Project development process - Consultation				
3.2.6	2022 non-statutory consultation	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 5.1	SNDC agree the consultations were undertaken.	Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>Consultation Report – Appendix B: 2022 Non-Statutory Consultation [APP-068].</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>		
3.2.7	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 5.1 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>	SNDC agree the consultations were undertaken.	Agreed
3.2.8	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 5.1 Consultation Report – Appendix E: Statement of Community Consultation and Supporting Evidence [APP-072]. Responses to feedback received during statutory consultation are contained within 5.1 Consultation Report [APP-066].</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>	SNDC agree the consultations were undertaken.	Agreed
3.2.9	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</p>	SNDC agree the consultations were undertaken.	Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within 5.1 Consultation Report – Appendix K: Targeted Consultation 2025 [APP-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>		

Other matters as required

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	SNDC'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 [APP-126] and Section 8.6 of 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026].</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.</p>	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed
EIA – Approach and Methods				
3.3.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288 – 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
3.3.3	Data sources	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 [AS-026] . Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025, achieving coverage of 97% of the Order Limits.	SNDC agree that habitat survey coverage is sufficient to draw preliminary conclusions.	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant will continue to engage with SNDC on this matter.		
3.3.4	Assessment methodology	The assessment methodology was agreed through the EIA 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	The survey methodology was agreed through a Technical Note issued in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.	The survey methodology was agreed through a Technical Note issued in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.	Agreed
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 [AS-026] . The key parameters and assumptions presented are considered appropriate. The Applicant will continue to engage with SNDC on this matter.	SNDC consider that the parameters used are appropriate.	Agreed

EIA – Baseline Conditions

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 [AS-026] . The baseline conditions and receptors presented are considered appropriate. The potential for Meadow Wood to become a CWS was included in the future baseline and identified as 'an area of	SNDC request that the Meadow Wood CWS should be considered. It is likely ancient wood pasture and therefore irreplaceable habitat.	Under Discussion
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ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>land at Bunwell Hill'. At the time of writing the ES the site was not designated and its the future name of the CWS was not known to the Applicant. This area was identified as supporting veteran trees. Veteran trees were not identified as an ecological receptor in the Ecology and Biodiversity chapter, impacts to them were identified in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].</p> <p>The habitat present in the CWS was included in the baseline under the heading Lowland Mixed Deciduous Woodland a Habitat of Principal Importance. The ancient woodland inventory does not identify this area as ancient woodland pasture, nevertheless the Applicant identified the presence of veteran trees in the baseline in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].</p> <p>The detail of the mitigation measures for the CWS as with all ecological receptors is included in 7.4 Outline Landscape and Ecological Management Plan [REP3-303].</p> <p>The Applicant will continue to engage with SNDC on this matter.</p>		

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	<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 [AS-026]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The replacement planting and habitat creation in the Environmental Areas are considered to be Embedded Mitigation measures and part of the BNG assessment. Offsite BNG is considered enhancement.</p> <p>The Applicant through routeing has sought to avoid impacts to Meadow Wood CWS. Impacts to the CWS because of electrical clearance are identified in Table 5.4 in 7.4 Outline Landscape and Ecological Management Plan [REP3-303] with mitigation measures to protect Meadow Wood CWS specified. The Applicant will continue to engage with SNDC on this matter.</p>	<p>SNDC considers that the commitment to deliver 10% BNG is enhancement rather than embedded mitigation. The impacts on the Meadow Wood CWS remain to be assessed and addressed.</p>	Under Discussion
3.3.9	Standard mitigation	<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 [AS-026] and set out in the 7.2 Outline Code of Construction Practice [REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Can NG confirm that no habitats identified as suitable for reptiles will be removed between November and March, and whether, in line with best practice, RAMS will be put in place to avoid killing or injuring amphibians including GCN (e.g. if ponds require draining down). Please can NG confirm what compensation will be provided for trees with roost potential that are not found to contain</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>7.4 Outline Landscape and Ecological Management Plan [REP3-303] identifies the measures to safeguard biodiversity. For reptiles this includes restricting timings for vegetation clearance to avoid mortality to reptiles, avoiding the period November to March. For amphibians it identifies the measures required to protect them from killing and injury. 7.4 Outline Landscape and Ecological Management Plan is to be updated to identify that bat boxes would be provided and features provided in trees through veteranisation to mitigate for the loss of features suitable for use by bats, once the ratio for replacement is agreed with consultees. The Applicant will continue to engage with SNDC on this matter.</p>	<p>roosts to maintain continuity of roost provision?</p>	
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 8.6 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Table 5.4 in 7.4 Outline Landscape and Ecological Management Plan [REP3-303] identifies the impact that the Project would have on Meadow Wood CWS and identifies the mitigation measures required to avoid and reduce the scale of this effect. With respect to pre-commencement works 7.4 Outline Landscape and Ecological Management Plan (Revision E)</p>	<p>Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] directs the reader to the - The Outline LEMP (document reference 7.4) (Rev B) [REP-030] has been produced to detail the additional environmental measures that would be implemented to avoid, minimise, mitigate and compensate (ecology only). REP3-030 considers additional mitigation measures for Meadow Wood Nature Reserve CWS but these cannot be identified unless impacts have been adequately considered in Chapter 8. The OLEMP does not consider the impacts of pre-commencement works.</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>to be submitted at Deadline 5 includes the following text:</p> <p><i>All pre-commencement operations (as defined in Article 2(1) of the draft DCO (document reference 3.1) (Revision E)) must be carried out in accordance with the Outline LEMP. In doing so, where any measures referenced in the Outline LEMP are to be agreed with the relevant Local Planning Authority (LPA), National Grid and / or its Main Works Contractor(s) must seek the agreement of the relevant LPA before carrying out any pre-commencement operations to which those measures are relevant.</i></p> <p>The Applicant will continue to engage with SNDC on this matter.</p>		

EIA – Assessment Conclusions

3.3.11	Construction effects	<p>The assessment of effects during construction is presented in Section 8.7 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The assessment of effects during construction presented is considered appropriate.</p> <p>In this Chapter the habitat loss in the CWS was included in 'Table 8.23 Impact assessment including residual effects on ecology and biodiversity receptors during construction' under the heading Lowland Mixed Deciduous Woodland a Habitat of Principal Importance. The ancient woodland inventory does not identify this area as ancient woodland pasture, impacts to the veteran trees are identified in 6.13.A6 Environmental</p>	<p>SNDC request that this also needs to consider Meadow Wood Nature Reserve CWS.</p>	Under Discussion
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ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].</p> <p>Table 5.4 in 7.4 Outline Landscape and Ecological Management Plan [REP3-303] identifies the impact that the Project would have on Meadow Wood and identifies the mitigation measures required to avoid and reduce the scale of this effect.</p> <p>See BIO 1.3 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074], for further information.</p> <p>The Applicant will continue to engage with SNDC on this matter.</p>		
3.3.12	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in in Section 8.7 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>The only effect that the Project would have on Meadow Wood CWS during the operational (and maintenance) phase would be pruning to maintain electrical clearance this has been considered in the ES chapter in 'Table 8.24 Impact assessment including residual effects on ecology and biodiversity receptors during operation (and maintenance)'. See BIO 1.3 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074], for further information.</p> <p>6.8 Environmental Statement Chapter 8 -</p>	SNDC requests that this also needs to consider Meadow Wood Nature Reserve CWS. See comments to ExA Q2 re bird diverters.	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Ecology and Biodiversity [AS-026] identifies that bird diverters are to be used on a precautionary basis in two locations, there are no plans to apply this mitigation elsewhere on the Project, for the reasons provided in response to written questions, specifically BIO 1.13 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>The Applicant will continue to engage with SNDC on this matter.</p>		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP4-164] includes all relevant construction related mitigation measures specified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and is appropriate for managing construction impacts from the Project.</p> <p>The 7.2 Outline Code of Construction Practice Appendix A - Environmental Constraints Plan [APP-301] will be updated at Deadline 5 to also include the veteran trees.</p> <p>The 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] details that any clearance of vegetation for soil stripping will be in line with the requirements set out in 7.4 Outline Landscape and Ecological Management Plan [REP3-030], which includes measures for removal and disposal of non-native invasive species. The Soil Resource Plan developed by the Main Works Contractor(s) prior to commencement of</p>	<p>7.2 Outline Code of Construction Practice Appendix A - Environmental Constraints Plan (Final Issue A) [APP-301] - We would encourage the plan to include veteran trees as well as ancient woodland.</p> <p>7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (Final Issue A) [APP-303] In line with commitment B04 in the oCoCP we would encourage the oSRP to consider invasive non-native species (the outline waste management plan does).</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		development will reference the requirements for vegetation removal (including invasive non-native species).		
3.3.14	Outline LEMP	<p>The 7.4 Outline Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures specified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B - Clean Version of the ES [AS-026] and is appropriate.</p> <p>The Applicant's position on BNG is detailed in row 3.3.20.</p>	<p>SNDC in response to the 1st iteration of the oLEMP asked for each of the sections be separated for each district.</p> <p>SNDC in response to the 1st iteration of the oLEMP stated that the BNG hierarchy needs to be considered as part of the LEMP as enhancement of onsite habitats of medium, high, and very high distinctiveness would be expected to be delivered. Compensation is compulsory under the Environment Act and while BNG is expected to become statutory for NSIPs in Nov 2025, EN1 promotes its early adoption by NSIPs.</p>	Under Discussion
3.3.15	Protected Species Mitigation	<p>The Applicant provided a response to this matter at as outlined in 8.4.1 Applicants Comments on Relevant Representations [REP2-024].</p> <p>In April 2026, the Applicant received a Letter of No Impediment (LONI) from Natural England confirming '<i>Natural England sees no impediment to licences to derogate for impacts to water vole being issued</i>'.</p> <p>A signed Impact Assessment and Conservation Payment Certificate for Great Crested Newts (GCN) has also been obtained from Natural England and signed by the Applicant. This confirms that the Applicant will apply for a GCN District Level Licensing (DLL) post consent and</p>	<p>SNDC provided the following comments in the relevant representations on 27 November 2025:</p> <ul style="list-style-type: none"> The Outline CoCP and OLEMP propose appropriate mitigation for badgers, with 10 setts identified in South Norfolk and 5 unavoidable across the full route. Subject to implementation, impacts on badgers under the Protection of Badgers Act 1992 are not considered significant. District Level Licensing will mitigate impacts on Great Crested Newts and no other licences are anticipated at this stage. However, further ecological surveys will be required at detailed design. If reptile translocation is necessary, the receptor 	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		that Natural England agree to deliver the necessary mitigation.	site must be identified, secured and maintained for the lifetime of the scheme.	
3.3.16	Vegetation removal	<p>The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined in 8.4.1 Applicants Comments on Relevant Representations [REP2-024].</p> <p>7.2 Outline Code of Construction Practice (CoCP) [REP4-164] secured by Requirement 4 provides a structured process whereby vegetation removal is only determined following detailed survey, design refinement and plan approval (including any “site clearance” at pre-commencement stage). These measures ensure that decisions are informed by appropriate technical input and subject to formal approval by the relevant planning authority.</p> <p>With respect to pre-commencement works 7.4 Outline Landscape and Ecological Management Plan (Revision E) to be submitted at Deadline 5 includes the following text:</p> <p><i>All pre-commencement operations (as defined in Article 2(1) of the draft DCO (document reference 3.1) (Revision E)) must be carried out in accordance with the Outline LEMP. In doing so, where any measures referenced in the Outline LEMP are to be agreed with the relevant Local Planning Authority (LPA), National Grid and / or its Main Works Contractor(s) must seek the agreement of the relevant LPA before carrying out any pre-commencement operations to which those measures are relevant.</i></p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025:</p> <ul style="list-style-type: none"> • General authorisation to remove vegetation identified as “potentially affected” is inappropriate because it is ambiguous, too general and leaves the interpretation for National Grid’s decision resulting in a lack of clarity for enforcement purposes. <p>SNDC notes that pre-commencement works will be undertaken in advance of the detailed design. It is therefore possible that vegetation may be unnecessarily cleared should, for example, bell mouths be scoped out? Whilst this represents a worst case scenario, we would expect ecological surveys to be completed to inform the detailed design and not vice versa.</p> <p>While pre-commencement works will be undertaken under the OLEMP and OCoCP neither document specifically cover the works. It is not clear if BT or UKPN have been involved in their preparation</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		All third parties would undertake works under the DCO in accordance with the 7.2 Outline Code of Construction Practice (Revision E) and 7.4 Outline Landscape and Ecological Management Plan (Revision E) to be submitted at Deadline 5.		
3.3.17	Replacement Planting	Requirement 9(7) (reinstatement planting plan) in Schedule 3 of 3.1 Draft Development Consent Order [REP4-037] secures a five year replacement planting period for failed planting which is considered appropriate. For further details on the Applicant's position please refer to paragraphs 3.12.21 to 3.12.26 in the 8.8.1 Applicant's Comments on the Local Impact Reports [REP2-030] .	SNDC provided the following comments in the relevant representations on 27 th November 2025: <ul style="list-style-type: none"> Impose a ten-year replacement period for failed planting, consistent with other DCOs (e.g. Hornsea Three Offshore Wind Farm Order 2020 – see requirement 9). 	Not Agreed
Other matters as required				
3.3.18	Royden Fen CWS	<p>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes an ecological assessment of Royden Fen LNR and CWS. The assessment identifies, in the absence of mitigation, potential hydrological changes which may degrade habitats and associated groundwater dependent terrestrial ecosystems at Roydon Fen LNR and CWS. Standard pollution prevention mitigation measures set out within commitment GG32 of the 7.2 Outline Code of Construction Practice [REP4-164] are proposed to ensure no residual effects on the LNR and CWS are encountered.</p> <p>The Applicant provided a response to this matter at Deadline 2 through 8.8.2 The Applicant's</p>	<p>SNDC stated in the statutory consultation responses that Royden Fen CWS has been incorrectly identified as being located within Suffolk.</p> <p>It is not clear what the overhead line mitigation works involve and it is requested that the temporary attenuation drainage is re-designed to avoid the CWS, and a suitable buffer (works exclusion zone) provided around the CWS. The extent of hydrological impacts on the ecological interest of the CWS is of serious concern and must be clearly considered, for each CWS, within the ES.</p> <p>The inclusion of the CWS within the red line</p>	Not agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>comments on Local Impact Reports [REP2-030].</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>	<p>is contrary to EN-1 Overarching National Policy Statement for Energy which states that projects should follow the mitigation hierarchy and avoid harm. The CWS should be avoided in its entirety and a suitable buffer provided between the works area and CWS boundary.</p> <p>SNDC provided the following comments in the relevant representations on 27th November 2025</p> <p>The Council acknowledges that the route has largely been designed to avoid direct impacts on statutory designated sites, including Flordon Common SSSI, Forncett Meadows SSSI, Aslacton Parish Land SSSI and Shelfanger Meadows SSSI. However, their close proximity to the works raises concerns about potential indirect impacts during construction. Roydon Fen, a County Wildlife Site, is likely to experience direct impacts. While a compensation strategy via the Waveney and Little Ouse Recovery (WaOL) Project is proposed, no justification has been provided for why avoidance or mitigation measures were not considered. This lack of explanation is unacceptable. Compensation can only be acceptable if there are no alternative means of delivering the project without the harms or routes to harm.</p>	
3.3.19	Waveney Valley Alternative (WVA)	The Applicant has noted these comments and this item is under discussion. The Applicant has noted that the overhead line design has been	SNDC stated in the statutory consultation responses that there was concern about the ecological impacts of both the proposed	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		taken forward in this area that would minimise ecological impacts in the Waveney Valley.	overhead line and Waveney Valley Alternative and the potential for loss of irreplaceable habitats.	
3.3.20	Biodiversity Net Gain (BNG)	Although not currently mandatory for NSIP applications, the Applicant is committed to delivering a minimum of 10% BNG for the Norwich to Tilbury scheme. This 10% net gain will be delivered through a combination of on site and off site measures. The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025.	SNDC stated in the statutory consultation responses that BNG should be secured as part of the Development Consent Order and maintained for at least 30 years (if not the lifetime of the project).	Agreed
3.3.21	Arboriculture Impact Assessment (AIA)	<p>The Applicant issued the draft AIA in March 2025. The AIA has been prepared in accordance with the EIA 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and is considered appropriate.</p> <p>7.4 Outline Landscape and Ecological Management Plan [REP3-030] and 7.2 Outline Code of Construction Practice [REP4-164] both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable.</p> <p>The applicant confirms that site meetings and surveys are currently underway with the intention to reduce impacts to high value and veteran trees as part of detailed design. Commitment GG14 in 7.2 Outline Code of Construction Practice [REP4-164] confirms that for relevant parts of the Project, further arboricultural surveys will be undertaken to reduce impacts on trees and hedgerows, this is intended to inform any</p>	<p>South Norfolk Council is concerned that the Arboricultural survey has identified multiple significant trees that will be compromised by the current proposals; these include several irreplaceable veteran specimens.</p> <p>As the survey has been undertaken subsequent to the design of a route alignment, it is requested that a review is undertaken in light of the findings in order to address the first principle of mitigation – avoidance – in respect of the veteran and other most significant trees.</p> <p>It is disappointing the detailed survey data regarding the trees is not presented at this stage for our information.</p> <p>Detailed Arboricultural surveys will only be undertaken upon completion of the Detailed Design. Impacts cannot therefore be avoided as the design has been assured. In line with best practice detailed ecological and</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		additional measures needed where avoidance has not been possible, in line with the mitigation hierarchy.	arboricultural surveys must inform the detailed design to enable impacts to be avoided in the first instance.	

3.4 Air Quality

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Air Quality

ID	Matter	National Grid's Position	SNDC'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 Air Quality assessment is presented in 6.2 Environmental Statement Chapter 2 – Key Legislation and Planning Policy Context [APP-126] and Section 7.2 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	SNDC confirm agreement in this matter.	Agreed
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288 – 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 data has been collected to inform the assessment as presented within Section 7.4 of 6.7 Environmental Statement	SNDC understand that the AQ assessment was undertaken using data from the Annual Status Report which was gathered from our website. However, the data used in that	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Chapter 7 – Air Quality [APP-147]. The Applicant sought information from the South Norfolk ASR 2024 data set as highlighted in 6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [APP-149].</p>	<p>report would have been based on diffusion tube results. If the consultant had contacted us, we would have been able to supply much more accurate data which we have collected using our Zephyrs. While the diffusion tubes collect data for NO2, the Zephyrs provided data for PM10, PM2.5 and PM1 as well as for NO2. This is important data which the consultant could have used to develop a more accurate and detailed model of the existing air quality situation and the impact that the development will have.</p>	
3.4.4	Assessment methodology	<p>The methodology for assessing Air Quality was agreed through the EIA 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p>	<p>The methodology for assessing Air Quality was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed
3.4.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Air Quality are summarised in Section 7.4 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147]. The key parameters and assumptions presented are considered appropriate.</p> <p>The Applicant sought information from the South Norfolk ASR 2024 data set as highlighted in 6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [APP-149].</p>	<p>SNDC understand that the AQ assessment was undertaken using data from the Annual Status Report which was gathered from our website. However, the data used in that report would have been based on diffusion tube results. If the consultant had contacted us, we would have been able to supply much more accurate data which we have collected using our Zephyrs. While the diffusion tubes collect data for NO2, the Zephyrs provided data for PM10, PM2.5 and PM1 as well as for NO2. This is important data which the consultant could have used to develop a more accurate and detailed model of the</p>	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
			existing air quality situation and the impact that the development will have.	
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Air Quality are presented in Section 7.5 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] . The baseline conditions and receptors presented are considered appropriate. The Applicant sought information from the South Norfolk ASR 2024 data set as highlighted in 6.7.A2 Environmental Statement Appendix 7.2 Air Quality Baseline Data [APP-149] .	No contact has been made with SNDC to obtain our monitoring data.	Not Agreed
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 Air Quality effects, are set out in Section 7.6 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The use of a haul road and avoiding population centres is standard practice for this type of development. Further embedded measures should be included, including the judicious siting of compounds and designing the proposed works to minimise air pollution.	Under Discussion
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 7.6 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] and set out in 7.2 Outline Code of Construction Practice [REP4-164] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	The proposals are generally acceptable, however, the measures required at each point along the route will have to be designed in relation to the proposed works to be carried out at each location.	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 7.6 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	As the proposed method of construction has not been stipulated at this time, SNDC cannot agree that the additional mitigation will be appropriate and adequate.	Not Agreed
EIA – Assessment Conclusions				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 7.7 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] . The assessment of effects during construction presented is considered appropriate. The Applicant considers that through ongoing engagement between the parties, including the main works contractor, this matter can be moved to Agreed.	This is generally accepted. However, the main contractor will have to reassess the impact once the actual construction techniques are established.	Under Discussion
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 7.7 of 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] which considers the baseline conditions in Section 7.5 and proposed mitigation in Section 7.6 to present the residual effects for the assessment. The assessment of effects during operation (and maintenance) presented is considered appropriate.	This is not in this section but is agreed.	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP4-164] includes all relevant mitigation measures specified in 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] and is appropriate for managing construction impacts from the Project.</p> <p>Mitigation measures are outlined in the Dust Management Plan that forms part of 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] and in commitments AQ01 and AQ02 of 7.2 Outline Code of Construction Practice [REP4-164].</p>	The Outline Code of Construction Practice does not list the mitigation measures it merely points to the Air Quality Chapter.	Not Agreed
Other matters as required				

3.5 Noise and Vibration

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Noise and Vibration

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Noise and Vibration assessment is presented in 6.2 Environmental Statement Chapter 2 – Key Legislation and Planning Policy Context [APP-126] and Section 14.2 of 6.14 Environmental Statement Chapter 14 – Noise</p>	SNDC position following review of the ES documents is that this matter is agreed.	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>and Vibration [APP-256].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>		
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288 – 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
3.5.3	Data sources	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 14.4 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256].</p> <p>Lower thresholds, based on Category A of the 'ABC' method described in Annex E.3.2 of BS 5228 have been used in the construction noise assessment.</p>	No monitoring has been undertaken at all to provide details of the background noise levels.	Not Agreed
3.5.4	Assessment methodology	The methodology for assessing Noise and Vibration was agreed through the EIA 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The methodology for assessing Noise and Vibration was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with Noise and Vibration are summarised in Section 14.4 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256].</p> <p>The key parameters and assumptions presented are considered appropriate.</p>	The assessment has been based on the use of percussive piles for the foundations of the pylons while the geotechnical assessment has not been undertaken to detail which foundation method is more appropriate.	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Percussive piling has been assumed in the assessment as a worst-case. The use of an alternative method, where this can be done, would result in lower noise and vibration levels. Where percussive piling is required and an alternative method cannot be used, best practicable means (BPM) will be employed to reduce effects as far as possible. Specific mitigation measures will be determined by the contractor following their detailed assessments.</p> <p>The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the 7.2 Outline Code of Construction Practice [REP4-164] and the 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan (NVMP) [REP4-170].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of 7.2 Outline Code of Construction Practice [REP4-164]. 7.2 Outline Code of Construction Practice [REP4-164] also includes a number of other related commitments.</p> <p>At Deadline 4, Commitment NV23 [REP4-164] has been updated to clarify the position on percussive piling, stating:</p> <p><i>“For the construction of pylon foundations, non-percussive piling methods will be used, except where the results of ground investigations reveal</i></p>		

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p><i>that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing.”</i></p>		
EIA – Baseline Conditions				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Noise and Vibration are presented in Section 14.5 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The baseline conditions and receptors presented are considered appropriate.</p> <p>The assessment assumes that baseline noise levels are low along the route. As such, the lowest threshold for potential significant adverse effects from the ‘ABC’ method is used. There is therefore no need to undertake surveys. Surveys would only serve to potentially increase the threshold, where applicable. This is therefore proportionate, and worst-case.</p>	<p>The receptors have been identified but the base line noise levels have not been undertaken. The noise levels which the receptors would be subjected to has not been provided merely isolines of rough predicted noise levels.</p>	Not Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Mitigation (embedded, standard, additional)	<p>Embedded, standard and additional mitigation measures relevant to Noise and Vibration effects are set out in Section 14.6 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256].</p> <p>Embedded mitigation measures are designed as an inherent part of the Project relevant to Noise and Vibration effects, standard mitigation</p>	<p>The report does not propose any embedded mitigation measures as the report states that they will use BS5228 but that Main Works Contractor will decide on the proposed mitigation measures once they have done their own assessment. The vibration levels which have been chosen are mostly to stop</p>	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>measured are intended to reduce potential effects during construction.</p> <p>The assessment does not include mitigation such that noise and vibration 'hot-spots' can be identified where mitigation is required to avoid significant adverse effects. Best practicable means (BPM) will be employed by the contractor(s) to avoid significant adverse effects and reduce adverse effects.</p> <p>The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the 7.2 Outline Code of Construction Practice [REP4-164] and 7.2 Outline Code of Construction Practice Appendix F: Outline NVMP [REP4-170].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of 7.2 Outline CoCP [REP4-164]. 7.2 Outline Code of Construction Practice [REP4-164] also includes a number of other related commitments.</p> <p>With regards to "The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans", this is incorrect. The assessment considers both potential effects on people, as well as potential damage to buildings and structures.</p>	<p>damage to buildings rather than stopping nuisance to humans.</p>	

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA – Assessment Conclusions				
3.5.8	Construction effects	<p>The assessment of effects during construction is presented in Section 14.7 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment of effects during construction presented is considered appropriate.</p> <p>The assessment does not include mitigation such that noise and vibration ‘hot-spots’ can be identified where mitigation is required to avoid significant adverse effects. Best practicable means (BPM) will be employed by the contractor(s) to avoid significant adverse effects and reduce adverse effects.</p> <p>The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the 7.2 Outline Code of Construction Practice [REP4-164] and 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan [REP4-170].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of 7.2 Outline CoCP [REP4-164]. 7.2 Outline Code of Construction Practice [REP4-164] also includes a number of other related commitments.</p> <p>With regards to “The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to</p>	<p>The report does not propose any embedded mitigation measures as the report states that they will use BS5228 but that Main Works Contractor will decide on the proposed mitigation measures once they have done their own assessment. The vibration levels which have been chosen are mostly to stop damage to buildings rather than stopping nuisance to humans.</p>	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
3.5.9	Operational (and maintenance) effects	<p>humans”, this is incorrect. The assessment considers both potential effects on people, as well as potential damage to buildings and structures.</p> <p>The assessment of effects during operation (and maintenance) is presented in Section 14.7 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>With regards to “The operation effects were assessed, but the proposed line of pylons is not definite and is subject to change. As such the operation effects cannot be said to be truly quantified”, this is incorrect. A low noise ‘triple araucaria’ conductor system (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons) is proposed and committed to via commitment GG13 of 7.2 Code of Construction Practice [REP4-165]. Adverse effects from operational noise are not expected, even directly underneath the line. This is therefore the case irrespective of any movement within the Limits of Deviation (LoD). Although scoped out of the ES, information relating to operational noise from the overhead line is presented in 6.14 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines Informative [APP-261].</p>	The operation effects were assessed, but the proposed line of pylons is not definite and is subject to change. As such the operation effects cannot be said to be truly quantified.	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.10	Outline CoCP	<p>7.2 Outline CoCP [REP3-025] includes all relevant mitigation measures specified in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] and is appropriate for managing construction impacts from the Project. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the 7.2 Outline CoCP [REP4-164] and 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan [REP4-170].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of the 7.2 Outline CoCP [REP4-164]. The 7.2 Outline CoCP [REP4-164] also includes a number of other related commitments.</p>	<p>The CoCP includes generalities with regards to mitigation measures but also states that it will be the Main Contractors role to establish the mitigation measures. Therefore, the report is unacceptable.</p>	Not Agreed
Other matters as required				
3.5.11	Percussive Piling	<p>The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined in 8.4.1 Applicants Comments on Relevant Representations [REP2-024].</p> <p>With regards to “The project appears to rely entirely on percussive piling”, this is incorrect. Percussive piling has been assumed in the assessment as a worst-case. The use of an alternative method, where this can be done,</p>	<p>SNDC provided the following comments in the relevant representations on 27 November 2025</p> <ul style="list-style-type: none"> The project appears to rely entirely on percussive piling, which is a major source of noise and vibration nuisance. No justification for this approach has been provided and critically, no geo-environmental or geotechnical 	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>would result in lower noise and vibration levels. Where percussive piling is required and an alternative method cannot be used, best practicable means (BPM) will be employed to reduce effects as far as possible. Specific mitigation measures will be determined by the contractor following their detailed assessments. The contractor is committed to undertake additional detailed noise and vibration assessments based on their specific methodologies by commitment NV05 of the 7.2 Outline CoCP [REP4-164] and 7.2 Outline Code of Construction Practice Appendix F: Outline Noise and Vibration Management Plan [REP4-170].</p> <p>Additionally, the contractor(s) are committed to employing best practicable means to reduce the effects of construction noise and vibration by commitment NV01 of 7.2 Outline CoCP [REP4-164]. The 7.2 Outline CoCP [REP4-164] also includes a number of other related commitments. At Deadline 4, Commitment NV23 has been updated to clarify the position on percussive piling, stating:</p> <p><i>“For the construction of pylon foundations, non-percussive piling methods will be used, except where the results of ground investigations reveal that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing.”</i></p>	<p>investigations have been undertaken to confirm whether percussive piles are appropriate for site conditions. Without this information, the suitability of pile types cannot be established. Once pile types are confirmed, the noise and vibration assessment must be revised to reflect actual construction methods. The vibration assessment should also include impacts from construction traffic, consistent with approaches adopted in other DCOs such as Hornsea 3 Offshore Wind Farm. That assessment is currently missing.</p> <ul style="list-style-type: none"> • Percussive piling must be agreed with the LPA if intended for use, not just notified and should be avoided as a construction method. 	

Health and Wellbeing

Matters relating to Health and Wellbeing will be responded to by Norfolk County Council.

3.6 Historic Environment

Comments from SNDC regarding Historic Environment relate to Built Heritage only. SNDC defer to Norfolk County Council for archaeological advice.

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

ID	Matter	National Grid's Position	SNDC'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 Environmental Statement Chapter 11 – Historic Environment [AS-068].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	SNDC confirmed their agreement on this matter during a meeting 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 – 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>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
3.6.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] .	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.4	Assessment methodology	The Scoping Opinion stated: <i>“The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.”</i>	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.5	Key parameters and assumptions (General)	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 [AS-068] . The key parameters and assumptions presented are considered appropriate.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
3.6.6	Key parameters and assumptions (Viewpoints)	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 [AS-068] . The key parameters and assumptions presented are considered appropriate. Regarding the positioning of the viewpoints which have been discussed with the Council the Applicant has provided further information and updated visualisations in response to ExQ1 HE 1.13 as outlined in 8.9.1 Applicants Responses to First Written Questions [REP3-074] .	SNDC reserve comments on this matter subject to reviewing additional visualisations submitted by NG at Deadline 5.	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed following consideration of the additional viewpoints provided at Deadline 5.		
EIA – Baseline Conditions				
3.6.7	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 [AS-068] . The baseline conditions and receptors presented are considered appropriate.	SNDC confirmed their agreement on this matter during a meeting in January 2026.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.8	Embedded mitigation	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 [AS-068] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC does not consider this matter applicable for this topic as the nature of the activities is not going to damage assets.	Not Applicable
3.6.9	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] and set out in the 7.2 Outline CoCP [REP4-164] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC does not consider this matter applicable for this topic.	Not Applicable
3.6.10	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of 6.11	SNDC wish this matter to remain under discussion subject to further conversations	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Environmental Statement Chapter 11 – Historic Environment [AS-068]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Additional mitigation for built heritage would likely take the form of specific screening planting, which has been considered for any significant residual effects. However, the introduction of measures such as additional planting to screen the Project in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest.</p>	<p>anticipated in week 2 of ISH's.</p>	

EIA – Assessment Conclusions

3.6.11	Construction effects	<p>The assessment of effects during construction is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. The assessment of effects during construction presented is considered appropriate.</p>	<p>SNDC confirmed their agreement on this matter during a meeting in January 2026.</p>	Agreed
3.6.12	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>SNDC disagree with the level of harm that has been attributed and assessed on a number of heritage assets as set out in our Relevant Representation and Local Impact Report.</p>	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>The Applicant provided responses to SNDC regarding the conclusions of assessment for specific listed buildings in 8.4.1 Applicant's Comments on Relevant Representations (Rev B) [REP2-023]. For all other assets the Applicant understands SNDC to be in agreement with the conclusions of assessment. 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>		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.13	Outline CoCP	<p>The 7.2 Outline CoCP [REP4-164] includes all relevant construction mitigation measures specified in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] and is appropriate for managing construction impacts from the Project.</p>	<p>SNDC confirmed their agreement on this matter during a meeting in January 2026.</p>	Agreed
Other matters as required				
3.6.14	Church of All Saints	<p>The Applicant provided a response to this matter at Deadline 1 and 2 through the relevant representations process as outlined within 8.4.1 Applicant's Comments on Relevant Representations [REP2-033]. The Applicant has also provided further response regarding this asset in ExQ1 HE 1.18 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025</p> <ul style="list-style-type: none"> • Church of All Saints, Tibbenham (1049992) – Grade I (Sections 3.2.369 & 3.2.370) <ul style="list-style-type: none"> – The baseline report states that the church's setting is informed by its roadside location within Tibbenham and nearby village assets. However, this underplays its prominence: the church's substantial tower is highly 	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Statement Chapter 11- Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)144. As described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210], views to and from the asset from designated assets within its vicinity have been considered. Therefore, the conclusions of assessment for the Church of All Saints are considered to be appropriate.</p>	<p>visible across the parish to the west, including from Manor House and Diss Road. Approaching from Mill Road, views of the tower reinforce the important status of the building within the parish. The front elevation of Manor House (1179387) appears deliberately designed with bay windows to capture views of the church across open fields.</p> <ul style="list-style-type: none"> While the report acknowledges that the setting extends to the order limits with views to the northwest, it fails to recognise the church's role as a landmark within the wider parish setting and the intervisibility between heritage assets, which will be significantly compromised by pylons and wires. Given the church's high grade and value, the impact should be assessed as moderate adverse significant of effect, equating to mid less than substantial harm, not "lower less than substantial" as currently stated. <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	
3.6.15	Church of Remigius	<p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within 8.4.1 Applicant's Comments on Relevant Representations [REP2-033]. The Applicant has</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025</p> <ul style="list-style-type: none"> Church of Remigius (1050237) Grade I (3.2.403 & 3.2.404) 	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>also responded regarding this asset in the Applicant's Deadline 2 response to the Written Representation from Historic England, found in 8.8.1 Applicant's Comments on Written Representations [REP2-031], in response to paragraphs 2.17 – 2.23.</p> <p>The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)¹⁴⁵. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset with which the council appears to agree. The Applicant disagrees with the council's conclusion of assessment and considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate.</p>	<ul style="list-style-type: none"> – The setting is informed by “its location on the northern edge of the Waveney Valley with views over the valley to the south.” For much of its history the church was set within a rural location, and although there is urban development, the aspect to the south remains rural and well preserved. The pylons and wires will have a significant and intrusive detrimental impact on the relationship of the church with its rural hinterland to the south that is well preserved, including views of the church from the Angles Way footpath. Although the assessment states that the setting makes a moderate contribution, this has taken into account the change to the rural setting to the north as part of the setting, however the setting to the south remains preserved and therefore 7 continues to make a considerable contribution to the significance of the asset as the remaining well preserved element of the setting. There is moderate adverse significant of effect and therefore significant, and the level of harm should be mid less than substantial harm. <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	

ID	Matter	National Grid's Position	SNDC's Position	Status
3.6.16	Kenningham Hall	<p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within 8.4.1 Applicant's Comments on Relevant Representations [REP2-033].</p> <p>The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)146. The Applicant disagrees with the council and considers the current assessment to be appropriate.</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025</p> <ul style="list-style-type: none"> • Kenningham Hall (1373056) – Grade II (Section 3.2.472) <ul style="list-style-type: none"> – During the operational phase, the proximity of industrial pylons will cause a significant visual intrusion into the hall's setting, which currently makes a considerable contribution to its value. Despite some vegetation, the scale and closeness of pylons and wires will remain highly visible from all directions. The impact should not be considered moderate adverse harm and significant and thus should equate to mid less than substantial harm and not low substantial harm. <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	Not Agreed
3.6.17	Elm Farmhouse	<p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within 8.4.1 Applicant's Comments on Relevant Representations [REP2-033].</p> <p>The discrepancy between the Environmental Impact Assessment, as presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210] and the assessment of harm, as presented in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025</p> <ul style="list-style-type: none"> • Elm Farmhouse (1373558) – Grade II (Sections 3.2.574 & 3.2.575) <ul style="list-style-type: none"> – The farmhouse's setting is defined by its agricultural and rural context, which contributes considerably to its significance. The proximity of pylons and wires will substantially alter this setting, resulting in moderate adverse 	

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Designated Heritage Assets [APP-215] and the incorrect compass direction have been addressed in 8.1 Errata List. The assessment of harm now reads as follows: 'The Grade II Listed 'Elm Farmhouse' is located west of Hapton. During the operation phase, the Project would be partially within the setting of the medium value asset. The operation phase of the Project would impact the asset's setting through the introduction of pylons RG27-29, the closest of which (RG28) would be located c. 190 m north-north-west of the asset. The setting of the asset is informed by the surrounding agricultural landscape, with which the asset has a historical relationship and possibly ongoing functional relationship. The setting is further informed by the asset's surviving non-designated outbuildings to the east and west and which are recorded on the first edition OS map of 1884. The Project would impact the views of the agricultural landscape to the north-north-west (RG28) as the pylon would be visible above the hedgerow which defines the asset's garden, and to the south-west where pylon RG29 is located c. 220 m away. The Project would result in a small change to the setting of the asset resulting in a minor impact on its value. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.' The Applicant considers the assessment of Elm Farmhouse to be appropriate.</p>	<p>significant of effect and significant, not "minor adverse" as stated. The conclusion of mid less than substantial harm is appropriate. Note: Elm Farmhouse is located west of Hapton, not East.</p> <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	
3.6.18	Manor House	<p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within 8.4.1</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025</p>	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Applicant's Comments on Relevant Representations [REP2-033]. The Applicant has also provided further response regarding this asset in ExQ1 HE 1.18 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The assessment of Manor House (1179387) has been reviewed and the Applicant is confident in its Lower Less Than Substantial Harm assessment for Manor House (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) and minor adverse (not significant) effect (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]).</p> <p>While the view from the asset back towards the bell tower of Church of All Saints (1049992) would include overhead wires should the Project go ahead the church is c. 1.3 km to the east of the asset and therefore a comparatively distant feature in views.</p>	<ul style="list-style-type: none"> • Manor House (1179387) – Grade II <ul style="list-style-type: none"> – Currently assessed as “minor adverse” significant of effect and therefore not significant underestimates the importance of intervisibility with Tibbenham Church. The House’s front elevation, including bay windows, appears deliberately oriented to capture views of the church tower across open fields. This design intention amplifies the significance of the relationship. The impact should be moderate adverse significance of effect, equating to mid less than substantial harm. <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	
3.6.19	Flordon Hall	The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined within 8.4.1	SNDC provided the following comments in the relevant representations on 27 th November 2025	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Applicant's Comments on Relevant Representations [REP2-033].</p> <p>The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Should the Project go ahead, it would result in the addition of five pylons (RG19-RG23) within 1 km of the asset. The pylons would run on a north-east/south-west alignment from the north of the asset (RG19) to the south-west of the asset (RG23). At its nearest point (RG21) the Project would be c. 270 m to the north-west of the asset. It is acknowledged that the Project would traverse farmland still likely associated with the Hall and associated farmstead. As described in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] the intervening landscape between the asset and Project includes buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon</p>	<ul style="list-style-type: none"> • Flordon Hall (1050698) – Grade II* <ul style="list-style-type: none"> – Flordon Hall's setting is informed by its agricultural landscape and historic farmyard. Built c.1600 by the Kemp family, its E-shaped plan facing East was a conscious design statement intended to be viewed across open farmland, particularly from Long Lane. The Tithe Map of c1840 shows the fields between Long Lane and Hall marked with K which can be taken as being owned by the Kemps and associated with the Hall. Pylons and wires, while not blocking views, will introduce a dominant presence, undermining this design intention. Given the asset's high grade and 8 significance, the harm should be considered high less than substantial harm. <p>SNDC agree to disagree with the level of harm that has been attributed to these assets</p>	

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Hall (1373055)). The asset can be viewed from Long Lane c. 480 m to the south-east, and this view would potentially include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. This is because the Upper Less Than Substantial Harm category requires: '...changes within the setting of the designated asset (or elements of its setting) that contribute to its value would significantly alter a large proportion of the setting of the asset that contributes to its value.', as set out in the methodology which was informed by PPG paragraph 18 (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The Applicant is confident the level of harm to the asset does not meet this threshold.</p>		

3.7 Landscape and Visual

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	SNDC'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 Landscape and Visual 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 [APP-226].</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.</p>	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed
EIA – Approach and Methods				
3.7.2	Study area	<p>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].</p>	<p>The study area for assessing Landscape and Visual was agreed through the EIA Scoping Report and the Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops.</p> <p>In the meeting held on 3rd December 2024, the viewpoints, with the exception of the Waveney Valley, were discussed and agreed by the representatives of NCC and SNDC. SNDC would want to review any further potentially significant changes to the project and be given the opportunity to consider any changes needed to the viewpoints.</p>	Agreed
3.7.3	Data sources	Sufficient desktop and survey data (excluding	SNDC position following review of the ES	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		viewpoints) has been collected to inform the assessment as presented within Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] .	documents is that this matter is agreed.	
3.7.4	Assessment methodology (including LVIA methodology and viewpoints)	The assessment methodology is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] . 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] .	The outline methodology for assessing Landscape and Visual was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic workshops. In the meeting held on 3 rd December 2024, the viewpoints, with the exception of the Waveney Valley, were discussed and agreed by the representatives of NCC and SNDC. SNDC would want to review any further potentially significant changes to the project and be given the opportunity to consider any changes needed to the viewpoints.	Agreed
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . The key parameters and assumptions presented are considered appropriate.	SNDC position following review of the ES documents is that this matter is agreed.	Agreed
EIA – Baseline Conditions				
3.7.6	Baseline conditions and receptors	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 [APP-226] . The baseline conditions and receptors presented are considered appropriate.	SNDC position following review of the ES documents is that this matter is agreed.	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	<p>Embedded 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 [APP-226]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	SNDC position pending full review of the ES documents.	Under Discussion
3.7.8	Standard mitigation	<p>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. 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 [APP-226] and 7.2 Outline CoCP [REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	SNDC position pending full review of the ES documents.	Under Discussion
3.7.9	Additional mitigation	<p>Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of 6.13 Environmental Statement Chapter 13 -</p>	SNDC position pending full review of the ES documents.	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
<p>Landscape and Visual [APP-226]. The Applicant's position on landscape mitigation and compensation is set out in Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>				
<p>EIA – Assessment Conclusions</p>				
3.7.10	Construction effects	<p>The assessment of effects during construction is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and supporting appendices. The assessment of effects during construction presented is considered appropriate.</p>	<p>SNDC position pending full review of the ES documents.</p>	Under Discussion
3.7.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and supporting appendices. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>SNDC position pending full review of the ES documents.</p>	Under Discussion
<p>Draft DCO / Outline Management Plans / Mitigation and Monitoring</p>				
3.7.12	Outline CoCP	<p>The 7.2 Outline Code of Construction Practice [REP4-164] includes all relevant construction related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and is appropriate for managing construction impacts from the Project.</p>	<p>The content of the oCoCP is still under discussion. SNDC position pending full review of the ES documents.</p>	Under Discussion
3.7.13	Outline LEMP	<p>The Outline Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures</p>	<p>The content of the oLEMP is still under discussion. SNDC position pending full review of the ES documents.</p>	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and is appropriate.		
Other matters as required				
3.7.14	Pre-construction condition surveys	<p>The Applicant provided a response to this matter at Deadline 1 as outlined in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. The correct wording is provided in the Outline CoCP [REP4-164] and Paragraph 13.6.6 was corrected in 8.1 Errata List [REP1-071] as follows: <i>"Pre-construction condition surveys will be undertaken prior to the construction period..."</i></p> <p>The Applicant suggests this matter can be moved to Agreed</p>	<p>Relevant Representation: Paragraph 13.6.6 – LV02 proposes: "Pre-construction condition surveys will be undertaken during the construction period..." This appears contradictory and requires clarification.</p>	Agree
3.7.15	Reinstated Habitat Monitoring	<p>The Applicant provided a response to this matter at Deadline 1 as outlined in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. The Applicant considers the five-year monitoring period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects. The monitoring period is adaptive, as stated within the 7.4 Outline Landscape and Ecological Management Plan [REP3-030] which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure.</p>	<p>Relevant Representation: Paragraph 13.8.1 – Reinstated habitats are proposed to be monitored for only five years. The Council requests this period be extended to 10 years, consistent with other DCOs and local planning permissions, with management continuing for the lifetime of the scheme.</p>	Not agreed

3.8 Socio-economics, Recreation and Tourism

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	SNDC's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socioeconomics, 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 [APP-265] .	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed
EIA – Approach and Methods				
3.8.2	Study area	The Scoping Opinion stated <i>“The Applicant should seek to agree the study area with the relevant local authorities”</i> . Following meeting held in November 2024, it was agreed that the study area for businesses was expanded from 1km-3km to take into capture potential visual effects on businesses.	Study area was agreed through the meeting held on 14 November 2024.	Agreed
3.8.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] .	SNDC acknowledge the assessment was undertaken in line with current legislation.	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
3.8.4	Assessment methodology	The 6.20 Scoping Opinion [APP-297] stated <i>“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”</i> .	SNDC confirm their agreement on the matter and note the inclusion of the Review of the Aviation Impact in the ES as requested.	Agreed
3.8.5	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 [APP-265] . The key parameters and assumptions presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed
EIA – Baseline Conditions				
3.8.6	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 [APP-265] . The baseline conditions and receptors presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	Embedded mitigation	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 [APP-265] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to	SNDC's position is that the Waveney Valley Alternative for undergrounding was discontinued and so we feel that the embedded mitigation of the scheme is not sufficient to avoid socioeconomic impacts in the Waveney Valley area.	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		address potential effects.		
3.8.8	Standard mitigation	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 [APP-265] and set out in 7.2 Outline CoCP [REP4-164] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC acknowledgeWai and agree with the level of standard mitigation for the project	Agreed
3.8.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 15.6 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC confirm their agreement on this matter, so long as mitigation is flexible to capture local events.	Agreed
EIA – Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] . The assessment of effects during construction presented is considered appropriate.	SNDC asking for clarification on the tourism assessment in the ES.	Under Discussion
3.8.11	Operational (and maintenance) effects	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 [APP-265] . The assessment of effects during	Matter still under discussion	Under Discussion

ID	Matter	National Grid's Position	SNDC's Position	Status
		operation (and maintenance) presented is considered appropriate.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	The 7.2 Outline CoCP [REP4-164] includes all relevant construction related mitigation measures specified in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] . and is appropriate for managing construction impacts from the Project.	The content of the CoCP is still under review and discussion.	Under Discussion
Other matters as required				
3.8.13	Skills and employment plan	<p>In 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 has engaged with the host authorities and submitted 8.13 Outline Employment and Skills Plan [Revision A] 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.</p> <p>The Applicant considers that through the ongoing engagement between the parties, this matter can be moved to Agreed.</p>	SNDC position is that a Skills and Employment plan was requested and has been provided.	Agreed

3.9 Cumulative Effects

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	SNDC'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 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 [APP-281].</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>	SNDC confirm their agreement on this matter.	Agreed
EIA – Approach and Methods				
3.9.2	Study area	The study area was agreed through the EIA 6.19 Scoping Report [APP-288 – 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
3.9.3	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 [APP-281] .	Given additional information subsequently provided by the Applicant, SNDC agree this matter	Agreed
3.9.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		Report and Scoping Opinion [APP-288 to APP-297] received from the Planning Inspectorate.	Report and Scoping Opinion received from the Planning Inspectorate.	
3.9.5	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 [APP-281] . The key parameters and assumptions presented are considered appropriate.	Given additional information subsequently provided by the Applicant, SNDC agree this matter	Agreed
EIA – Baseline Conditions				
3.9.6	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 [APP-281] . The baseline conditions and receptors presented are considered appropriate.	SNDC confirm their agreement on this matter.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Section 17.6 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SNDC position following review of the ES documents is that this matter is not agreed.	Not Agreed
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in Section 17.6 of 6.17 Environmental Statement Chapter 17 –	SNDC position following review of the ES documents is that this matter is not agreed.	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>Cumulative Effects [APP-281] and set out in 7.2 Outline CoCP [REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>		
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 17.6 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update (Final Issue A) [REP4-163]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	SNDC position following review of the ES documents is that this matter is not agreed.	Not Agreed
EIA – Assessment Conclusions				
3.9.10	Construction effects	<p>The assessment of effects during construction is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update (Final Issue A) [REP4-163]. The assessment of effects during construction presented is considered appropriate.</p>	SNDC position following review of the ES documents is that this matter is not agreed.	Not Agreed
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update (Final Issue A) [REP4-163]. The assessment of effects</p>	SNDC position following review of the ES documents is that this matter is not agreed.	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		during operation (and maintenance) presented is considered appropriate.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	The 7.2 Outline CoCP [REP4-164] includes all relevant construction related mitigation measures specified in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and is appropriate for managing construction impacts from the Project.	The content of the CoCP is still under review and discussion.	Under Discussion
Other matters as required				
3.9.13	Large-scale energy infrastructure	Cumulative effects with the Sheringham and Dudgeon Offshore Wind Farm Extensions (EN010109) were assessed within 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284], ID DCO6 . Cumulative effects with East Pye Solar Farm and BESS (EN0110014) were considered within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] . This project did not fall within the Zones of Influence for environmental topics; therefore, the project was not assessed further. Cumulative effects with Hornsea Three Offshore Wind Farm (EN010080) were assessed in the inter-project cumulative effects assessment within 6.17.A3 Environmental Statement Appendix 17.3 Inter Project Cumulative Effects [APP-284], ID DCO1 . Updates to timeframes of construction and operation of the other development since the	SNDC provided the following comments in the relevant representations on 27 th November 2025: <ul style="list-style-type: none"> • The Council notes a concentration of large-scale energy infrastructure proposals and consents within South Norfolk and the wider Norwich area, including: <ul style="list-style-type: none"> – Tasway Energy Park – 700MW Solar and Battery Energy Storage System (BESS) NSIP (Phase One consultation ongoing). – East Pye – 500MW Solar and BESS NSIP (formal submission anticipated in the New Year). – Consented and proposed TCPA renewable energy schemes around Norwich Main and along the proposed pylon route. 	Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
		<p>original assessment was undertaken have been considered and updates to the conclusions of the cumulative effects assessment will inform updates to the 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at Deadline 1.</p> <p>The Project has been made aware of Tasway Energy Park since the submission of the Development Consent Order application. The development has been captured and assessed within an updated inter-project cumulative effects assessment, documented in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update (Final Issue A) [REP4-163]</p>	<ul style="list-style-type: none"> – Orsted Hornsea Project Three Offshore Windfarm NSIP cable routes and converter station northwest of Norwich Main; – Equinor Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (SEP and DEP) cable routes and converter station south of Norwich Main 	
3.9.14	Existing pylon network	<p>Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed, as set out in Section 13.5 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process as outlined in Appendix AA of 8.4.1 Applicant's Comments to Relevant Representations [REP2-023].</p> <p>The cumulative effects of the Project have been assessed within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] which includes cumulative effects on landscape and visual receptors and heritage assets.</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025:</p> <ul style="list-style-type: none"> • The existing network of pylons running from Norwich into Suffolk already imposes a significant visual presence. The proposed Project will introduce an additional line of pylons in close proximity to the existing network, resulting in two parallel lines dominating the rural landscape. This raises serious concerns regarding: <ul style="list-style-type: none"> – Harm to rural character and visual amenity; – Adverse effects on the setting of heritage assets. 	Not Agreed

ID	Matter	National Grid's Position	SNDC's Position	Status
3.9.15	Existing Infrastructure	<p>Existing overhead lines are considered as part of the landscape and visual baseline, against which the effects of the Project are assessed, as set out in Section 13.5 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>The Applicant provided a response to this matter at Deadline 1 through the relevant representations process (8.4.1 Applicant's Comments to Relevant Representations [REP2-023]).</p>	<p>SNDC provided the following comments in the relevant representations on 27th November 2025:</p> <p>The Council is concerned that the cumulative effect of these Projects, together with existing infrastructure, will result in:</p> <p>Landscape and Heritage Harm as a result of industrial-scale infrastructure incompatible with rural character; Ecological Impact as a result of potential loss of habitats and biodiversity.</p> <p>Community Disruption due to noise, disturbance and disruption during construction and operation phases;</p> <p>Economic Consequences due to negative impacts on local businesses and tourism e.g. South Norfolk with its Market Towns of Diss, Harleston, Loddon and Wymondham; numerous Heritage assets including medieval churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes which provide a rich tourism/visitor offer.</p> <p>Any reduction in visitor numbers due to disruption or diminished attractiveness of the area will negatively affect hospitality, retail and cultural sectors.</p>	Not Agreed

3.10 Development Consent Order

The matters below are still under discussion between both parties.

Table 3.10 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 [REP4-037]**.

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.1	DCO Requirements - Interpretation	<p>The intention of paragraph 1(3) of Schedule 3 to 3.1 Draft DCO (Revision D) [REP4-037] is to clarify that the Applicant will be in 'accordance' or 'general accordance' with an approved plan if it is in 'accordance' or 'general accordance' with any details that are approved by the relevant discharging authority following a re-submission of a Requirement for discharge. It is not intended to authorise the relevant authority to discharge Requirements that facilitate a material change. Indeed, the management plans to be approved under Requirement 4, for example, must be in substantial accordance with the outline management plans.</p> <p>Likewise, any amendments authorised by the discharging authority under an 'unless otherwise agreed' tailpiece are limited by the need to demonstrate to the relevant authority that the proposed amendment would not result in any materially new or materially different environmental effects to those reported on in the Environmental Statement.</p> <p>The Applicant proposes this matter is moved to Agreed.</p>	<p>The Council considers Schedule 3, paragraph 1(3), which allows for amendments approved in writing by the relevant discharging authority, should be more tightly drafted. While the requirement for the authorised development to be carried out "in general accordance with" approved plans or documents provides some flexibility, this cannot be construed as permitting material changes. The phrase "in general accordance with" should be restricted to de minimis variations only i.e. those that do not alter the substance or intent of the approved scheme. The current wording would undermine the certainty and integrity of the consent process, effectively enabling significant departures without proper scrutiny or procedural safeguards.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.2	DCO Requirements – Construction management plans	<p>The Applicant notes the Council's comment that additional consultees, such as the Local Highway Authority or the Environment Agency, should also be included in relation to the discharge of Requirement 4 (Construction management plans). The Applicant has updated 3.1 Draft DCO (Revision D) [REP4-037] to include the local highway authority and the relevant highway authority as a named consultee in the context of the strategic road network and the Environment Agency in respect of the code of construction practice.</p> <p>7.3 Outline Construction Traffic Management Plan [REP3-028] details the engagement with Local Highway Authorities and other stakeholders for any changes within the Outline CTMP. The Local Highway Authority then has 28 days to confirm its consent to the change, to provide reasons why the change is not accepted.</p> <p>The Applicant proposes this matter is moved to Agreed.</p>	<p>There is a need for additional consultees. For example, only Natural England is listed in Requirement 4(1) as a consultee for landscape and ecology. Additional consultees should include:</p> <ul style="list-style-type: none"> • Environment Agency; • Local Highway Authority; • National Highways (where strategic networks are affected). <p>Construction Traffic Management Plans, for example, must be agreed with the Highway Authority and National Highways.</p>	Under Discussion
3.10.3	DCO Requirements – Stages of authorised development	<p>Given the programme to which the Project has to be delivered, a requirement of a phasing programme for the entire scheme before the carrying out of any pre-commencement operations would be disproportionate and could frustrate the delivery. It is agreed that phasing should be confirmed prior to commencement of construction.</p>	<p>It is unclear why a phasing plan cannot be required prior to commencement. This would provide clarity and certainty for stakeholders. As currently drafted, Requirement 3(1) and (2) appear potentially contradictory, as activities defined as 'pre-commencement' may themselves constitute development. To avoid ambiguity, the sequence should be revised so that (1) precedes (2), ensuring the phasing plan is agreed before any works begin.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.4	DCO Requirements - Archaeology	<p>The Applicant has amended 3.1 Draft DCO (Revision D) [REP4-037] to remove the definition of “discharging authority” and has provided a new two-limb definition of ‘relevant planning authority’ which removes any ambiguity by making clear that in a two-tier area, the district planning authority is the primary discharging body; and includes a separate definition of “relevant county planning authority” who is named as a consultee where county-level expertise is relevant.</p> <p>The Applicant proposes this matter is moved to Agreed.</p>	<p>For Norfolk this Requirement falls under the remit of the Historic Environment Service currently the responsibility of the County and which has engaged with National Grid.</p> <p>This matter is considered to be subject to further discussion, SNDC consider that use of the term ‘relevant archaeology service’ would be more appropriate as the county tier of planning authority do not have a planning remit for archaeology.</p>	Under Discussion
3.10.5	DCO Requirements – Design and layout plans (elevations)	<p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility in design to respond to such final design proposals as will be agreed with the relevant authority as prescribed in 3.1 Draft DCO (Revision D) [REP4-037].</p> <p>The Applicant notes the authority’s comment relating to the clarificatory wording in Requirement 6 of the 3.1 Draft Development Consent Order [APP-056], but does not agree that its inclusion authorises reliance on paragraph 1 to go beyond minor, non-material adjustments.</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>	<p>The phrase ‘general accordance’ is unacceptable. In the absence of anything more than illustrative or approximate details, any details submitted as part of the discharge of Requirements must either be in accordance with specific proposals or subject to further approval. The council have asked to be provided with the details of the construction laydown areas and satellite construction compounds. If those details were to be provided, the Council would accept ‘in general’ accordance with to allow for de minimis variations.</p> <p>This narrow reading is reinforced by Requirement 6, which governs design and layout plans (elevations). Requirement 6(1) mandates that the authorised development must be carried out “in general accordance” with the approved design and layout plans, while Requirement 6(2) appears to clarify that any departure resulting in materially new</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.6	DCO Requirements – Construction hours	<p>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].</p> <p>Requirement 7 (Construction Hours) of the 3.1 Draft DCO (Revision D) [REP4-037] 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.</p> <p>The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</p> <p>The construction working hours set out in 3.1</p>	<p>or materially different environmental effects would fall outside this flexibility. Accordingly, the interpretation provision should not be used to justify changes that go beyond minor, non-material adjustments, as doing so would conflict with the express limitation in Requirement 6(2).</p> <p>Current wording allows work on Bank Holidays and Sundays, which is inconsistent with other DCOs. Standard practice is:</p> <ul style="list-style-type: none"> • Monday–Friday: 07:00–19:00 • Saturday: 07:00–13:00 • No working on Sundays or Bank Holidays <p>Other NSIPs with similar urgency (e.g. Hornsea, Equinor and RWE) have managed delivery without resorting to routine Sunday and Bank Holiday working. If work needs to be carried out outside approved hours, the Applicant can apply for prior consent for construction works under section 61 Environmental Protection Act 1990. It allows the Applicant to apply to the local authority for prior consent to carry out works that might otherwise cause a statutory nuisance under Part III of the Act. This has been an effective way of managing works needed on Sundays and Bank Holidays in the DCO projects referred to above whilst managing amenity impacts. The requirement should be worded so as to limit the hours but to allow of exceptions where EPA consent is granted.</p> <p>National urgency does not override the</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>Draft DCO (Revision D) [REP4-037] define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in 7.2 Outline Code of Construction Practice [REP4-164].</p> <p>The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays / bank holidays would materially harm the deliverability of this critical national priority project.</p> <p>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based</p>	<p>principle of reasonable mitigation for local impacts. The National Policy Statement and standard DCO practice require minimising adverse impacts on local amenity. Continuous working would go beyond that which was assessed in the Environmental Statement, introducing unassessed harm.</p>	

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		<p>the assessment on the core working hours proposed, which would include start-up and close-down activities taking place up to one hour either side of the core hours, and activities which can take place outside the core working hours. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice [REP4-164], significant effects from noise and vibration during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft DCO (Revision D) [REP4-037] within the final Code of Construction Practice.</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>		
3.10.7	DCO Requirements - Retention and removal of trees, woodland and hedgerows	<p>Requirement 4 in Schedule 3 to the 3.1 Draft DCO (Revision D) [REP4-037] covers 7.4 Outline Landscape and Ecological Management Plan [REP3-030] which does not show all the trees and hedgerows that will be removed by the Project. 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325] shows outline landscape proposals for non-linear permanent infrastructure. Conversely, Requirement 8 requires the Applicant to advise which trees and hedgerows will be affected along the entire route alignment.</p>	Plans showing trees for retention or removal are already submitted for approval as part of requirement 4. It is unclear why this Requirement is needed against that background and context.	Under Discussion

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3.10.8	DCO Requirements – Reinstatement planting plan	<p>The reference to 'reinstatement' is to the reinstatement of the land prior to that part of the authorised development being brought into operational use. The drafting makes clear that the latest point at which the reinstatement planting works may be carried out is the first available planting season after the relevant part of the authorised development is brought into operational use.</p> <p>The Applicant does not consider it necessary to amend the wording of Requirement 9(4). The Applicant may find itself in a situation where it could carry out reinstatement planting in the current planting season, rather than waiting until the next planting season.</p> <p>The Applicant has proposed a five-year replacement period that is consistent with recent National Grid Development Consent Orders (DCOs) including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Section 10 (Aftercare) of 7.4 Outline Landscape and Ecological Management Plan [REP3-030] addresses the aftercare procedures. The Applicant notes that a 10-year replacement period is not standard practice for DCOs or planning permissions, where a five-year establishment and replacement period is typically applied and is widely accepted as sufficient to secure successful establishment.</p>	<p>The Heading to, and the text of Requirement itself should not contain the word "reinstatement" because it should encompass planting plans that may or may not include reinstatement.</p> <p>Requirement 9(4) – term "earliest opportunity" creates ambiguity about in whose opinion the earliest opportunity may be. It should be defined as the "next planting season" for clarity.</p> <p>Requirement 9(7) - A 10-year replacement period is required to allow establishment, consistent with other DCOs and planning consents. This was agreed under Hornsea following evidence on Norfolk's climate and planting challenges, as a result of the uniquely dry and sandy ground conditions in Norfolk.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.9	DCO Requirements – Reinstatement schemes	<p>The 21-month period links back to the time period in Article 27 (Temporary use of land by National Grid) and Article 28 (Temporary use of land by UKPN) of 3.1 Draft Development Consent Order [REP4-037], in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.</p> <p>The Applicant proposes this matter is moved to Agreed.</p>	<p>The Council doesn't understand why a period of 21 months is provided for. It could be a typo, and the Applicant meant to refer to 12 months, so this should be clarified.</p>	Under Discussion
3.10.10	DCO Requirements – Additional requirements	<p>Table 6.1 of 7.2 Outline Code of Construction Practice [REP4-164] includes commitment GG26 to control and minimise construction lighting to reduce disturbance to residential and ecological receptors. On the matter of noise and vibration control, 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP 306] is provided as an appendix to 7.2 Outline Code of Construction Practice [REP4-164] and contains measures to control and mitigate noise and vibration during construction. Measures to mitigate other potential construction effects upon residential amenity are also set out as commitments within 7.2 Outline Code of Construction Practice [REP4-164], for dust. 7.2 Outline Code of Construction Practice [REP4-164] is secured by Requirement 4 of 3.1 Draft DCO (Revision D) [REP4-037].</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>The Council considers that several essential matters have not been adequately addressed within the present suite of Requirements in the Draft DCO and has requested additional or expanded Requirements in relation to</p> <ul style="list-style-type: none"> • Implementation and maintenance of landscaping; • Contaminated land and groundwater management; • Noise control measures; • Control of critical light emissions. 	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.11	DCO Requirements – Additional requirements	<p>Commitment GG22 in 7.2 Outline Code of Construction Practice [REP4-164] 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 [REP4-186], submitted at Deadline 1 and updated at Deadline 4, 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.</p>	<p>The Council considers that several essential matters have not been adequately addressed within the present suite of Requirements in the Draft DCO and has requested a Drainage Strategy, including surface and foul water management.</p>	Under Discussion
3.10.12	DCO Requirements – Additional requirements	<p>Commitment GG29 in 7.2 Outline Code of Construction Practice [REP4-164] commits to appropriate fencing. The type of fencing installed will depend on the area to be fenced and will take into consideration the level of security required in relation to the surrounding land and public access, rural or urban environment and arable or stock farming. Permanent fencing is addressed in 7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP4-183].</p> <p>Given the scale and length of the Project, it would be a disproportionate administrative and practical burden on the Applicant and the relevant authority to include a requirement for discharge relating to something so specific as temporary fencing and means of enclosure.</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>	<p>The Council considers that several essential matters have not been adequately addressed within the present suite of Requirements in the Draft DCO and has requested additional or expanded Requirements in relation to Fencing and Means of Enclosure (including temporary construction compounds).</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
3.10.13	DCO Requirements – Additional requirements	<p>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 has engaged with the host authorities and submitted 8.13 Outline Employment and Skills Plan [Revision A] into the Examination at Deadline 5. This document is intended to 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.</p> <p>The commitment to implementing the project in accordance with the Employment and Skills Plan will be secured by way of a DCO Requirement in an update to 3.1 Draft DCO (Revision D) [REP4-037].</p>	SNDC note that a Skills and Employment plan was requested and has been provided.	Under Discussion
3.10.14	DCO Requirements – Applications made under requirements	<p>The principle of deemed discharge provisions in relation to the discharge of Requirements is not unique to this Project. The principle has precedent in The National Grid (Bramford to Twinstead Reinforcement) Order 2024. It is essential 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. The deemed discharge provision in Schedule 4 paragraph 1(2) of 3.1 Draft DCO (Revision D) [REP4-037] is subject to the caveat in sub-paragraph (3), which ensures that if the application is accompanied by a report that considers it likely that the subject matter of</p>	<p>The Council objects to the inclusion of Schedule 4, Requirement 1(2) within the draft DCO, which introduces a mechanism to allow certain requirements to be treated as approved if the relevant authority does not respond within a specified timeframe.</p> <p>The originally proposed 28-day period for discharge is, in the Council's view, unrealistic and unworkable. This is a major issue for the council. Faced with that unrealistic timeframe, the Council may be put in a position where it has no option but to refuse an application for discharge. The Council requires a minimum of 8 weeks/56 days to discharge requirements.</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>the application is to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement, then the application is deemed to have been refused by the relevant authority at the end of that period. The draft DCO does not include any Requirements directly relating to highway safety. Instead, highways matters are to be governed by the protective provisions in Part 4 and Part 5 of Schedule 16 to the draft DCO.</p> <p>The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and 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 the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays.</p> <p>The Applicant considers that this revised decision period to be adequate, 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.</p>	<p>Noting the change from 28 days to 25 business days proposed by the Applicant, this is still considered to be wholly inadequate, is unjustified when judged against statutory norms in this and other contexts (8–16 weeks) and is particularly inadequate given the need for consultation with prescribed bodies.</p>	

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be 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.</p> <p>Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the 3.1 Draft DCO (Revision D) [REP4-037] to extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question.</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>		
3.10.15	DCO Requirements – Further information	<p>A standalone consultation or initial review period of 21 days would have a considerable impact on the time it takes relevant authorities along the entire length of the route to discharge Requirements and could frustrate the delivery of the Project.</p>	<p>As to the periods of consultation: Prescribed consultees typically require 21 days for initial consultation with further consultation often necessary. Complex applications often necessitate further consultation, particularly where specialist input is required (e.g.</p>	Not Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>The Applicant has updated 3.1 Draft DCO (Revision D) [REP4-037] to replace the five-day period for the request of further information to five 'business days' for consistency of terminology. This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21-day period for notification of further information requested by a requirement consultee with an equivalent period of 15 'business days'.</p> <p>Paragraph 2(4) of Schedule 4 to 3.1 Draft DCO (Revision D) [REP4-037] allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary.</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>	<p>environmental health, ecology, heritage). A five-day window in Schedule 4, Requirement 2, paragraphs (2) and (3) does not allow sufficient time for:</p> <ul style="list-style-type: none"> • Reviewing technical documentation. • Liaising with internal specialists. • Identifying gaps or requesting additional information. <p>The requirement should be amended to allow a minimum of 21 days for initial review, with flexibility for further consultation where necessary.</p>	
3.10.16	DCO Requirements - Fees	<p>The Applicant has updated the proposed fee to align with the current national guidance in 3.1 Draft DCO (Revision D) [REP4-037].</p> <p>The Applicant proposes this matter is moved to Agreed.</p>	<p>The proposed fixed fee of £145 is outdated. As of April 2025, the national fee for discharge of conditions is £298. Fees should align with the national fee schedule and refund provisions should reflect national practice.</p>	Agreed

Other matters as required

3.11 Other Matters

Appendix A.

Draft DCO Wording

Appendix A

Draft DCO Wording

Table A.1 South Norfolk District Council – Comments on the draft DCO

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
1	DCO Wording – Change in government structure	<p>The Applicant has updated its definition of “relevant planning authority” to future proof the drafting in 3.1 Draft Development Consent Order (Revision C).</p> <p>Where local government reorganisation results in more than one successor authority across a current given area, the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is optimally structured from a statutory drafting perspective to address this. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case.</p> <p>The reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of</p>	<p>Future Governance Changes: Norfolk (and Suffolk and Essex) is part of the accelerated Local Government Review, meaning the current two-tier system will likely be replaced by unitary authorities before requirements are discharged. Wording must be future-proofed.</p> <p>SNDC query the terminology ‘relevant county planning authority’ with reference to the Relevant Representations, Local Impact Report, and ExQ1 Response.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary.</p> <p>There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.</p>		
2	DCO Wording – Discharging Authority	The Applicant has updated its definition of “relevant planning authority” in 3.1 Draft Development Consent Order (Revision C).	Discharge Authority: The Council recommends that the Local Planning Authority be designated as the discharge authority for all planning-related matters.	Under Discussion
3	DCO Wording – Consistency of terminology	The Applicant has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of ‘days’ and ‘business days’ and (with the exception of	Inconsistent use of ‘days’ and ‘business days’ for timescales creates confusion; suggest that terminology is standardised.	Agreed

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has provided business day equivalent periods for the timeframes used in the 3.1 Draft Development Consent Order (Revision C).</p>		
4	DCO Wording - Limits of Deviation	<p>While the Limits of Deviation provide some flexibility in design for the detailed design stage, the Project commitments to avoid key features apply (including ancient woodland and veteran trees) and will act as constraints to the detailed design phase, commitments are outlined within 7.2 Outline Code of Construction Practice [APP-300] and 7.4 Outline Landscape and Ecological Management Plan [AS-046].</p> <p>7.4 Outline Landscape and Ecological Management Plan [AS-046] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is secured by commitment GG14 in 7.2 Outline Code of Construction Practice [APP-300]. This relates to all trees and includes the veteran tree in proximity to Pylon 33. In addition, 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] contains information on individual veteran trees.</p> <p>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-</p>	<p>The limits of deviation (LOD) should be drafted to avoid impacts on veteran trees and A3 woodland and must avoid the area.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>323] includes information on individual veteran trees. Currently the area of woodland within the Tas Valley is not classified as ancient woodland on the Natural England Ancient Woodland Inventory (AWI). Habitat surveys of this woodland did not identify the woodland ground flora as indicating the presence of ancient woodland and therefore is not considered irreplaceable habitat in line with guidance.</p> <p>Given the controls noted above, the Applicant does not consider it necessary to amend the drafting of Article 5 of 3.1 Draft Development Consent Order [APP-056].</p>		
5	DCO Wording – Limits of Deviation	<p>The limits of deviation in Article 5 of the draft DCO (3.1 Draft Development Consent Order [APP-056]) are subject to the commitments contained in 7.4 Outline Landscape and Ecological Management Plan [AS-046] and 7.2 Code of Construction Practice [APP-300]. The Applicant does not consider it necessary to amend the wording of Article 5 of the draft DCO.</p>	<p>The Council has concerns about the current scope of Article 5 where it enables deviations that would result in the loss of irreplaceable habitats. These impacts are contrary to national policy and cannot be adequately mitigated. Robust restrictions and requirements must be included in the DCO to protect these sensitive ecological assets.</p>	Under Discussion
6	DCO Wording – Precision of language	<p>The Applicant agrees with the authority that it is important for 3.1 Draft Development Consent Order [APP-056] to be clear, robust and practical to enable the efficient delivery of the Project. The Project will be delivered by the Great Grid Partnership (GGP) – a new delivery mechanism for National Grid's Accelerated Strategic Transmission Investment (ASTI) projects, established to support the timely and coordinated delivery of nationally important electricity transmission infrastructure. Under this model, the</p>	<p>It is critical to recognise that the National Grid team responsible for pre- application and examination will not manage post-consent implementation. Instead, a separate team will rely entirely on the wording of the DCO consent. Contractors appointed post-consent often seek changes to agreed management plans (e.g. working hours) due to unforeseen issues or programme constraints. This underscores the need for clear, robust and practical drafting at the</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>team responsible for taking the Project through detailed design and construction, including the principal works contractors, has already been appointed. This team has had the opportunity to review the Development Consent Order (DCO) application and associated environmental and technical documentation in full prior to submission, ensuring that the Project is well understood by those who will be responsible for its delivery. This approach reflects the scale, urgency and strategic importance of ASTI projects and is intended to ensure that the Project can move efficiently into construction as soon as development consent is granted, without the delay that can arise from post-consent procurement or contractor familiarisation. The GGP model also supports a consistent approach to delivery, drawing on shared experience, common standards and best practice across the ASTI portfolio. This consistency helps to:</p> <ul style="list-style-type: none"> • Drive quality in design, construction and environmental management • Ensure alignment with the assumptions and commitments set out in the DCO and Environmental Statement • Reduce delivery risk through early contractor involvement and integrated team working. <p>Overall, the GGP approach provides a robust framework for delivering ASTI projects at pace, while maintaining high standards of safety, quality and environmental performance, and reflects the urgent national need to strengthen</p>	outset.	

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
7	DCO Wording - Statutory Nuisance	<p>the electricity transmission network.</p> <p>The Main Works Contractor(s) are committed to undertaking detailed construction noise and vibration assessments by commitment NV05 within 7.2 Outline Code of Construction Practice [APP-300]. These assessments will be based on the specific proposed construction methodologies for each works activity and location. Specific mitigation measures will be determined by the Main Works Contractor(s) based on the outcome of these assessments. The mitigation measures identified will be detailed in the Noise and Vibration Management (NVMP), which will be updated from the outline NVMP (7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP4-170]).</p> <p>The Main Works Contractor(s) is committed to employing best practicable means (BPM) by commitment NV01 within 7.2 Outline Code of Construction Practice [APP-300] (Outline CoCP).</p> <p>The Outline CoCP and outline NVMP (or subsequent CoCP and NVMP) do not themselves grant immunity; rather, they secure the requirement that BPM must be applied and documented, which is the legal basis for any immunity.</p> <p>Additionally, some aspects of construction noise and vibration may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, through</p>	<p>3.1.14 The inclusion of a provision granting immunity from prosecution requires careful consideration. If such a provision were to be included, it should be strictly limited to circumstances where the undertaker has demonstrably taken all reasonable measures to prevent noise and vibration nuisance.</p> <p>3.1.15 The Council's position remains that immunity from prosecution should not be incorporated within the DCO. The existing legislative framework under COPA already affords a statutory defence where National Grid can demonstrate the use of Best Practicable Means (BPM). Where works are undertaken pursuant to a Section 61 consent, noise levels and durations can be conditioned and any breach of those conditions remain enforceable. In such cases, BPM again constitutes a valid defence against prosecution.</p>	Under Discussion

ID	Matter	National Grid's Position	South Norfolk District Council's Position	Status
		<p>consultation between the Main Works Contractor(s) and the Local Planning Authority, as detailed in the Noise and Vibration Management Plan (7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP4-170]). This same principle has been proposed on other recent National Grid projects, including Bramford to Twinstead and Sea Link.</p> <p>Further, this article is based on article 7 of the general model provisions, with the removal of references to section 65 of the Control of Pollution Act 1974, following its repeal, and mirrors article 45 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024.</p> <p>This provision is appropriate for inclusion to ensure that nuisance claims are considered in the context that the effects of the Project, as one of Critical National Priority that is needed to facilitate Clean Power 2030, if the Order is made, will have been found to be acceptable on the terms of the Order and its Requirements.</p>		

4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of South Norfolk District Council:

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Date:

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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
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
SNDC	South Norfolk District Council
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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