



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

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

Responses are due by deadline 5: Wednesday 10 June 2026

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

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

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

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

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



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

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

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

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

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



Abbreviations used:

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



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



The Examination Library

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

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

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

Index

GEN	General and cross-topic questions	6
DES	Design, parameters and other details of the proposed development	7
	AQ Air quality and emissions	8
BIO	Biodiversity, ecology and natural environment	8
CA	Compulsory acquisition, temporary possession and land rights	11
DCO	Draft Development Consent Order	11
Articles	11
Schedules	12
HE	Historic environment	16
HW	Health and wellbeing	18
LUS	Land use and soils, green infrastructure	19
LV	Landscape and visual	20



Planning Inspectorate

MW Minerals and Waste	22
NV Noise and vibration	23
PRoW Public Rights of Way	23
SS Safety and security	23
SET Socio-economics, tourism and recreation	25
TT Traffic and transport	25
WE Water environment: flood risk, hydrology and drainage.....	27

<p>GEN 2.2</p>	<p>The applicant All local authorities</p>	<p>Legal Agreements</p> <p>Further to first written question (ExQ1) GEN 1.21, the applicant provided a table (appendix E [REP3-074]) outlining the legal agreements requested to date by local authorities and setting out its comments, including on whether (or not) such an agreement would meet the relevant tests.</p> <p>All local authorities are invited to provide:</p> <ul style="list-style-type: none"> • further comments on appendix E [REP3-074], or if already done this, to signpost to the ExA where in the examination library your comments on such matters can be found. In particular, the ExA seeks comments from the local authorities on how they consider each of its requests would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010). <p>The applicant is asked to provide:</p> <ul style="list-style-type: none"> • an update to the table of the requests • a summary of any ongoing agreements with local authorities which are being progressed, with expected time periods for completion • an update to the document 'Consents and licences required under other legislation' as necessary to include such other forms of agreement • updates to SoCG with local authorities as necessary to reflect agreement or non-agreement on the need for such agreements
	<p>NCC response:</p>	<p>The local authorities are seeking:</p> <ol style="list-style-type: none"> i. Biodiversity Net Gain ii. Tree Replacement Planting Programme iii. National Landscape Duty (section 85) iv. Location-specific Compensatory Measures (including the Norfolk Locations identified below) <ol style="list-style-type: none"> a. Waveney Valley v. Abnormal Indivisible Loads <p>Norfolk County Council (NCC) note that the National Landscape Duty and AILs are not relevant to Norfolk, but these requests will together form a multi-party S106 agreement or S111 agreement, or other such hybrid agreement known as a Deed of Obligation.</p> <p>Section 122(2) of the Community Infrastructure Levy Regulations 2010 and at paragraph 58 of the National Planning Policy Framework are the relevant legal and policy tests, as below:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms • directly related to the development • fairly and reasonably related in scale and kind to the development. <p><u>Biodiversity Net Gain</u></p> <p>Concerning the BNG schedule, NCC notes that the applicant has voluntarily committed to net gain. It is necessary because paragraph 4.6.6 of the 2024 version of EN-1, in accordance with which this decision should be made, requires that energy NSIP proposals should seek opportunities to provide net gains for biodiversity. This has been proposed by the applicant in the form of a unilateral undertaking; however, the host authorities believe that this should be a multi-party agreement. The requirement to seek BNG arises because of impacts on habitats caused by the project at hand, so it is directly related. Ten percent is an established target of gain for projects of every size, including NSIPs. Because 10% is directly proportionate to habitat lost, the ask is intrinsically related fairly and reasonably in scale and kind.</p>

	<p><u>Tree Replacement Planting Programme</u></p> <p>The tree replacement planting programme has been proposed by the applicant to replace any trees removed at a 3:1 ratio. Vegetation removal and tree loss result in a policy requirement to follow the mitigation hierarchy, as identified in EN-1 (avoid, reduce, mitigate, compensate). The tree replacement planting programme represents compensatory measures as required by policy, which satisfies the necessity criterion. As this schedule relates to replacing trees lost which must be removed if the proposed development is progressed, this is directly related to the proposed development. NCC supports the 3:1 proposal as put forward by the applicant. A ratio means that the proportion of trees planted will always be directly proportional to the number of trees lost, which means the proposal is intrinsically fairly and reasonably related in scale and kind to the development.</p> <p><u>Waveney Valley Landscape Compensation</u></p> <p>The applicant should provide location-specific compensatory measures including, in Norfolk, for the Waveney Valley. The argument for the necessity of compensation for the landscape impacts of the Norwich to Tilbury project on the Waveney Valley is set out fully in NCC's relevant representation at paragraphs 4.4-4.6, 10.16-10.17 and 10.19-10.21; in NCC's local impact report at paragraphs 11.24-11.32; and in SCC's LIR at Annex B.</p> <p>In summary, there is a clear policy imperative to provide compensatory measures. This arises from the general application of the mitigation hierarchy in EN-1, but also from the more specific context of landscape impacts on the Waveney Valley.</p> <p>The starting point, in policy terms, is that the mitigation hierarchy applies in relation to adverse impacts affecting the environment or biodiversity. This requires both the applicant and decision-maker to consider any measures to avoid, reduce, mitigate or compensate for such adverse impacts – see EN-1 paragraphs 4.1.5, 4.2.23, 4.2.24, 4.2.25, 4.3.4; and EN-5 paragraphs 2.1.1, 2.1.6, in particular:</p> <ul style="list-style-type: none"> • Paragraph 4.2.24 of EN-1 states in terms that “<i>Applicants must apply the mitigation hierarchy and <u>demonstrate that it has been applied</u></i>” (emphasis added); and this is echoed at paragraph 2.1.6 of EN-5. • Paragraph 4.2.25 of EN-1 further clarifies that “<i>applicants should set out how residual impacts will be compensated for <u>as far as possible</u></i>” (emphasis added). • The mitigation hierarchy is further emphasised in the context of environmental effects (paragraph 4.3.4 of EN-1). <p>While there is clearly a general duty to apply the mitigation hierarchy, the councils acknowledge that how it is applied in each case (including in terms of compensation and the extent of it) will naturally vary. In the specific instance of the Waveney Valley, the question of appropriate and proportionate compensation must be understood against the following factors:</p> <ul style="list-style-type: none"> • First, this was a case in which undergrounding was specifically considered for a section of the Waveney Valley. As per paragraph 2.9.24 of EN-5, the Applicant plainly recognised the “high potential for widespread and significant adverse landscape and/or visual impacts” along the Waveney Valley. • Second, it is common ground that (such undergrounding not being pursued) there are significant residual effects in landscape and visual terms. <p>The specific mechanism of a planning obligation (rather than a requirement) is necessary because it is not possible to provide sufficient mitigation or compensatory measures within the footprint of the development itself. Only a compensatory planning obligation is capable of meeting the policy imperative.</p> <p>If the project did not provide landscape compensatory measures for the Waveney Valley, notwithstanding the significant residual adverse effects, it would be contrary to policy. It is therefore clear that landscape compensatory measures are necessary to make the development acceptable in planning terms.</p> <p>The measures are proposed to be a contribution to interventions aimed at restoring the Waveney Valley at a landscape scale. The harm caused by the development in the Waveney Valley are significant residual effects in landscape and visual terms. The directness of the relationship is readily apparent. Interventions aimed at improving the very landscape that is harmed by the development are clearly directly related both causally and spatially to the development.</p> <p>The effects of overhead line infrastructure crossing the Waveney Valley will result in a significant adverse impact on the quality and value of the landscape character, visual and recreational amenity of the landscape, local heritage (such as the Grade I Listed St Remigius Church), and the Public Rights of Way (such as the Angles Way) in this location. The detrimental impact on the attractiveness of the area will thereby further result in socio-economic effects.</p> <p>There is no formulaic relationship between the capital cost of the development and the appropriate amount of landscape compensation, but it can be helpful to set out the context in coming to a judgement as to whether a given figure is proportionate. According to the funding statement [APP-063], the estimated capital cost of the development is approximately £895m at a 2020/21 cost base. The amount of funding requested is enough to make a tangible difference to the Waveney Valley landscape, as demonstrated by the example WaLOR and LOHP package, but it is not excessive or disproportionate</p>
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		<p>within the context of the development, representing only approximately 0.2% of the total development cost. To provide further illustration, a fund of £5m would represent approximately 5.6% of the total development cost.</p> <p>The WVA, as described in paragraphs 5.4.47 to 5.4.58 of the 2024 Design Development Report, would have been an underground cable covering approximately 2km. Table D.2 of the 2023 Strategic Options Backcheck and Review provides a figure for the cost of a 2 circuit AC underground cable capable of carrying 6930MW of £39.89m per km. Roughly, without accounting for the cost of cable sealing end compounds, the WVA would have cost in the region of £79.78m if taken forward. The figure for the actual proposal, using the equivalent figures in Table D.2, would be £3.98m per km of overhead line or £7.96m in total, meaning that the saving to the development from the withdrawal of the WVA is in the region of £71.82m. The councils do not say that the withdrawal of the WVA results in a need to contribute a comparable figure in the form of compensation for the widespread and significant adverse landscape effects caused by the overhead line in the Waveney Valley. However, it is useful for the decision-maker to be aware of the cost of undergrounding against the cost of compensation measures, to inform their consideration of whether the proposed planning obligation is fairly and reasonably related in scale and kind. A £1.7m fund would represent around 2.4% of the value of the savings, while a £5m fund would represent around 7% of the savings. A wide range of figures could be considered fairly and reasonably related from this context, so it is important to consider the scale of the impacts which are being compensated for and the sensitivity of the landscape which is affected.</p> <p>Chapter 13 of the Environmental Statement (ES) indicates, and the councils agree, that the impact of the development will be major and significant (adverse) within 0.5km of the development reducing to moderate and significant (adverse) between 0.5km and 1.5km of the development for the Waveney Tributary Farmland and the Waveney Rural River Valley landscape character areas in Norfolk (see p. 43 of [APP-226]). On the Suffolk side of the Waveney, the ES assessment is that there is a moderate-major and significant (adverse) impact on the Wooded Valley Meadowlands Fens landscape character type within 0.5km and a moderate and significant (adverse) impact on the Rolling Valley Farmlands and Furze landscape character type. A map of these LCAs and LCTs is given in ES Figure 13.6.</p>
<p>GEN 2.4</p>	<p>The applicant All local authorities All IPs listed within the Report on interrelationship with other infrastructure projects</p>	<p>Report on interrelationship with other infrastructure projects</p> <p>The ExA notes that the latest cut-off date for other existing and approved developments in the cumulative assessment is currently 31 January 2026 (Environmental Statement (ES) Chapter 17 - Cumulative Effects - Response Update [REP4-163], see also question GEN 2.5 below). However, the final version of the interrelationship report [REP4-296] should include, as far as possible, the most up-to-date position relating to the progress of other approved and pending development proposals in a summary 'at a glance' document.</p> <p>The applicant is asked to:</p> <ul style="list-style-type: none"> • ensure its final interrelationship report to be submitted at deadline 7 is consistent with ES chapter 17 and [REP4-163] • include an indication of the location of Tasway Energy Park (DCO 17) in table 2.1 of the next version of the report (the ExA notes that this proposal is not included in the plans due to the infancy of its design development) and, if available, an indication of its submission date to the Planning Inspectorate. <p>All local authorities, and IPs who are listed in the interrelationship report, are asked to:</p> <ul style="list-style-type: none"> • Review the interrelationship report [REP4-296] and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish.
	<p>NCC response:</p>	<p>The interrelationship report is, to the best of our knowledge, accurate.</p>

DES 2.5	The applicant All local authorities	<p>Approach to scenarios</p> <p>The ExA notes the updates to the progress of a number of alternative design scenarios as noted in [REP4-310], and that a number of revised plans and documents are expected to be submitted at deadline 5, however it remains unclear when a number of the other alternative scenarios are likely to be confirmed for a number of reasons, including the progress of third party planning applications.</p> <ul style="list-style-type: none"> The applicant is asked to ensure that by deadline 7 those outstanding alternative scenarios which remain are fully reasoned and timescales given wherever possible for such matters to be resolved. The local authorities are asked to review the Approach to Scenarios document [REP4-310], clarify their understanding of the scenarios which are reliant on third party planning applications, and to make other comments on the document where relevant to their area.
	NCC response:	NCC have no comments to make.
BIO 2.1	The applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	<p>Assessment of biodiversity deficit</p> <p>In response to ExQ1 BIO 1.4 the applicant has stated that replacement planting and habitat creation is identified as embedded/ standard mitigation within the outline Landscape and Ecological Management Plan (outline LEMP). The applicant considers that with this in place there would be no 'biodiversity deficit'.</p> <p>To applicant: However, the ExA notes that as indicated in image 4.1 of ES Chapter 4 [APP-130] the overall construction programme, for example, for the Dedham Vale National Landscape the enabling works through to the initial energisation would take almost 4 years. Using this as an example and noting that up to a 120 metre (m) swathe of vegetation would need to be removed for the proposed underground cabling (and with a further 50m either side being "potentially affected") set out the worst-case scenario in time period from vegetation being removed to when you consider the replanted vegetation would reach a similar degree of maturity. Also, the applicant is requested to further explain its statement in response to BIO 1.4 that ES Chapter 8 [AS026] has taken into account any short term temporary effects on ecological receptors – explain this with worked through examples, such as for hedgerow species and also for bats, to demonstrate how impacts on biodiversity have been assessed for this intervening period.</p> <p>To all local authorities and Wildlife Trusts: Set out your views on the potential for there to be biodiversity deficit and whether you consider this has been properly assessed in ES Chapter 8 and mitigated for by the applicant. Explain any outstanding concerns and what (if any) additional measures you would wish to see the applicant implement.</p>
	NCC response:	NCC have no concerns.
BIO 2.8	All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	<p>Monitoring the effects on birds</p> <p>In response to ExQ1 BIO 1.13 regarding the use of bird diverters the applicant in [REP3-074] states that ES Chapter 8 [AS-026] and the Habitat Regulations Assessment (HRA) Report [APP-082] predict no significant adverse effects on birds during operation of the proposed development either with or without mitigation and therefore additional monitoring or adaptive management is not considered necessary or proportionate. Do you agree with the</p>

		applicant's comments in this regard, if not then please explain why and set out what additional monitoring and (if necessary) adaptive management you would wish to see secured.
	NCC response:	NCC agree with the applicant.
DCO 2.G2	All local authorities	DCO General 2 In light of the applicant's response to ExQ1 [REP3-074] , question SET 1.5, and the Secretary of State's decision letter for The North Falls Offshore Wind Farm Project dated 14 May 2026, especially paragraphs 4.192 to 4.194 (inclusive), do you have any further comment in regard to the use of the term "where practicable" or any variant of that term.
	NCC response:	In line with the North Falls Offshore Wind Farm Project decision letter, it would be helpful for the applicant to confirm whether actions to be undertaken "where practicable" (or any such equivalent) have been factored into the worst-case scenario assessments within the ES and HRA. In particular, it would be useful to understand if the failure to take such action(s) (because it were not considered practicable) would have any impact on the conclusions of the environmental assessments.
Schedules		
DCO 2.S3	The applicant All local authorities	Schedules 3, Requirement 4 (Construction Management Plans) 1 Complaints procedure under the Outline CoCP secured by Requirement 4 Thurrock Council in its deadline 4 submission [REP4-339] , as well as a number of other County/ Local Authorities raises concerns in regard to the complaints management process. It considers the current complaints management process, as detailed in the updated outline CoCP [REP3-025] to be "...too basic." It highlights that although it includes contact details and requires complaints to be logged, it is lacking in significant areas. These include, but are not limited to defined response times; defined escalation procedures, requirements related to ongoing communication with complainants; identifying persons/parties with clear responsibility for resolving issues; and transparency through shared recording with the local authorities. The ExA requests: i) the applicant addresses these concerns raised and updates the complaints management process by incorporating them into a revised/updated complaints management process. The local authorities are to provide draft wording for a complaints management process it/they would be satisfied with.
	NCC response:	NCC have no comments to make.

DCO 2.S6	The applicant All local authorities	Schedules 3, Requirement 4 (Construction Management Plan) 4 Noise and Vibration Thurrock Council in its deadline 4 submission [REP4-347], along with other County/ Local Authorities, raises concerns in regard to the applicant's approach to noise and vibration monitoring, alleging it is not sufficiently developed and there is no clear or structured strategy for dealing with such matters. The Council highlights: there is no commitment to routine monitoring: no use of simple baseline checks like listening tests; no clear triggers for more detailed monitoring; and no defined thresholds for action or reporting requirements. The ExA requests the applicant to address these concerns raised and updates the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure. Local authorities are asked to collaborate and provide and agreed draft wording for the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure.
	NCC response:	The County Council defers to the District Council for Noise and Vibration matters.
DCO 2.S10	The applicant All local authorities	Schedules 3, Requirement 7 (Construction Hours) The local authorities are maintaining their concerns in regard to this requirement, especially in terms of the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, Sundays and bank holidays, together with additional start-up and close-down activities outside these hours. The ExA notes the applicant's extensive response to ExQ1 [REP3-074] at question DCO 1.S10, especially at pages 210 and 211, where it states in relation to just removing Sundays or bank holidays/ other public holidays "Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely unchanged." The ExA has noted all the justifications put forward by the applicant, as well as the applicant's final sentence in this question where it states "...removal of Sundays and/or bank holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the project." The applicant is asked to model the scenarios of removing: a) just Sundays b) just bank and other public holidays c) Sundays and bank and other public holidays and then confirm whether the energisation date on the baseline construction programme would remain largely unchanged in relation to each of those scenarios. s The ExA asks the local authorities to collaborate and provide a single form of wording for this requirement that they consider to be a reasonable compromise that collectively satisfies the concerns being raised in regard to this requirement, so this can assist in informing a discussion at ISH3 into the draft DCO. The wording submitted should include, but not be limited to, the core construction hours specified, start and close down activities and the operations that may take place outside of those core working hours.
	NCC response:	Construction activity should be limited to Saturday mornings only (07:00–12:00), with no working on Sundays or Bank Holidays. This has been the case for all NSIPs in Norfolk so far, including the Norfolk Vanguard and Norfolk Boreas DCOs.

DCO 2.S11	All local authorities	<p>Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows)</p> <p>The ExA asked in ExQ1 DCO 1.S12 [PD-014] why arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas are not clearly defined and being secured prior to construction as part of this requirement.</p> <p>The applicant responded [REP3-074] “...The submission of an Arboricultural Method Statement is secured through the outline LEMP and requirement 4 of the draft DCO. The outline LEMP states ‘All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement to be produced following detailed design and agreed with the relevant Local Planning Authorities prior to construction activity commencing. The Arboricultural Method Statement will include protection measures including tree protection fencing, as discussed in Section 7.3. and illustrated in a Tree Protection Plan’. Therefore, whilst the Arboricultural Method Statement is not secured through requirement 8, it is secured through requirement 4 and full details will be provided within the final LEMP(s) prior to the stage of works commencing.”.</p> <p>The ExA seeks comments from the local authorities on the applicant’s reply or, if you have already responded to this matter, signpost where you have provided a response on this matter.</p>
	NCC response:	<p>Details of root protection areas, tree protective fencing and other measures to be outlined within an arboricultural method statement are required to determine the level of impact. Without this information it is not possible to ascertain if impact is acceptable, if design alternatives are required or if mitigation is necessary. This is particularly important with regard to trees adjacent to the highway or PROW which have a high landscape value.</p> <p>The full impact of the development on trees and woodlands needs to be quantified prior to finalising the LEMP. The AMS will outline measures to avoid harm to trees suitable for retention. This will quantify the impact to trees, especially in the ‘affected managed’ and ‘potentially affected’ categories.</p>
DCO 2.S12	All local authorities The applicant	<p>Schedule 3 – Requirements 13 (Decommissioning)</p> <p>Braintree DC, in its response to ISH2 Action Points [REP4-323], considers the DCO should include ‘...a clear obligation on the undertaker... to remove any equipment or infrastructure that becomes obsolete, in order to avoid unnecessary long-term impacts on landscape, heritage and residential amenity.’</p> <p>The ExA would seek clarification from Braintree DC or any local authority:</p> <p>i) how the relevant planning authority would determine equipment/ infrastructure has become obsolete; ii) whether the removal of such equipment/ infrastructure should be within a specified/ fixed period of time from it becoming obsolete, for example 6 months; and iii) whether some form of control over the decommissioning of such obsolete equipment/ infrastructure, such as a written scheme of decommissioning to be submitted to the relevant planning authority for its approval, should be included within the requirement.</p> <p>The ExA also asks the applicant to comment on this matter.</p>
	NCC response:	NCC have no comments to make.

DCO 2.S13	All local authorities	<p>Schedule 4 – (Discharge of Requirements)</p> <p>Schedule 4(3) - Fees</p> <p>The ExA notes the applicant's responses to ExQ1 [REP3-074], question DCO1.S20 related to fees and asks the local authorities if they wish to raise anything in regard to this matter, especially:</p> <ul style="list-style-type: none"> a) paragraph 3(1)(a) of Schedule 4 (discharge of requirements) to the Draft DCO already providing for the application fee for the discharge of conditions to be such fee as is prescribed under the relevant regulations and the drafting in paragraph 3(1)(b) providing for an alternative figure or arrangement that would apply in the absence of there being a prescribed fee b) the term "per request" having the same meaning as in the Town and Country Planning regime, meaning that the fee would be per application for consent (i.e. more than one consent could be sought in one application) and not for each individual discharge of requirement or consent contained in an application for approval. <p>It is noted the applicant has used the term 'per request', which as far as the ExA can see is not used in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. The term 'Each Request' is used. The ExA invites all local authorities to comment on this should they wish.</p>
	NCC response:	NCC have no comments to make.
HE 2.13	All local authorities	<p>Updated version of the outline AMS/ outline WSI</p> <p>The ExA is aware that, as referenced by the applicant in [REP4-298] an updated version of the outline AMS/ outline WSI [APP-328] is due to be submitted at deadline 5. However, the applicant has indicated that this updated document would be shared with the local authorities for review at deadline 4. Please provide any initial views (and without prejudice to any formal comments you may wish to make on the submitted version at deadline 6) on the updated version of the outline AMS/ outline WSI that you might have.</p>
	NCC response:	There have been many drafts of the AMS/OSWI. NCC have provided comments on the applicant, which have been taken up. Suffolk CC, Essex CC and Historic England have been taking the lead due to specific impacts on specific parts of the scheme in their areas. There is confidence from all parties that a final version of the AMS/OSWI can be agreed.
LUS 2.4	The applicant All local authorities	<p>Green Belt - 3</p> <p>With reference to paragraph 5.11.38 of NPS-EN1 can the applicant and local authorities identify any Local Green Spaces that have been designated in Local Plans that would enjoy the same protection as Green Belt through which the proposed development would pass, and confirm whether these areas should be given the same protection as green belt in the consideration of this application. If not please explain your reasoning.</p>
	NCC response:	NCC defers to the district council on this matter.

LV 2.16	All local authorities	<p>Mitigation and compensation - 1</p> <p>Point 8.2e [REP4-302] states that the applicant considers it has provided sufficient mitigation and that the residual impacts are vastly and substantially outweighed by the public benefits of the proposed development, and that consequently further compensation for landscape and visual effects would be disproportionate.</p> <p>The local authorities, particularly Suffolk County Council, are asked to provide views on this statement, referring to the Bramford to Twinstead examination report where relevant.</p> <p>Any other IP may also respond if they wish.</p>
	NCC response:	NCC strongly disagrees with the applicant about the requirement for additional compensation and takes issue with the applicant's characterisation of our position. Contrary to the applicant's written summary of oral submissions to ISH2, it is not the case that Norfolk County Council considers that <u>all</u> residual impacts after mitigation should be fully compensated. As highlighted in our own post-hearing submission [REP4-332] , there is a need for "additional compensation and landscape led restoration projects <u>within the Waveney Valley</u> " [emphasis added]. Paragraph 4.2.25. Norfolk County Council's position is also entirely consistent with the Bramford to Twinstead examination report. NCC is not asking for "automatic" compensation but instead seeking compensation based on a proper understanding of the policy position and factual context that arises in the Waveney Valley.
MW 2.1	Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	<p>Contaminated Ground</p> <p>Please confirm if you accept the applicant's assessment of contaminated ground risk as detailed in ES Chapter 9 [APP-181] and provide any comments, if applicable, on commitment GH10 in the outline CoCP [REP4-163].</p>
	NCC response:	NCC have no comments to make.
MW 2.2	The applicant Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	<p>Quarries and Minerals Plan Candidate Sites</p> <p>Please provide an update from ExQ1 on consideration of design and land use considerations in the vicinity of existing quarries and candidate sites.</p>
	NCC response:	The Norfolk Minerals and Waste Local Plan (NM&WLP) was adopted in May 2025 and replaced the Norfolk Minerals and Waste Core Strategy and the Mineral Specific Site Allocations DPD and Waste Specific Site Allocations DPD. The NM&WLP does not contain any specific site allocations within the Project Order Limits, and while there is one existing mineral site within the project limits at Mangreen, this site has completed extraction and it is not considered that the proposed development would impact on the mineral site.

TT 2.2	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	PARs 2 Please highlight any residual concerns you may have regarding specific PARs which you believe have not been adequately addressed by the applicant and where you may have concerns about ability to address them either during or after the examination.
	NCC response:	NCC and the developer still have outstanding issues relating to HGV traffic in Diss, specifically concerning PARs 8 and 9. Following discussions with the applicant's transport consultants, an updated Diss Strategy is expected to be submitted ahead of Deadline 5.
TT 2.4	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Outline CTMP 2 Following ISH2, at DL4 the applicant updated the outline CTMP [REP4-174] with regard to community engagement with councils, parish councils, other developers and the public. Please provide comments on this updated proposal.
	NCC response:	One aspect that has not changed is the proposed working hours on Saturdays, Sundays, and Bank Holidays. If the developer is seeking to improve community engagement, construction activity should be limited to Saturday mornings only (07:00–12:00), with no working on Sundays or Bank Holidays. This has been the case for all NSIPs in Norfolk so far. It would be helpful to understand whether the project will appoint a Community Liaison Officer (CLO) for each County or a single CLO for the entire project. From our experience on other NSIPs, having a dedicated CLO has proven highly beneficial in maintaining strong relationships between all parties and ensuring communities feel properly engaged and represented, particularly at the parish level.
TT 2.9	The applicant National Highways Essex County Council Thurrock Council Norfolk County Council	Outline CTMP 6 In their response action points at ISH2 [REP4-336] at paragraph 11.5.d, Suffolk CC propose a quarterly report on the key transport parameters, some of which they go on to list. Does the applicant consider this appropriate and how would this be secured in the DCO. Please can the other highway authorities comment on this proposal.
	NCC response:	NCC are happy for quarterly reporting to be set as the minimum requirement. However, there should be provision for flexibility, allowing NCC to request more frequent updates where necessary, for example, in circumstances where the developer or contractor anticipates potential peaks in HGV movements that may approach or exceed the DCO traffic thresholds.
TT 2.10	National Highways Essex County Council Thurrock Council Suffolk County Council	Cap on Heavy Goods Vehicles (HGVs) Please can all highway authorities who have not done so already, provide comments on whether you consider a cap on HGVs is required or if the applicant's proposals to provide a three month forward view is acceptable. If you have commented previously, please signpost the ExA to your latest position on this matter.

	Norfolk County Council	
	NCC response:	NCC have not made any comments but are happy with this approach. As per our comments on TT 2.9, the three-month window could be monthly or even weekly.
TT 2.12	The applicant National Highways Essex County Council Thurrock Council Norfolk County Council	Abnormal Indivisible Loads (AIL) 1 Thank you for the updates on structural assessments for AIL routes provided at deadline 4. For clarification, please explain the expectation for undertaking the remaining structural assessments on AIL routes and outline what measures will be taken, and how they are secured in the draft DCO, if structural assessments fail.
	NCC response:	There are no AILs due in Norfolk

WE 2.1	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Drainage Strategy Please provide comments on the updated drainage strategy submitted at deadline 4 [REP4-186] .
	NCC response:	The LLFA has provided a separate written response that reviews each of our previous comments against the updated Drainage Strategy.
WE 2.2	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Progress with agreement of issues The applicant states that it is confident that drainage issues can be resolved by close of the examination, please explain if you consider this an accurate reflection of progress and if there are specific matters you consider are at risk of not being agreed by the close of the examination.
	NCC response:	It is not clear to the LLFA if this is possible to resolve, due to the limited amount of consultation with the LLFA by the applicant to date and the limited amendments made so far to the drainage strategy would indicate a reluctance to engage in resolving these issues.
WE 2.3	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Disapplication of section 23 of the Land Drainage Act 1991 Further to applicants reply to WE 1.9, please confirm acceptance, or otherwise, to the disapplication of section 23 of the Land Drainage Act 1991 and provide an update on your consideration of the applicants proposed protective provisions in this regard.
	NCC response:	Norfolk LLFA does not accept the disapplication of Section 23 of the Land Drainage Act 1991 due to the additional requirements the applicant seeks to place on the LLFA that are not present in the Land Drainage Act 1991. The LLFA have tried to discuss this with the applicant who have been reluctant to engage in a constructive manner.