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Norwich to Tilbury

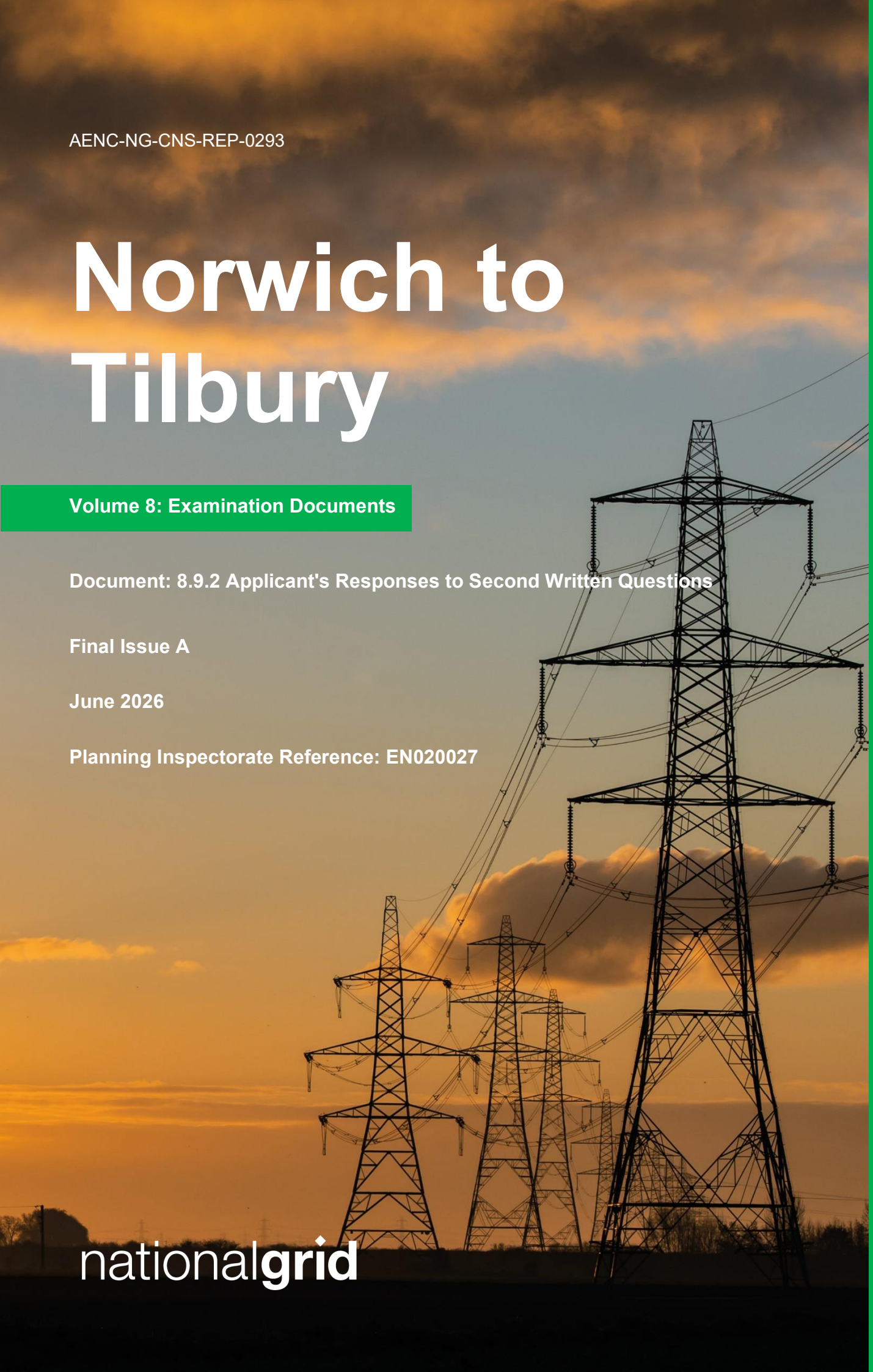
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Introduction

Document Purpose

This document provides the Applicant's responses to the **Examining Authority's Written Questions 2 [PD-023]**, published on 22 May 2026 for Norwich to Tilbury. This document contains responses to all of the questions addressed to National Grid Electricity Transmission plc (here on referred to as 'the Applicant').

The Applicant has noted the comments of the Examining Authority (ExA) in the introduction to the Written Questions about the need for comprehensive answers. The ExA also notes that it is possible that the Deadline 4 submissions may have already provided the information requested, in which case parties are requested not to re-submit information but to signpost it using the examination library reference. The Applicant has therefore provided comprehensive answers except where it can signpost where the information can be found in an existing document.

Structure of the Document

This document is structured to align with the numbering used in the **Examining Authority's Written Questions 2 [PD-023]**. For each section there is a response table, and within each table there are four columns:

- The first column provides the reference number of each question
- The second column provides the reference to the organisation each question is addressed to
- The third column provides the full wording of the question
- The final column provides the Applicant's response.

Where the question is not directed to the Applicant no response is provided.

Additional Documents

In some cases the question requires a response that requires an appendix. These appendices are at the end of the document and relate to the following questions.

- GEN 2.2 – Appendix A
  - Part a)
  - Part b)
- GEN 2.3 – Appendix B (full response)
- BIO 2.11 – Appendix C
- DCO 2.G1 – Appendix D
- LV 2.8 – Appendix E
  - E1: Cumulative Effects on Landscape Character Areas and Types

  - E2: Cumulative Effects on Visual Receptor Areas
- LV 2.10 – Appendix F
- LV 2.15 – Appendix G
- LV 2.19 – Appendix H
- TT 2.6 – Appendix I

1. General and cross-topic questions

Table 1.1 General and cross-topic questions

Reference	Question to	Question	Applicant's Response
GEN 2.1	The applicant All interested parties	Final deadlines and statements of common ground (SoCG) The scale of the proposed development and volume of documentation submitted into the examination by all parties is considerable. The applicant and all interested parties (IPs) are reminded of the four remaining deadlines in the examination timetable and are referred to the Rule 8 letter dated 17 February 2026 [PD-011] which sets out what the ExA expects to receive at each deadline. • deadline 5: 10 June (the additional deadline 5A on 17 June is limited to certain responses only) • deadline 6: 7 July • deadline 7: 21 July • deadline 8: 4 August All parties are reminded that there is no need to resubmit comments which have already been made in earlier deadlines. If an IP continues to be dissatisfied with the unchanged response from the applicant, they should set out clearly those points in	The Applicant welcomes the clarity provided by the Examining Authority in this question. The Applicant has been engaging with stakeholders to progress SoCGs, focusing on moving matters to (ideally) 'agreed' or (in other cases) 'not agreed' so it is clear to both parties and the Examining Authority what matters remain under discussion and require further engagement. Engagement will continue with the aim of final, signed documents by Deadline 7.

Reference	Question to	Question	Applicant's Response
		summary form in their final comments at deadline 7; there is no requirement to respond at every deadline unless new information has arisen which they wish to comment on. Cross-reference should be made to the examination library references where possible in all submissions. The ExA also reminds all parties of the importance of setting out matters which the parties agree on, and which they continue to disagree on. This can be set out in SoCGs or written summaries at the final deadline 8 (by 4 August 2026). The ExA expects SoCGs to be signed by both parties involved in each SoCG and urges the relevant IPs to engage in these so that their comments are accurately reflected within the documents.	
GEN 2.2	The applicant All local authorities	Legal Agreements 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. All local authorities are invited to provide: further comments on appendix E [REP3-074], or if already done this, to signpost to the ExA where in the examination library	The Applicant has addressed each of the requests from the Examining Authority in turn below. • **An update to the table of requests** The Applicant has provided an update to the table provided in Appendix E of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, provided in response to written question GEN 1.21, in **Appendix A** to this document. For clarity, an additional column has been added to the original table submitted at Deadline 3 which provides an update regarding whether a legal agreement is being progressed in relation to the requests or not. • **A summary of any ongoing agreements with local authorities which are being progressed, with expected time periods for completion**

Reference	Question to	Question	Applicant's Response
		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). The applicant is asked to provide: • 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	The Applicant has provided a table in **Appendix A** to this document to respond to this request. • **An update to the document 'Consents and licences required under other legislation' as necessary to include such other forms of agreement** The Applicant has an updated **5.5 Consents and Licences Required Under Other Legislation [Revision C]** as requested by the Examining Authority to include other forms of agreement and submitted this at Deadline 5**.** • **Updates to SoCG with local authorities as necessary to reflect agreement or non-agreement on the need for such agreements** The Applicant notes this request and is compiling the requisite information. Whilst it has not been possible to incorporate this into the SoCGs for Deadline 5, we will ensure going forwards that the SoCGs are updated in accordance with this request.
GEN 2.3	The Applicant	Cumulative Assessment – Methodology Environmental Statement (ES) Chapter 17 Cumulative Effects [APP-281] describes the methodology used to assess the significance of potential inter-project cumulative effects, with significance criteria set out in Table 17.6. ExQ1 GEN 1.26 sought justification of this assessment methodology and the	See the full Applicant's Response in **Appendix B**.

Reference	Question to	Question	Applicant's Response
		applicant replied to this [REP3-074]. However, the ExA does not consider the applicant's response to be sufficient and is seeking further clarification on the following points: a) Explain the meaning of 'significant magnification' in Table 17.6 and how it has been applied to determine levels of cumulative effects. b) Table 17.6 of ES Chapter 17 indicates that only potentially wide-ranging effects could be Major (Significant). Is it possible that localised effects could also be Major (Significant), if the receptor or resource is particularly susceptible to change or highly valued for example? If so, identify any Major (Significant) localised effects. If not, explain why. c) In your response to ExQ1 GEN1.26 you refer to compliance with the methodology provided in the Scoping Report [APP-296]. The Scoping Report at 5.1.2 explains how the significance of effect is usually derived (combining the value of the receptor with the magnitude of the impact) but states that the cumulative effects assessment does not use this approach. In the absence of this approach explain how the conclusions on whether an inter-project effect is likely to be significant or not have been reached.	

Reference	Question to	Question	Applicant's Response
		d) In your response to ExQ1 GEN1.26 you indicate that the assessment undertaken is similar to inter-project cumulative effects assessments undertaken for other linear Nationally Significant Infrastructure Projects (NSIP). Provide specific examples of where this is the case and identify any similarities or differences between the projects and the approach taken. In addition, explain how the number and scale of other nearby projects that have been or are yet to be constructed at certain sites such as the proposed East Anglia Connection Node (EACN) and Tilbury North substations compares with those for other linear projects. e) Provide a table which summarises how best practice guidance has been applied in determining cumulative effects for each environmental topic considered in ES Chapter 17.	
GEN 2.4	The applicant All local authorities All IPs listed within the Report on interrelationship with other infrastructure projects	Report on interrelationship with other infrastructure projects 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	The Applicant will ensure that the final **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** to be submitted at Deadline 7 will be consistent with any submission containing the assessment of inter-project cumulative effects. The Applicant can also confirm: • The initial version of the report provided at Deadline 1, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, was consistent with, i.e. took into account, the other projects in the Environmental Statement (ES) Chapter 17 short list provided in **6.17.A2 Environmental Statement**

Reference	Question to	Question	Applicant's Response
		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. The applicant is asked to: • 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. All local authorities, and IPs who are listed in the interrelationship report, are asked to: • 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.	**Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**. • The mid-examination update of the report provided at Deadline 4, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**, was consistent with, i.e. took into account, additional projects added to the ES Chapter 17 short list in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** both took into account planning applications submitted up to 31 January 2026. The Applicant also took account of updates to Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**, e.g. amended construction dates, in the assessment provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. • The final update of the report to be provided at Deadline 7, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, will be consistent with, i.e. will take into account, any additional projects added to the ES Chapter 17 short list as submitted to the examination at Deadline 7. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]** will take into account planning applications submitted up to the same date (see response to GEN 2.5). The Applicant will also take account of updates to Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, e.g. amended construction dates, in the assessment provided in **6.17.1 Environmental Statement**

Reference	Question to	Question	Applicant's Response
			Chapter 17 - Cumulative Effects - Response Update [Revision B]. The Applicant will provide an indication of the location of Tasway Energy Park (DCO 17) in Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]** to be submitted at Deadline 7, as requested. According to the maps in this project's Phase 1 Consultation (21 October to 5 December 2025) brochure available on the promoter's website, the communities that would surround the project include Ashwellthorpe, Tasburgh, Long Stratton, Wacton, Forncett Saint Peter, Forncett End, Tacolneston and Bunwell in South Norfolk. The Applicant notes that, as of late May 2026, there is no page for Tasway Energy Park on the Planning Inspectorate's National Infrastructure portal; such a page would indicate the planned date for the submission of the application for development consent. The Tasway Energy Park Phase 1 Consultation (21 October to 5 December 2025) brochure stated that the application for development consent had then been proposed in early 2027; however, as this brochure pre-dated the promoter's December 2025 announcement that there will be a delay to the planning process until this project has better visibility of their grid connection point, the Applicant considers the date in the brochure is no longer current. As the developer's website does not carry an updated application date, the Applicant is currently unaware of the current programme for this project. The Applicant will monitor this website and the Planning Inspectorate's National Infrastructure portal in its preparation of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision C]**, and provide the Examining Authority with an update at Deadline 7 if publicly available at that point.

Reference	Question to	Question	Applicant's Response
GEN 2.5	The applicant	Cumulative Assessment – Inter-Project Effects ES Chapter 17 - Cumulative Effects - Response Update [REP4-163] provides an update to the inter-project cumulative effects assessment including other existing and, or approved developments that have been identified since 1 April 2025 and up to and including 31 January 2026. A further update to capture other existing and, or approved developments after the 1 February 2026 is proposed for deadline 7. Confirm the cut-off date that will be used for other development considered in the deadline 7 cumulative assessment. The applicant is asked to provide a further response update at deadline 6 (or provide reasoning why this is not necessary), with the final consolidated ES including cumulative assessment (clean and tracked change versions) provided no later than deadline 7.	The Applicant confirms that the cut-off date of 8 May 2026 will be used for the Deadline 7 revision of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [Revision B]**, to allow for submission at Deadline 7. Given the scale and size of the Project and the two week timescale between Deadline 6 and Deadline 7, the Applicant does not consider that an interim update would reasonably include any meaningful assessment and therefore proposes that a further response at Deadline 6 is not provided. Nonetheless, the Applicant will keep the position under review ahead of Deadline 6.

2. Design parameters and other details of the proposed development

Table 2.1 Design, parameters and other details of the proposed development

Reference	Question to	Question	Applicant's Response
DES 2.1	The applicant	Independent Design Review - 1 The applicant's response to ExQ1 DES1.3 [REP3-074] is noted and the detail within this answer acknowledged. a) Does the North Falls and Five Estuaries Joint Substations Design Guide include or provide any design guidance for the proposed EACN? b) In practice what does 'actively engaged' in the Joint Substations Design Guide process mean? c) What differences are there between the Five Estuaries onshore substation and the proposed EACN in terms of siting and landscape sensitivities? d) It is noted that consent for North Falls has now been granted and that requirement 5 of the	**a)** The North Falls and Five Estuaries offshore wind farms Joint Substations Design Guide (JSDG) (Version 01: January 2026) sets out at paragraph 2.1.3 that the EACN does not form part of the JSDG. **b)** Although the EACN substation does not form part of JSDG the three parties have and continue to engage on matters of design. This explains what was meant when the Applicant is also 'actively engaged' in the North Falls and Five Estuaries JSDG process. Actively engaged means ongoing collaboration is happening with both North Falls and Five Estuaries through the design guide process and design guide content. **Design guide process** Starting with the active engagement between the three projects, the design guide process has included: • Cooperation and sharing of existing survey data to reduce intrusive surveys • Ongoing information sharing and liaison around interfaces to coordinate works, programming, and minimise cumulative impacts • Use of interface agreements and operating protocols to regulate interface matters including but not limited to the management of traffic flows

Reference	Question to	Question	Applicant's Response
		consent ensures that independent design review takes places for their proposed substation. What differences are there between this proposed substation and the EACN in terms of siting and landscape sensitivities?	• The sharing of draft documents ahead of submissions to the Secretary of State to enable review and alignment. This was also a practice implemented by North Falls and Five Estuaries during their Development Consent Order examination • As a cooperating partner, the Design Approach for Site Specific Infrastructure was shared with North Falls and Five Estuaries during key production stages to ensure it complemented their proposals, aligned with JDG design approaches, and avoided any conflicts with their substation developments. Similarly, the JSDG was shared with the Applicant for the same purpose • Regular bi-weekly coordination meetings to discuss cross-project matters; • Participation in Phase 1 engagement (August to September 2025) on the JSDG, identifying where coordination has already occurred and where further alignment is needed (e.g. cable routeing, drainage and planting zones) • Participation in Phase 2 engagement (February to March 2026) on the JSDG, reviewed by the Great Grid Partnership with feedback provided on key design interfaces and areas of continued co-ordination. In addition, the confirmation that all substations at Ardleigh will be of Air Insulated Switchgear (AIS) type significantly reduces the potential for variation between projects. This allows for a more consistent approach to scale, layout and design and further strengthens alignment through the JSDG. Importantly, this coordinated approach will continue through the detailed design stage. North Falls and Five Estuaries representatives will be invited to participate in the Norwich to Tilbury Design Review Panel, and designers across all three projects will continue to liaise regularly to coordinate key design matters – see **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision C]** submitted at Deadline 5.

Reference	Question to	Question	Applicant's Response
			Design guide content The active engagement in the design guide process has helped shape the content of the Joint Substation Design Guide, which includes reference to and consideration towards key design matters relating to the EACN: • The siting of the EACN and NGET infrastructure requirements • Design considerations for the secure boundary treatment • The proposed colour finish for larger substation buildings as prescribed in the DASSI • Strategic integration with the EACN site on landscape and ecological matters The JSDG recognises that the DASSI, submitted with the Norwich to Tilbury DCO application identifies Brown Grey and Olive Green as potential colours for the EACN substation buildings. The JSDG also recognises NGET have proposed a hot-dipped galvanized steel palisade fence as the secure boundary to the EACN substation. The latest version of the North Falls and Five Estuaries Joint Substations Design Guide (Version 01: January 2026) illustrates the landscape and ecology masterplan for North Falls and Five Estuaries alongside the Environmental Area proposals for the proposed new EACN substation in its figures 8.17 Landscape and Ecology Masterplan - Integration with Future Projects (page 107) and 8.19 Landscape and Ecology Masterplan - Illustrative Integration with Future Projects (page 109). The **7.16 Design Approach Site Specific Infrastructure [Revision C]** has been updated at Deadline 5 to include a commitment to have regard to the conclusions of the Joint Substation Design Guide (Version 01: January 2026). It also includes a design principle - Substation Design Co-ordination (also see response to written question DES 2.2). Taken together, the design guide process and the resultant design guide content that has regard to the EACN site demonstrates that 'active engagement' is not simply a procedural commitment but a substantive ongoing process to achieve a cohesive design outcome that in turn meets

Reference	Question to	Question	Applicant's Response
			the good design outcomes set out in the Planning Inspectorate Advice on Good Design (2024). The outcomes sought by the recent Secretary of States North Falls (EN010119) decision letter (see paragraph 4.179 (page 43)) - namely a harmonised landscape design across the co-located developments - is being achieved for the EACN through an established and continuing collaborative framework of good design co-ordination. **c)** The proposed new EACN substation site spans across several enclosed, arable fields, subdivided by shelterbelts and hedgerows with hedgerow trees. The Five Estuaries onshore substation (OnSS) is predominantly located within one, more open, arable field. The specific siting of the EACN substation was informed by consideration of the Horlock Rules and the selection of a site benefiting from the presence of some existing screening vegetation that provides greater enclosure. In response to local context and site planning the siting of the EACN has taken advantage of the screening provided by existing features (shelterbelts and hedgerows with hedgerow trees) to keep intrusion into surrounding areas to a reasonably practicable minimum. The siting of the EACN accords with paragraph 2.2.9 of NPS EN-5 (2024) where there are possibilities for screening of the infrastructure to mitigate impacts. Views into the proposed new EACN substation are largely filtered and screened by existing belts of vegetation located along surrounding field boundaries and local lanes. In comparison to this, there are open views from the immediate north (from Barn Lane Bridleway) and west (from Grange Road) and longer distance open views from the south and east, into the Five Estuaries OnSS site due to its location within a more open, larger scale arable field. The context of the Five Estuaries OnSS site is primarily more open than the EACN site and as such there is a greater emphasis on the need to incorporate landscape and visual mitigation to provide screening and integration.

Reference	Question to	Question	Applicant's Response
			The proposed new EACN substation and the Five Estuaries onshore substation (OnSS) are both sited within the same landscape character area (LCA) 7A Bromley Heaths, which falls within landscape character type (LCT) 7 Heathland Plateaux. Both are also sited near to the existing Lawford substation and are adjacent to local lanes. Both sites are oversailed by existing 132kV overhead lines that connect into Lawford substation. Bromley Heaths LCA 7A is judged to be of medium sensitivity to the Norwich to Tilbury Project, within the context of the Study Area, as reported in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Paragraph 2.1.22 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision C]** sets the immediate baseline context of the EACN substation site as follows: '*Within the Order Limits around the EACN Substation there are large arable fields, enclosed by mature shelterbelts and hedgerows with some hedgerow trees. Existing overhead lines cross the Order Limits, connecting to the existing Lawford Substation to the south*'. The Five Estuaries Landscape and Visual Impact Assessment (LVIA) (Five Estuaries DCO Application document number 6.3.2 [APP-085]) has judged the Bromley Heaths LCA 7A to be of medium-high sensitivity to the onshore substation. Paragraph 2.11.18 of the Five Estuaries LVIA sets the baseline context of the OnSS site as follows: '*In the area around the OnSS, a boundary, in terms of local landscape character can be defined, whereby the local area is characterised by arable farmland and relatively sparse rural settlement, while the wider area is characterised by built development or a mix of built and rural development.*' **d)** The proposed new EACN substation spans across several enclosed, arable fields, subdivided by shelterbelts and hedgerows with hedgerow trees. The North Falls OnSS site is predominantly located within one, more open, arable field. As explained against point **c)** above, the specific siting of the EACN was informed by consideration of the Horlock Rules and the selection of a site benefiting from the presence of some existing screening vegetation that provides greater

Reference	Question to	Question	Applicant's Response
			enclosure. In response to local context and site planning the siting of the EACN has taken advantage of the screening provided by existing features (shelterbelts and hedgerows with hedgerow trees) to keep intrusion into surrounding areas to a reasonably practicable minimum. Views into the proposed new EACN substation are largely filtered and screened by existing belts of vegetation located along surrounding field boundaries and local lanes. In comparison to this, there are open views from the south and east, and also from Grange Road in the west and Barn Lane Bridleway in the north, into the North Falls OnSS site due to its location within a more open, larger scale arable field. The context of the North Falls OnSS site is primarily more open and as such there is a greater emphasis on the need to incorporate landscape and visual mitigation to provide screening and integration. The proposed new EACN substation and the North Falls OnSS are also both sited within the same LCA 7A Bromley Heaths which falls within LCT 7 Heathland Plateaux. Both are also sited near to the existing Lawford substation and are oversailed by existing 132 kV overhead lines that connect into Lawford Substation. Much of the EACN substation site lies adjacent to local lanes and is away from public rights of way. The North Falls OnSS site is partially bound to the north by a small section of Grange Road and a bridleway that follows Barn Lane. Bromley Heaths LCA 7A is judged to be of medium sensitivity to the Norwich to Tilbury Project, within the context of the Study Area, as reported in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Paragraph 2.1.22 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision C]** sets the immediate baseline context of the EACN substation site as follows: '*Within the Order Limits around the EACN Substation there are large arable fields, enclosed by mature shelterbelts and hedgerows with some hedgerow trees. Existing overhead lines cross the Order Limits, connecting to the existing Lawford Substation to the south*'. The North Falls LVIA (document reference 6.3.2 [APP-044]) has judged the Bromley Heaths LCA 7A to be of medium sensitivity to the onshore

Reference	Question to	Question	Applicant's Response
			substation. Paragraph 48 of the North Falls LVIA sets the baseline context of the OnSS site as follows: '*The landform across the onshore substation works area is generally flat, and is approximately 35m Above Ordnance Datum (AOD). The landcover is characterised by arable farmland with a large-scale field pattern. Field boundaries are generally open in character. There are some hedgerow boundaries with occasional hedgerow trees and a higher level of tree cover along the boundary with Barn Lane and Grange Road, to the north and west and around the existing Lawford substation on Ardleigh Road, to the south-west of the onshore substation works area. It is open to farmland to the east and south. A steel-tower overhead electricity line crosses the north-western edge of the onshore substation works area*.' North Falls OnSS and Five Estuaries OnSS sites are adjacent to each other, in the more open larger scale arable fields to the east of the EACN. The openness of the North Falls OnSS and Five Estuaries OnSS sites differentiate them from the EACN site which benefits from enclosure due to existing vegetation. Given the similar siting and landscape context for North Falls and Five Estuaries both characterised by open views and limited existing screening, unlike the EACN, and in light of the Secretary of State's comments in the North Falls decision letter, dated 14 May 2026 (EN010119) on differing landscape proposals, a coordinated approach was required. The Applicant has acted as a co-operating partner in the development of the JSDG to support strategic landscape integration across the North Falls and Five Estuaries onshore substation sites and has set out in the **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision C]** that the Design Review Panel to be established by the Project will include representatives of the North Falls and Five Estuaries consents team, and seek to have regard to the conclusions of the JSDG. This approach will result in a more cohesive and holistic design that includes co-ordination of the proposed cumulative infrastructure. The Design Review for EACN will include consideration of landscape proposals for North Falls and Five Estuaries to tie together a coherent landscape scheme.

Reference	Question to	Question	Applicant's Response
DES 2.2	The applicant	Independent Design Review – 2 North Falls and Five Estuaries both have consent, and both have independent design review within the requirements of their respective DCOs for their onshore substations, yet there is no such provision proposed within the draft DCO for the proposed development, despite the obvious interlinkages and locations of the three proposed substations. Provide further evidence as to why you consider such an independent design process is not required for the EACN or amend the draft DCO accordingly.	An Air Insulated Switchgear (AIS) substation solution is proposed for the EACN that predominantly consists of outdoor electrical circulatory equipment sited in an open-air compound where design follows its functional purpose. There is limited scope of variation especially for this type of substation given the functional need for the electrical circulatory equipment to meet certain operational reliability and safety standards. This limits the extent to which deviations to the standard AIS design is possible for a meaningful independent design review to take place. We also question whether those involved within an independent design review will be qualified to advise on such technical design matters. We cannot accept design variations that interrupts energy flows and undermine National Grid's ability to meet its licence obligations. Instead to demonstrate commitment to securing good design with regards to fitness for purpose and functionality (NPS EN-1 paragraph 4.7.11), the delivery design partners have a technical assurance process where an authorised engineer reviews and accepts engineering deliverables to ensure that design meets the requirements of the scope, is technically sound and compliant with all relevant specifications. The GGP has an established design and technical assurance framework, using a risk-based approach to support the scale and pace of design produced by the GGP. Alongside this, the Design Review Panel (DRP) will provide a design review and design quality assessment overlay for key focus areas of the proposed infrastructure, and at key points in the detailed design development programme, to help National Grid continue in their obligation to meet good design outcomes (see Appendix C – **7.16 DASSI [Revision C]**). The ExA for Yorkshire GREEN (EN020024) in their recommendation report (paragraphs 3.13.5 and 3.13.52) recognised National Grid did not require independent professional design advice, but it did prepare the DASSI, which sets out the design principles to be applied (NPS EN-1 (2024), paragraph 4.7.5) and was content that the DASSI would guide detail design development for the CSECs as well as the substations. The

Reference	Question to	Question	Applicant's Response
			ExA also confirmed that the DASSI guides selection of aggregate colour to be explored to assist in reducing the overall mass of all the substations. In turn the Applicant refers to the updated **7.16 DASSI [Revision C]** that provides sufficient design content and where there is limited scope for variation such as colour finish of building/ enclosures, it explains how this would form part of a GGP design review process as part of a wider holistic approach to good design linking good design principles to other topic areas. The Applicant maintains that due to the technical electrical design considerations, there is very limited scope for an Independent Design Panel to meaningfully inform design. We have updated the **7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision C]** with a new design principle on Substation Design Co-ordination. This design principle provides assurance that key documents will remain coordinated as they are developed, reflecting the co-location of the substations and the need for aligned plans and documentation. The Applicant also proposes to establish a Design Review Panel (DRP), hosted by the Great Grid Partnership, to undertake robust design reviews. The DASSI has been updated at Chapter 6 with a design governance model that includes details of a design review process which will be adopted to secure good design. The DRP for Norwich to Tilbury will undertake design reviews post-consent, and is proposed to include the following representatives comprising of multi-disciplinary experts linking good design principles to other topic areas holistically: • Chair – Arcadis Independent Design Advisor • GGP Design Executive Technical and Design Assurance lead • Development Design Champion (DDC) • National Grid Head of Environment and Sustainability • National Grid Strategic BNG lead • National Grid Strategic landscape + placemaking lead • National Grid Community Liaison Officer.

Reference	Question to	Question	Applicant's Response
			Where relevant, the following external stakeholders will also be invited onto the panel: • Representatives of local planning authorities • Dedham Vale National Landscape Partnership Manager • Representatives of North Falls OWF and Five Estuaries OWF project teams • Representative of the local Wildlife Trust. Design review of the substations will include a nominated representative of the relevant LPAs by invitation. For the EACN substation, the DRP will also include representatives of the North Falls and Five Estuaries project teams, and will seek to have regard to the conclusions of the Joint Substations Design Guide. This approach will seek a more cohesive design that includes co-ordination of the proposed cumulative infrastructure. The Design Review for the EACN substation will also include consideration of landscape proposals for North Falls and Five Estuaries to tie together a coherent landscape scheme. The design principles in the DASSI will facilitate a holistic approach to other topic areas including links with Local Nature Recovery Strategies when final details of the Landscape and Management Plan are submitted for discharge of requirement 4 (construction management plans) of the **3.1 Draft Development Consent Order (DCO) [Revision E]**. The Applicant considers there is sufficient design content secured in the DASSI and where there is scope for variation at the detailed design stage, appropriate good design mechanisms are proposed in the updated DASSI. For the proposed EACN, this includes a multi-disciplinary design review of the interlinkages between the three proposed substations against the requirements of their respective DCOs.
DES 2.3	The applicant	Independent Design Review - 3 The processes undertaken regarding routing and siting are noted within the applicant's	The Applicant notes the wide definition of 'building' in article 2 and considers that the definition is sufficient to ensure that the requirement will result in the relevant buildings being constructed in accordance with the **7.16 DASSI [Revision C]**. It is to be noted that Requirement 12 was always intended to apply to buildings in the traditional sense of that word,

Reference	Question to	Question	Applicant's Response
		response to ExQ1 DES1.3 [REP3-074]. However, and notwithstanding the proposed transmission lines, the proposed development includes two new substations and extensions to two existing ones. Given the nature of substations, many of these such works may not constitute 'buildings', particularly those within the AIS substations or extensions and therefore may not be controlled through requirement 12 of the draft DCO [REP4-037]. Independent design review of such works would seem to help ensure that the substations are examples of good design as far as possible. Respond to this point generally and specifically for each proposed substation and extension (the answer regarding EACN may cross refer to the answer to DES 2.2).	i.e. structures with walls and roofs, and not electrical circulatory equipment and structures such as gantries and related or associated electrical equipment that must meet certain performance and safety standards that drive their form and function as recognised in the National Policy Statement (NPS) EN-1 (2024) on fitness for purpose and functionality (paragraph 4.7.1 and 4.7.11) and EN-5 (paragraph 2.4.3 and 2.4.4). In that respect the Applicant would like to draw attention to the definitions under section 64 of the Electricity Act 1989 that provide a clear distinction on what amounts to 'electrical circulatory equipment' as opposed to a 'building' in the traditional sense and meaning of that word. Together electricity plant and electric lines comprise 'electrical circulatory' equipment: • *'"electrical plant" means any plant equipment, apparatus or appliance used for, or for purposes connected with the generation, transmission [distribution] or supply of electricity, other than—* *a) an electric line;* *b) a meter used for ascertaining the quantity of electricity supplied to any premises; or* *c) an electrical appliance under the control of a consumer;* • *"electric line" means any line which is used for carrying electricity for any purpose and includes, unless the context otherwise requires—* *a) any support of any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line is or may be supported, carried or suspended;* *b) any apparatus connected to any such line for the purpose of carrying electricity; and* *c) any wire, cable, tube, pipe or other similar thing (including its casing or coating) which surrounds or supports, or is surrounded or supported by, or is installed in close proximity to, or is supported, carried or suspended in association with, any such line;'*

Reference	Question to	Question	Applicant's Response
			The definition under section 64 is fundamental to National Grid operations and responsibilities to meet our statutory duties under Part 1 of the Electricity Act 1989. This distinction is also of particular importance for Air Insulated Switchgear (AIS) substations that comprise of outdoor electrical circulatory equipment. The **7.16 DASSI [Revision C]** confirms there is no scope to vary the colour and finish of the electrical equipment needed. Whilst some electrical plant and machinery need to be housed in a building for protection, these will be limited in number, comprise of smaller prefabricated buildings integrated within the wider open air electrical plant, machinery and apparatus. However, the Applicant is reviewing the terms of Requirement 12 alongside consideration of the matters raised above concerning the scope of Requirement 12 and the buildings it is expected to cover to establish if greater clarity can be provided on this issue above concerning which part of the authorised development should be subject to design review given the wide definition of 'building' in article 2, either in the Requirement 12 or the DASSI, or both. The Applicant will update the position by Deadline 6. In the meantime, the remaining section of this answer sets out the important role of the DASSI and indicates the structures at each substation site that are intended to be within the scope of Requirement 12 and the DASSI. The DASSI is the control document for the Project, and the primary document against which design quality, assurance and review will be measured and met. The Applicant would therefore like to draw attention to the updated **7.16 DASSI [Revision C]** that provides sufficient design content and where there is limited scope for variation such as colour finish of building/ enclosures this would form part of a Great Grid Partnership design review process. The Applicant also refers to the response given in DES 2.2 with regards to the DASSI.

Reference	Question to	Question	Applicant's Response
			It is anticipated that the Design Review Process will undertake design reviews with reference to Section 5 Design Principles and Scope for Variation in Developing the Detailed Design and in accordance with Section 6 Approach to Detailed Design and Approval Process in the updated **7.16 DASSI [Revision C]** submitted at Deadline 5. Design review for the new substations and extensions will be offered to include a nominated representative of the relevant Local Planning Authorities (from both upper tier and lower tier Local Authorities) by invitation. The below indicates the structures at each substation site that are intended to be within the scope of Requirement 12 and the DASSI: **Norwich Main Substation** • No new buildings are proposed at the Norwich Main Substation extension. **Bramford Substation Extension** • New Gas Insulated Switchgear (GIS) Building • Northern and southern extension of GIS Building. **EACN** • Central control building • Amenities building • Portable Relay Room (PRR) buildings • Dynamic Reactive Compensator (DRC) buildings • Acoustic enclosures (if required). **Tilbury North Substation** • Acoustic enclosures (if required) The final colour of the GIS building and gas insulated hall annex, at the Tilbury North Substation is already captured by Requirement 11.
DES 2.4	The applicant	Design of temporary works and compounds Outline how the design of construction compounds will be	The design of temporary construction compounds and associated temporary works would be controlled by a combination of parameters as assessed in the Environmental Statement (ES) and enforceable controls within **3.1 Draft Development Consent Order [Revision E]**, including

Reference	Question to	Question	Applicant's Response
		controlled, particularly given the length of time that construction works will be ongoing. Are	Requirement 4 secured management plans, ensuring that only development assessed within the ES and secured through the DCO can be implemented.
		there any controls proposed on the height and stacking of site cabins and their colour, or on-site fencing for instance?	**6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** Section 4.8 describes the basis upon which temporary construction compounds were assessed and that they have been assessed on a worst-case basis, including their scale, layout and operational assumptions. It states that there would be a range of compound types, which each one having a typical maximum footprint. It explains how compounds are surfaced and that site cabins are limited to standard modular units up to two storeys in height with any raising only to address constraints such as flood risk. The scope of laydown and storage areas is also confirmed. The locations of compounds are shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**. Table 6.1 of **7.2 Outline Code of Construction Practice [Revision E]** includes specific mitigation measures that directly govern compounds including GG18 (which requires appropriate site layout and configuration of plant, offices and welfare facilities to avoid effects on surrounding receptors), GG17 (which requires potentially disturbing activities within compounds to be located away from sensitive receptors where reasonably practicable), GG29 (which governs the type and purpose of temporary fencing, including the provision of visual and acoustic screening where appropriate), GG26 (which controls construction lighting to minimise visual intrusion) and GG09 (which requires regular inspection and monitoring of compliance with management plans). These are secured by way of compliance with Requirement 4 of **3.1 Draft Development Consent Order [Revision E]**.

Reference	Question to	Question	Applicant's Response
DES 2.5	The applicant All local authorities	Approach to scenarios 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. • 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.	The Applicant continues to engage with relevant stakeholders to reach an agreed position on the outstanding alternative scenarios set out in **8.11 Approach to Scenarios [Revision C]** and intends to provide the requested information by Deadline 7. The Applicant has submitted an updated version of **8.11 Approach to Scenarios [Revision C]** which summarises the latest position at Deadline 5.

3. Air quality and emissions

Table 3.1 Air quality and emissions

Reference	Question to	Question	Applicant's Response
AQ 2.1	The applicant	Sulphur Hexafluoride (SF6) [REP2-092] raises questions concerning SF6 within the electricity transmission network. Your responses to this matter contained in your '…Response to the Oral Submissions Made at the Open Floor Hearings' [REP2-028] and '…Comments on any Further Information or Submissions Received by Deadline 2' [REP3-070] are noted. Your ES Appendix 4.1 - Greenhouse Gas Assessment [APP-131] has assumed that no SF6 equipment will be used in the Project in accordance with National Grid policy. You also refer to SF6 alternatives such as C4 or G3 having a 99% lower global warming potential than sulphur hexafluoride. However, the response falls short of actually saying you are proposing to use either. Confirm you will not be using SF6/ SF6 equipment and how this is to be secured within the Development Consent Order (DCO). Additionally	The Applicant confirms that, in accordance with internal National Grid policy, the Project will deliver SF_6-free switchgear wherever practicable. The design intent is therefore to utilise alternative insulating technologies with substantially lower global warming potential (GWP), including: • 'G3' (Green Gas for Grid) • 'C4' (fluoronitrile-based gas mixtures). Both of these have a GWP approximately 99% lower than conventional SF_6. Notwithstanding this commitment, there is a limited and specific exception at Bramford Substation. The works at this location comprise an extension to existing SF_6 gas-insulated switchgear (GIS). Due to the need to interface with the existing infrastructure, a transition connection is required, which necessitates the inclusion of a small and unavoidable quantity of SF_6 for technical compatibility reasons. The Applicant confirms that: • This represents a localised and minimal use • No reasonable practicable SF_6-free alternative exists for this interface at the current time • All other elements of the Project will be designed to avoid SF_6 use. The Applicant will update **7.2 Outline Code of Construction Practice [Revision E]** at Deadline 6 to include a commitment in Table 6.1 to confirm that any use of SF_6 shall be limited to that

Reference	Question to	Question	Applicant's Response
		clarify what is meant by the references to 'C4' and 'G3 and how the use of C4 or G3 will be secured within the DCO.	which is demonstrably necessary for technical compatibility, and shall be subject to measures to minimise leakage and emissions in accordance with applicable standards and best practice.

4. Biodiversity, ecology and natural environment

Table 4.1 Biodiversity, ecology and natural environment

Reference	Question to	Question	Applicant's Response
BIO 2.1	The applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	Assessment of biodiversity deficit 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'. 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	Part 1: Vegetation removal time period As shown on Image 4.13 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, where the underground cables cross field boundary features (such as hedgerows), the working width would be reduced to 70 m. It should also be noted that the 'potentially affected' vegetation swathe allows for slight movements of the cable route within the Limits of Deviation, and therefore the 50m either side it is not additional to the 120 m total that would be removed to facilitate the Project. In line with the 'Dedham Vale National Landscape' programme presented in Image 4.1 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, the likely worst-case scenario timeframe from vegetation removal to replacement planting is c.4 years (Q1 2027 to Q4 2030). However, it is likely that the majority of vegetation removal will be undertaken between October 2027 and February 2028 to minimise impacts on ecological receptors (i.e. nesting birds). Replacement planting would be undertaken at the earliest opportunity and no later than the first planting season following completion of construction activities on that stage, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision E]**, and on a worst-case scenario by the end of 2030. Following this replacement planting, different habitat types across the Project will take differing time frames to reach maturity and achieve the original baseline habitat condition. This 'time to target condition' factor is built into the Biodiversity Net Gain (BNG) Statutory Biodiversity Metric and a key factor within the calculation

Reference	Question to	Question	Applicant's Response
		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 [AS-026] 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. 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.	of required biodiversity units as set out within **7.1 Biodiversity Net Gain Report [APP-299]**. This means that the longer a specific habitat will take to reach the target condition, the more overall habitat replacement is required to ensure there is no biodiversity deficit from the Project. The majority of habitat within the 120 m cable swathe, impacted by the Project, is arable farmland. This is considered to be a low distinctiveness habitat and easy to replace, reaching baseline condition almost immediately following reinstatement. The most common grassland habitats across the Project will also achieve a similar degree of maturity to the baseline within 1-5 years following reinstatement. Hedgerows can also be created and achieve moderate condition within 5 years, in line with the BNG Statutory Biodiversity Metric guidelines. However, a hedgerow will start to provide habitat connectivity and be used by wildlife within the first year of planting, particularly when the vegetation is protected from deer browsing by guards and/or fencing that help to provide structure and encourage the growth of plants in the field layer. Any replacement woodland planting would take longer for a woodland structure to develop, however within 5 years the replacement trees and shrubs would provide a habitat of value to fauna. Within 10 years of planting the woodland and hedgerow habitats would support most faunal species associated with this habitat, as many woodland species favour a coppice woodland structure that is mimicked by new tree and shrub planting. Part 2: Short-term temporary ecological effects **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** has taken into consideration any short-term temporary effects on ecological receptors. The impact pathways that would lead to short-term effects include effects on ecological receptors during construction, prior to any replacement planting, including killing/injury of protected species, collision risk, disturbance, hydrological changes, habitat loss and

Reference	Question to	Question	Applicant's Response
			fragmentation/severance as set out within paragraph 8.7.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. A working example of this is the potential significant effects to bat foraging and commuting habitat, including during the construction phase (the short-term). Following bat activity surveys, key linear routes (i.e. along hedgerows/tree lines), were identified as offering high value for foraging and commuting bats. Where the Project would have significant impacts to these key linear routes, with vegetation loss of greater than 15 m, potential short-term temporary fragmentation/severance impacts were identified during the construction phase. Mitigation in the form of temporary artificial bat flyways have therefore been proposed to mitigate this temporary short-term fragmentation effect. Artificial bat flyways would be installed at key locations, as shown on **7.4 Outline Landscape and Ecological Management Plan - Appendix E - Bat Flyway Locations [AS-048]**, each night during the active bat season from May to September inclusive, in order to maintain habitat connectivity for commuting and foraging bats in the short-term. On completion of the construction phase, the vegetation would be reinstated, and the temporary flyway removed. Replacement planting of the linear features is considered a medium to long term (>5 years) mitigation measure. Once the hedgerow planting is in place, bats will be able to navigate along and forage over this planting; it does not need to be 'mature' to fulfil this function, and it will not be necessary to maintain the artificial bat flyways post-construction. These mitigation measures are set out in **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. The use of lighting during construction (short-term impact) on key bat foraging and commuting routes has also been identified as leading to a potential short-term disturbance effect. Mitigation in the form of a lighting strategy, to include bat specific measures such as directional lighting, has also been included within **7.4 Outline**

Reference	Question to	Question	Applicant's Response
			Landscape and Ecological Management Plan [Revision E] to mitigate this effect. The overall assessment result, as presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, is that there would be no significant residual effect on bat foraging and commuting during the construction or operational phases of the Project. In relation to potential significant effects on roosting bats, a reasonable worst-case assessment of impacts on roosting bats is included in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. This includes the potential short-term impact of loss of bat tree roosts across the Project during vegetation clearance. Mitigation for this short-term impact on confirmed bat roosts includes working under a Natural England licence and the provision of bat boxes and tree veteranisation on retained trees, as set out within the **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. Medium to long-term mitigation includes the 3:1 replacement trees and the 10 % BNG commitment including for woodland habitats. The Applicant is in consultation with the Local Planning Authorities on additional provision of further bat boxes/veteranisation for loss of 'potential bat roosting features', even where no confirmed bat roosts are identified during surveys which will be included within the next iteration of the Outline Landscape and Ecological Management Plan. The use of lighting during construction (short-term impact) has also been identified as leading to a potential short-term disturbance effect on bat roosts. Mitigation in the form of a lighting strategy, to include bat specific measures such as directional lighting, has also been included in **7.4 Outline Landscape and Ecological Management Plan [Revision E]** to mitigate this effect. The overall assessment result, as presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, is that there would be no significant residual effect on roosting bats during the construction or operational phases of the Project.

Reference	Question to	Question	Applicant's Response
			In relation to breeding birds that make use of hedgerows, the potential short-term impacts of loss or disturbance to active bird nests and loss of available nesting bird habitat have been assessed within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Mitigation has included embedded measures to reduced impacts, with the working areas pinched in at field boundaries to minimise hedgerow loss as far as practicable. Standard mitigation measures in the form of avoidance of the nesting bird season for vegetation clearance where practicable, or nesting bird checks by a suitably qualified Ecological Clerk of Works (ECoW) in advance of vegetation removal, are set out within **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. This approach includes mitigation for potential disturbance effects should an active bird nest be found during these checks, with the requirement for an exclusion buffer to be applied until the chicks have fledged. Given the linear nature of works, sufficient alternative nesting habitat is considered to be present in the locality in the short-term, such that there is no requirement to provide alternative nest sites, such as bird boxes (except for barn owl). In the medium to long-term, habitats would be replaced and the Project commitment to a 3:1 replacement tree compensation strategy and 10 % BNG would provide additional available nesting bird habitat. The overall assessment result, as presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, is that there would no significant residual effect on breeding birds during the construction or operational phases of the Project. A final worked example of this is the potential significant effect on native hedgerows in the short to medium-term. Impacts to native hedgerows have been minimised as far as practicable through embedded mitigation measures, with working areas pinched in at field boundaries to limit the amount of hedgerow loss required. Hedgerow loss is considered to represent a short to medium term

Reference	Question to	Question	Applicant's Response
			significant effect, with hedgerow removal required to facilitate construction although only on a temporary basis (up to 4 years). On completion of the construction phase, hedgerows would be reinstated along existing alignments. Replacement planting of hedgerows is considered a medium to long term mitigation measure, with hedgerows taking up to 5 years to achieve 'moderate condition', as defined by the BNG Statutory Biodiversity Metric, although recently planted hedgerows still fulfil an important ecological function as explained in Part 1 above. Replacement planting would seek to enhance the condition of the hedgerows over and above their baseline value, with proposed hedgerow enhancements including diversifying the native woody species mix and gap planting. Full details of the proposed hedgerow planting are set out within **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. In addition, the Project has committed to delivering 10 % BNG which includes hedgerows as presented within **7.1 Biodiversity Net Gain Report [APP-299]**. This will ensure an overall beneficial effect in the medium-long term on hedgerows in the local area.
BIO 2.2	The applicant	Efficacy of ground level tree assessment (GLTA) for bat roosts Justify your assertion, as stated in response to ExQ1 BIO 1.5 [REP3-074], that ground level tree assessments provide: "a detailed understanding of the natural potential roost resource" and can provide a reasonable worst-case scenario. The ExA notes that the GLTA methodology is summarised in section 3.4 of [AS-	A Ground Level Tree Assessment (GLTA) is a standard bat survey technique, as outlined within the Bat Conservation Trust (BCT) survey guidelines[1], that provides an overview of the suitability of a tree to support roosting bats and the likely type of bat roost (individual or multiple) it would support. While confirmed tree roosts are typically difficult to find even with substantial further survey effort, given the transient nature of summer tree roosts, the GLTA provides an overview of potential roost suitability and therefore the assessment of effects based on GLTA data is considered a worst-case scenario. This approach acknowledges that roosting bats are likely to move between tree roosts in the intervening years between initial survey and planning consent. Given the transient nature of

[1] Bat Conservation Trust. (2023). *Bat surveys for professional ecologists: Good practice guidelines* (4th ed.).

Reference	Question to	Question	Applicant's Response
		034]. However, for the sake of clarity the applicant is requested to provide details of the number and experience of the people who undertook these surveys, the survey timings and to explain how it is possible to undertake a survey of a mature tree from the ground level that can fully assess all of that tree's potential roost features. Also, the applicant is asked to comment on the applicability of this methodology for all bat species that roost in trees.	many tree roosts, pre-construction bat surveys will be undertaken prior to any tree removal to ensure up-to-date locations of bat tree roosts are found. This is a standard approach, has been agreed with Natural England in advance and is considered a proportionate approach to survey effort as shown within **5.9.13 Draft Statement of Common Ground - Natural England [REP4-081]**. The survey methodology, timing of survey and qualifications of the team are set out in **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]** and summarised below. Given the geographic extent of the Project the GLTAs required a survey team totalling 36 individual ecologists with each survey visit using a team of two experienced ecologists. Of the 36 surveyors, 20 individuals held Natural England bat survey licences. The lead surveyor in each pair had at least three years of post-graduate experience and held either a Natural England Level 1 or 2 bat class licence. Those ecologists undertaking surveys using an endoscope held a bat Level 2 class licence that would allow them to cause disturbance to bats, if present. The surveyors followed the BCT best practice guidelines for GLTAs, whereby each tree is scanned with binoculars to identify whether the features listed in Section 3.4 of the Bat Roost Report (**6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]**) were present and to search for signs of use by bats. Endoscopes were used on any features that were accessible from the ground by bat licensed surveyors. As identified in Section 3.6 of **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]** the surveys were undertaken as access allowed between November 2023 and March 2024, between July and December 2024, and between March and September 2025. Given the number of trees that were subject to survey it is not practical to list all specific survey dates here. The majority of surveys (c.85%) were completed over the winter period when it was easier to see potential roosting features.

Reference	Question to	Question	Applicant's Response
			The purpose of the GLTA is to identify whether the tree has features suitable for use by roosting bats. If it does contain features, then an assessment is made with respect to each feature's suitability to support bats. If it is possible to examine the feature from the ground with an endoscope, then more data can be obtained. The GLTA methodology is suitable for all tree roosting bats. It identifies the presence of features and their suitability for use by bats in line with standard guidelines. During the survey if the tree was found to support features suitable for small numbers of bats or individual bats only, it was classified as a PRF-I tree. If the tree supported at least one feature that appeared from the ground to have the potential to be used by a larger number of bats or as a maternity roost, it was classified as a PRF-M tree. These details were recorded for each feature, so a tree may have more than one feature classified as PRF-I or more than one feature classified as PRF-M. Where a tree was of a size and maturity to offer potential roosting bat features, but could not be fully inspected from the ground, the tree was identified as FAR (Further Assessment Required) in line with BCT guidelines to ensure that it would be subject to pre-commencement surveys. Trees classified as FAR were included in the assessment as offering bat roosting potential on a worst-case basis.
BIO 2.3	The applicant	Post-consent assessment work for bats Paragraphs 4.3.7 and 4.3.8 of the Bat Roost Report [AS-034] state that: "if all the trees assessed within the Order Limits were impacted, the following shows the further survey requirements informed by the results of the GLTA:	The Applicant can confirm that trees that have features that are classified as PRF-M (feature with potential to be used by a larger number of bats or as a maternity roost), would require three aerial inspections or emergence surveys as reported in the bat roost report, but only if they are to be impacted by the Project following detailed design. Trees categorised as FAR (Further Assessment Required), that will be impacted by the Project, will require at least one aerial inspection to either confirm suitability or downgrade to NONE (no bat suitability).

Reference	Question to	Question	Applicant's Response
		• 1,877 would require aerial inspections by climbing and/or ladder • 245 would require ground inspection by torch and endoscope • 218 would require emergence surveys (where trees are unsafe to climb or where features are so numerous that emergence surveys are the safest or most effective method for assessing (potential roost features) PRFs) • 648 would not require further survey." Also, 48 trees were identified as having suitability to support hibernation roosts for bats and further surveys on these would be required. The applicant is requested to explain whether or not the "large groups of trees" that are set out in paragraph 4.3.3 of [AS-034] would fall within these numbers cited above or whether they would be within the individual tree numbers cited above. The ExA notes the comments made in response to Braintree DC (page 14 of [REP3-070]) that any trees assessed as a potential roost feature for multiple bats and may therefore be used by a maternity colony (PRF-M) would then require 3 x aerial	The Applicant can also confirm that the numbers of trees in paragraphs 4.3.7 and 4.3.8 of **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]** relate to individual trees that have been assessed within the Order Limits and do not include any trees in the areas identified as groups of trees. Areas (ha) of the groups of trees with potential roosting features are presented in paragraph 4.3.3. However, the numbers of trees referenced by the ExA include all trees within the Order Limits, not just those that will be lost or managed by the Project. The numbers of bat roost potential trees with PRF-M that will be lost or affected managed, based on the current submitted design, are presented within Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Only those trees to be impacted will require further survey. Based on the current design, features to be lost requiring further survey equates to 163 PFR-M trees needing three aerial or emergence surveys between May to September. A further 1,066 FAR trees would need a single aerial inspection to assess PRF classification, before determining further survey requirements (not seasonally restrictive). While this is still a significant number of trees to be surveyed, this is c.50% of the numbers stated in paragraphs 4.3.7 and 4.3.8 of **6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034]**. Detailed design is also underway, with a focus on retention of as many trees as possible. This will reduce the number of bat potential trees to be lost/affected from the reasonable worst-case position presented in the ES and therefore further reduce the number of bat surveys needed. In terms of time frames, between 8 and 10 trees per day can typically be climbed by a pair of licensed and qualified surveyors, depending on the complexity of the climbing requirements for each tree. For the 163 PRF-M this would require approx. 50 survey days to cover the three visits between May and September. One visit on the 1,066 FAR trees would require approx. 106 survey days, but

Reference	Question to	Question	Applicant's Response
		inspections/emergence surveys in line with Bat Conservation Trust Guidelines. Having regard to this and the other proposed further assessment measures, the applicant is requested to set out a timeline, should the Order be made, for how long it would be expected that these surveys would take in total, assuming the worst-case scenario figures stated above. In the context of the envisaged overall construction timescale for the proposed development as set out in Image 4.1 of [AS-030], explain how sufficient resources would be made available in order to ensure that such a potentially substantial amount of survey work would be undertaken prior to the commencement of the construction operations or of any other works that might affect bat tree roosts.	these are not seasonally restrictive. Alternative survey types such as back tracking and radio tracking will also be undertaken where larger groups of trees are present and aerial/emergence surveys are not practical, in line with the pre-application survey approach as agreed with Natural England. Whilst the numbers of trees to be surveyed are significantly less than that indicated within the ExA's question, there is still a large volume of bat tree surveys to be undertaken. Given this, surveys have started over the 2026 season on a precautionary basis, to ensure data is available should consent for the Project be granted. While the surveys need to take place within the correct season before each tree is removed, they do not need to be completed for the whole Project before construction starts. Indeed, it would not make sense to complete the surveys in a single year as licences to remove bat roosts need to be based on up-to-date information. The staged programme for further bat surveys has been carefully considered to ensure sufficient time is allowed to undertake the necessary surveys in line with Bat Conservation Trust guidelines[2] and to inform a future bat licence application.
BIO 2.4	Natural England	District level licensing approach for great crested newt (GCN) In response to the ExA's EXQ1 BIO 1.18, the applicant in [REP3-074] has stated that a signed Impact Assessment and Conservation Payment Certificate for GCN has been obtained from Natural England and that you have signed it, confirming that	This question is not directed at the Applicant.

[2] Bat Conservation Trust. (2023). *Bat surveys for professional ecologists: Good practice guidelines* (4th ed.).

Reference	Question to	Question	Applicant's Response
		the applicant will apply for a GCN District Level Licensing. Please either provide a copy of this or confirm that you are satisfied with the applicant's approach in relation to GCN.	
BIO 2.5	The applicant	Letters of no impediment for bats, badger, hazel dormouse and water vole The ExA notes the letters from Natural England that the applicant has provided in [REP4-307]. Whilst these state that for all species (except bats as a licence is not yet required) Natural England sees no impediment to licenses being issued, it is also noted that a number of other matters are still not agreed by Natural England or might require further work, such as bait marking surveys for badgers and justification of a 3m buffer either side of working areas for water vole when a 5m buffer is typically required. Comment on all the outstanding matters raised by Natural England in its 'initial draft application' letters contained in [REP4-307].	The Letters of No Impediment (LONIs) confirm that based on the information and proposals included within the draft licence application(s), Natural England sees no impediment to a licence to derogate for impacts being issued, should development consent be granted. The draft licence applications are based on the design and survey information available at the point of submission of the development consent application. The outstanding matters outlined within the LONIs primarily relate to details which will be confirmed through the detailed design stage, pre-commencement surveys and detailed construction programme which will only be known post-consent. The Applicant confirms that all outstanding matters identified by Natural England can and will be addressed within the final licence applications, with no significant change to the mitigation principles agreed during the draft licensing process. Please see below comments on outstanding matters to be agreed with Natural England: All applications: • Named ecologist: Specific details of the named ecologist(s) are unknown at this stage. The Applicant confirms that a named ecologist(s) with the required level of experience for each species will be appointed prior to the submission of the final licence applications. • Survey information: In line with survey validity windows, pre-construction surveys for bats, water vole and badger will be

Reference	Question to	Question	Applicant's Response
			undertaken post-DCO consent. The Applicant confirms that all survey data requested by Natural England will be obtained through the pre-construction surveys (for example, badger sett entrance locations) and will be included within the final licence applications. • Assessment: An updated assessment for each species will be undertaken following the detailed design and pre-construction surveys sufficient to inform the licence applications. The detailed design will seek to avoid impacts to protected species as far as possible. Where this is not possible, additional justification or mitigation will be provided within the final licence applications as requested by Natural England. • Construction programme: Details relating to construction specifics, such as proposed timings, machinery requirements and baseline disturbance levels will be confirmed post-DCO consent. The Applicant confirms that the final construction programme will adhere to best-practice timings unless otherwise agreed with Natural England. All details requested by Natural England relating to the construction programme will be included within the final licence applications. Water vole: • Vegetation buffer: A 3 m buffer distance has been proposed in line with the displacement protocol outlined within The Water Vole Mitigation Handbook[3] which states '*remove vegetation on the bank face within the area subject to development works, plus at least and additional 3m either side of the working area, and on the bank top (i.e., at least 3m back from the bank)*'. Badger: • Bait marking: The Applicant will consider the use of bait marking if there are areas with a high number of setts to be impacted

[3] Dean, M., Strachan, R., Gow, D. and Andrews, R. (2016) *The Water Vole Mitigation Handbook*. London: The Mammal Society.

Reference	Question to	Question	Applicant's Response
			within close proximity of the construction works following the detailed design, or, if no bait marking is proposed, sufficient justification will be provided within the final licence application. Dormouse: • Population monitoring: The Applicant's justification for not including population-level monitoring within the licence application relates to the small-scale of impact at each dormouse site, which will be confirmed through the detailed design. The Applicant confirms that this matter will be agreed with Natural England post-DCO consent following the detailed design. • Compensatory planting: In the absence of the final planting schedules, the Applicant is unable to provide this level of detail at this stage. The Applicant confirms that this will be agreed with Natural England during the final licence application.
BIO 2.6	The applicant	Post-development management, monitoring and adaptive management Explain how the creation of habitat other than for individual trees, hedgerow, shrubs and woodland, for example the proposed grassland creation at Thrandeston Meadow CWS and Sproughton Park CWS, would be considered to fall within the ambit of R9 of the dDCO that refers to replacement planting? If not, then how is the post-development management, monitoring and adaptive management for these other habitats to be secured and explain how this work would be undertaken in practice?	Other replacement planting, habitat creation, management and monitoring details, including the methods of grassland reinstatement in Thrandeston Marsh County Wildlife Site (CWS) and Sproughton Park CWS, are detailed within **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. **7.4 Outline Landscape and Ecological Management Plan [Revision E]** is secured via Requirement 4 (Construction Management Plans) of **3.1 Draft DCO [Revision E]**.

Reference	Question to	Question	Applicant's Response
BIO 2.7	Natural England	Applicability of NatureScot best practice guidance In its response to ExQ1 BIO 1.12 the applicant in [REP3-074] has cited guidance from NatureScot, 2017, updated 2025, 'Recommended bird survey methods to inform impact assessment of onshore windfarms', that in turn is referenced as being broadly similar in terms of survey requirements and methodology in the NatureScot, 2025, guidance 'Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds', to justify its approach to not specifically surveying for, in particular, farmland bird species. Comment on the applicant's approach and the applicability of NatureScot's guidance in relation to the location and nature of this proposed development, such as an energy grid connection project in eastern England.	This question is not directed at the Applicant.
BIO 2.8	All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	Monitoring the effects on birds 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	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		operation of the proposed development either with or without mitigation and therefore additional monitoring or adaptive management is not considered necessary or proportionate. Do you agree with the applicant's comments in this regard, if not then please explain why and set out what additional monitoring and (if necessary) adaptive management you would wish to see secured.	
BIO 2.9	The applicant	Assessment of impacts on birds The ExA notes the applicant's response in [REP3-070] to the Bird Collision Matrix submitted at deadline 2 [REP2-108]. Pylons East Anglia Limited in its deadline 4 submission [REP4-369] has queried the assessment of impacts on birds and has provided evidence of the species of birds that are involved in collisions with power lines and potential other locations these species are noted as occurring. In light of the Pylons East Anglia deadline 4 submission, provide any additional comments you may wish to make on this matter.	The Applicant has provided a comprehensive response to the Pylons East Anglia Limited Deadline 4 submission [REP4-369] in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [Revision A]** (BIO 1.12). This covers responses to each of the points raised in the Pylons East Anglia submission. In addition, further response to the evidence of collision injuries and the Bird Collision Matrix can be found at Table 2.1 in **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** (BIO 1.12 and BIO 1.13). Analysis of the British Trust for Ornithology (BTO) data used in the Bird Collision Matrix has also been undertaken, and an account of the Applicant's interpretation of this dataset is provided in the response. In summary, the Applicant does not consider this to be reliable evidence that the Project poses significant collision concern to a range of species due to the following: • Specific cases of bird collisions with overhead lines correspond with areas where smaller lower voltage lines are positioned within or adjacent to designated sites for birds. The Project avoids such sites. Smaller overhead lines (in comparison to the 400 kV of the Project) can present higher collision risk to birds as

Reference	Question to	Question	Applicant's Response
			their placement has not been informed by impact assessment, in contrast to the routeing of the Project. • Difference in locality of Dungeness and the Project, with the former located in an area designated as an important bird area. As identified above the routeing of the Project has taken care to avoid such sites. • BTO data on ringed bird deaths due to collision is spread across many years (earliest records from 1908). This indicates that the frequency of collisions is low contextually, with mortality from vehicles significantly higher. • BTO data also does not differentiate between collisions with different voltage overhead lines or with other wired infrastructure such as electric fences. It is possible that these features would account for the death of passerines. • The BTO data is primarily concentrated along the coast, wetlands and built-up areas (the latter likely due to a network of low wires). The Project has avoided the important bird habitats along the coast, and the Applicant has surveyed wetland corridors which link coastal habitats to inland habitat and not identified collision risk as a significant effect. The Applicant recognises that bird collisions with overhead lines do occur, and there is a risk of mortality as a result of the Project; however, in the context of an Ecological Impact Assessment, the collision risk will not have a significant impact on the overall population of the bird assemblage present. Natural England has agreed with this conclusion in a Habitats Regulations Assessment context. The Applicant has completed a robust assessment of impacts on birds through a comprehensive desk-study (to identify hotspots of bird activity) and targeted surveys in accordance with the NatureScot industry best practice guidance (guidance produced by Scottish Nature Agency but recognised as most appropriate guidance for assessing such impacts across the UK) titled Guidance

Reference	Question to	Question	Applicant's Response
			- Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds[4]. This did not identify any locations of notable collision concern. The mitigation hierarchy has been followed, with important bird areas (including designated sites for birds) being avoided while bird diverters are proposed on a precautionary basis at the River Waveney and Ardleigh Reservoir despite collision risk being assessed as low and not significant. Studies have shown bird diverters do reduce collision risk. Examples of these studies are given in NatureScot (2025) including Frost (2008)[5] and Bernardino *et al*. (2019)[6]. The Frost study is most relevant to this Project as it was focussed on Abberton Reservoir in Essex, where it demonstrated the effectiveness of reducing wildfowl mortality through the use of bird diverters, particularly for swans. A total of 28 mute swan collisions were recorded over spring 2004 and 2006; however, following the installation of bird diverters, this number dropped to one mute swan over spring 2007 and 2008 combined. Line marking is widely regarded as a suitable mitigation option where a risk of collision has been identified. In summary, the Applicant has assessed the impacts in line with best practice guidance and national policy (National Policy Statement (NPS) EN-5 (2024)) and concluded no significant effects to birds, the Applicant has followed the mitigation hierarchy and will implement appropriate mitigation in accordance with the requirements set out in NPS EN-5 (2024).

[4] NatureScot (2025) *Guidance - Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds*

[5] Frost, D. 2008. The use of 'flight diverters' reduces mute swan *Cygnus olor* collision with power lines at Abberton Reservoir, Essex, England. *Conservation Evidence,* 5 (83-91)

[6] Bernardino, J., Martins, R.C., Bispo, R. & Moreira, F. 2019. Re-assessing the effectiveness of wire-marking to mitigate bird collisions with power lines: A meta-analysis and guidelines for field studies. *Journal of Environmental Management*, 252 (109651)

Reference	Question to	Question	Applicant's Response
BIO 2.10	The applicant	Additional bird diverters SWT in its deadline 4 response [REP4-373] considers that an additional area to the south of pylon RG088 should also have bird diverters installed, or that this should be monitored for bird casualties with bird diverters then installed as an adaptive management measure if required. Comment on SWT's proposal.	The Applicant acknowledges Suffolk Wildlife Trust's request for additional bird diverters within the Waveney Valley and has provided a response in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [Revision A]** submitted at Deadline 5. Following further review of the area, the Applicant still considers the span between pylons RG87 and RG88 as the only span requiring bird diverters across the Waveney Valley corridor. No clear need for further bird diverters in the area has been identified. The Applicant considers this span to cover the primary flight path of birds moving along the Waveney Valley corridor post-construction. This is due to the presence of pylon RG088, immediately south of the river channel, which will provide a visual marker within the flight path. The woodland to the immediate south-east of the pylon is to be retained; it is expected that this would also influence bird movement, encouraging flight paths either to the north of, or above, the conductors. Collectively, the pylon and woodland reduce the likelihood of collision risk in this location. A materially elevated collision risk south of pylon RG088 has not been identified that would justify diverters in this location. It is also important that the approach to diverter provision is applied consistently across the route, ensuring that mitigation is evidence-led and proportionate, in accordance with the mitigation hierarchy. Regarding post-construction monitoring, this is not considered necessary in this instance as the proposed bird diverters are considered appropriate and proportionate to mitigate the risk of collision. The assessment has identified that the level of risk has been suitably addressed through embedded design and mitigation measures, and there is no evidence to indicate a residual risk that would warrant further monitoring. Accordingly, additional post-construction monitoring is not considered justified.

Reference	Question to	Question	Applicant's Response
BIO 2.11	The applicant	Potential impacts on Wenham Grove ancient woodland Suffolk CC in Table 6 of its deadline 4 submission [REP4-335] has raised concerns that any works area or access road should be moved outside of a 15m buffer with Wenham Grove, which has now been classified as ancient woodland. In Table B.2 of the Ancient Woodland Technical Note – Part 2 [REP3-059] the applicant states that the Wenham Grove cable sealing end would be located 12m from the woodland boundary but that there is a commitment to no physical works or breaking ground within 15m of any ancient woodland. Please clarify this.	The Applicant notes that clarification is required regarding the relationship between the design and commitments. Table B.2 of **8.10.1 Ancient Woodland Technical Note – Part 2 [REP3-059]** presents a worst-case assessment of potential impacts to Wenham Grove Ancient Woodland in the absence of mitigation, based on a precautionary and indicative 21 m working swathe for the access road to the Wenham Grove Cable Sealing End (CSE) compound. Within the assessment, the woodland is shown to be approximately 12 m from the edge of the swathe. The assessment is intended to identify locations where potential significant effects may occur and where further, site-specific mitigation is required, which is subsequently secured through commitments within **7.2 Outline Code of Construction Practice [Revision E]** and through mitigation measures set out in **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]**. The 21 m working swathe represents a precautionary design allowance and does not define the final extent of construction works. Commitment B34 within **7.2 Outline Code of Construction Practice [Revision E]** secures that the access road and associated working areas will be micro-sited to avoid the 15 m root protection area (RPA) for the woodland. At detailed design the presence of Wenham Grove Ancient Woodland will be treated as a key constraint, and the design refined in line with this commitment. The Applicant can confirm that Wenham Grove CSE compound can be sited within the limits of deviation as presented in **2.3 Works Plans - Section C [REP4-015]**, whilst maintaining the required 15 m offset from the Wenham Grove Ancient Woodland and be located outside the Environment Agency Flood Zone 3, as illustrated in **BIO 2.11 Appendix C**.

Reference	Question to	Question	Applicant's Response
BIO 2.12	The applicant	Length of hedgerows affected As stated in Table 8.23 of ES Chapter 8 [AS-026] there would be a temporary habitat loss of 30.14 kilometres (km) of 'native hedgerows' and a temporary habitat loss of 5.54km of 'species rich important hedgerows'. For the sake of clarity, please confirm that the overall length of temporary habitat loss for hedgerows is predicted to be 35.68km, i.e. both of these figures added together rather than the species rich important hedgerows being a subset of the native hedgerows' figure.	The Applicant can confirm that the Project will lead to the temporary removal of 30.14 km of native hedgerow total, of which 5.54 km has been identified as species-rich and important under the Hedgerows Regulations 1997. This 5.54 km is not additional hedgerow loss, but a subset of the 30.14 km stated.
BIO 2.13	The applicant	Waveney and Little Ouse Landscape Recovery (WaLOR) Project SWT in [REP4-373] is concerned about potential conflicts with the WaLOR project and would wish to see a greater degree of control set out in the outline LEMP (or the draft DCO). Comment on this.	The Applicant can confirm that Section 9.9 of **7.4 Outline Landscape and Ecological Management Plan [Revision E]**, submitted at Deadline 5, has been updated to strengthen the wording around engagement between the Applicant's Main Works Contractor(s), UK Power Networks and the WaLOR project team during detailed design.
BIO 2.14	The applicant	Formulation of the final Biodiversity Net Gain (BNG) metric and how BNG measures are to be secured In response to EXQ1 BIO 1.20 the applicant states that "The full details of the BNG unit requirements is presented within 7.1 BNG Report [APP-299]. It is expected that through detailed design the impacts on trees	**How the BNG position will be finalised** The BNG Assessment provided within **7.1 Biodiversity Net Gain Report [APP-299]** represents an initial calculation based on the current stage of the Project and would be updated and refined at key milestones to further develop the forecast for net biodiversity change. Once the detailed design has been completed, the Applicant will recalculate the number of biodiversity units using the Statutory Biodiversity Metric. This will inform the Interim BNG Assessment(s) reflecting any updated habitat changes (further

Reference	Question to	Question	Applicant's Response
		and hedgerows and other habitats will reduce overall and therefore the overall BNG requirement will also be reduced." Set out the process for how the outline BNG requirements and measures as detailed in [APP-299] would be worked up into becoming the final BNG requirements and measures that would be proposed to landowners. Justify why the need for approval of final BNG measures, for example via the mechanism of submitting a Final BNG Report for the approval of local authorities and/or NE, is not specifically secured within Schedule 3 (Requirements) of the draft DCO [REP4-037] and why the BNG Report is not listed as a certified document in schedule 19. In answering this question explain how you intend to consult with relevant landowners, local authorities and other interests to ensure a suitable suite of BNG measures would be developed and who in your organisation would be accountable for undertaking this work, for example the Ecological Clerk of Works.	losses or reductions in losses). It will also reflect any embedded mitigation and design refinements (e.g. reduced impacts on trees, hedgerows and habitats). The Applicant will submit this assessment(s) to the relevant Local Planning Authorities within two months of completing the relevant detailed design(s). This step ensures that all parties have a shared and up-to-date understanding of the Project's BNG requirement. **Securing on-site BNG through the Final LEMP(s)** On-site habitat creation, enhancement and management will be secured through the Final Landscape and Ecological Management Plan(s) (LEMPs) approved under Requirement 4 of **3.1 Draft DCO [Revision E]**. The Final LEMP(s) will include: • Detailed habitat creation and enhancement proposals • Final landscape plans for each Environmental Area • Management prescriptions to achieve target habitat condition • A monitoring and adaptive management programme. Monitoring will be undertaken by a competent ecologist(s), who will assess progress against the Final LEMP(s) and identify and secure remedial actions if required. The Environmental Areas will be within land owned by the Applicant. Therefore, delivery and long-term management of the habitats will be directly controlled by the Applicant. **Final BNG Assessment post-construction** Following the completion of construction, the Applicant will: • Re-run the Statutory Biodiversity Metric to reflect the actual ('as built') post-construction position • Produce a Final BNG Assessment • Submit the Final BNG Assessment to Local Authorities within six months of the completion of construction.

Reference	Question to	Question	Applicant's Response
			The Final BNG Assessment will identify whether the Project has achieved the committed 10 % BNG on-site and any deficits, which will be purchased as off-site biodiversity units. The Interim Assessment(s) will have however provided the Applicant and Local Planning Authorities with a good indication of the likely outputs, although the Final BNG Assessment will confirm the 'as built' post-construction position. **Approach to off-site BNG** While every effort has and will be made to deliver the required BNG on-site, given the scale and nature of the Project, a 10% BNG is not achievable within the Order Limits. The Final BNG Assessment will show the number of biodiversity units which have been achieved on-site, and identify the deficit in relation to the 10 % BNG commitment. The Applicant will then implement a Biodiversity Offsetting Scheme to address the on-site deficit which will be secured by a legal agreement. The Applicant has provided an updated in relation to the progress of this legal agreement in response to ExQ2 GEN 2.2. This will involve: • Purchasing biodiversity units from third-party providers which will be on the Biodiversity Gain Site Register or be at a 'register ready' stage having met all the necessary requirements • Ensuring all units are secured for at least 30 years through appropriate legal agreements • Prioritising sites based on proximity to the Project, alignment with Local Nature Recovery Strategies (LNRSs), habitat type and condition, deliverability, cost and timing of delivery. The Applicant is already proactively engaging with third parties regarding securing off-site units. In response to written question BIO 1.47 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant provided an update on the detailed discussions which have been held with Suffolk Wildlife Trust regarding the Waveney and Little Ouse Recovery (WaLOR) project

Reference	Question to	Question	Applicant's Response
			on the potential delivery of biodiversity units within the scheme. These discussions are continuing positively. National Grid is still finalising the tender criteria, but weight will also be given to biodiversity units that can: • Be delivered in accordance with the Lawton Principles of 'more, bigger, better, joined' • Demonstrate the delivery of biodiversity units with quantifiable co-benefits including, but not limited to, ecosystem services, climate adaptation and resilience, species abundance, community benefit, and environmental education and skills (EELS). The Applicant aims for all off-site units to be secured before electrification of the Project. **Why a separate DCO Requirement is not proposed for the Final BNG approval** The Applicant considers that additional approval mechanisms in the DCO are not necessary for a number of reasons. Firstly, the existing proposed controls are appropriate and proportionate. On-site BNG is already secured under Requirement 4 of **3.1 Draft DCO [Revision E]**, through the Final LEMP(s), which requires approval by Local Planning Authorities. These plans include all relevant habitat, management and monitoring details. The Statutory Biodiversity Metric and methodology will not change from that assessed in **7.1 Biodiversity Net Gain Report [APP-299]**, which has been examined. Secondly, off-site biodiversity units will be legally secured via section 106 agreements between biodiversity unit providers and planning authorities, or Conservation Covenants with Responsible Bodies as part of the registration process. These agreements outline the legal obligations and responsibilities of the landowner in creating and maintaining biodiversity improvements. These mechanisms already provide enforcement and long-term security.

Reference	Question to	Question	Applicant's Response
			The Project spans 13 Local Planning Authority areas; requiring formal approval of off-site BNG measures from all authorities will introduce complexity and potential delay. Instead, the Applicant will ensure transparency through reporting and clear site selection criteria, as set out above. Thirdly, BNG is a voluntary commitment for the Project, but the Applicant has nonetheless committed to delivering 10 % BNG. The approach taken is therefore proportionate to its voluntary status. **Role of the Section 106 unilateral undertaking** The Applicant will secure its commitment to 10 % BNG through a Section 106 unilateral undertaking. This approach is considered appropriate because: • It provides enforceable obligations equivalent to a bilateral agreement • It avoids the need for multiple authorities to be parties to a single agreement • Local Planning Authorities retain full enforcement powers. **Consultation, stakeholder and landowner engagement** The Applicant will continue to engage with key stakeholders throughout the process. Local Authorities will review the Interim and Final BNG Assessments, and will approve the Final LEMP(s) secured under Requirement 4 of **3.1 Draft DCO [Revision E]**. Although formal approval is not required for off-site BNG, all relevant information will be shared with Local Planning Authorities for transparency. National Grid has established a Qualifying Utilities Dynamic Market (QUDM) under the Procurement Act 2023 for the delivery of off-site biodiversity gains, marine restoration and enhancement, and climate contributions. Landowners who have land that they wish to use to provide biodiversity units to the Project will need to register on the QUDM.

Reference	Question to	Question	Applicant's Response
			Accountability and delivery Responsibility for BNG delivery will sit with the following parties: • The Applicant, for preparation of Interim and Final BNG Assessments, delivery of on-site habitat measures, provision of Biodiversity Offsetting Scheme and procurement of off-site biodiversity units • Competent ecologist(s) appointed by the Applicant, who will manage and oversee implementation of any on-site BNG during construction and monitoring of on-site habitat during its 30-year management and monitoring period • Responsible Bodies for off-site units. This will include long-term monitoring and enforcement of off-site BNG agreements.
BIO 2.15	Five Estuaries and North Falls Offshore Wind Farms	Impact of the proposed development on Five Estuaries and North Falls Offshore Wind Farms The ExA notes that the Order granting approval for the North Falls Offshore Wind Farm was made by the Secretary of State on 14 May 2026. As indicated by the applicant in Table 6.1 of the Report on Interrelationship with Other Infrastructure Projects [REP4-296] the proposed development would potentially impact on the mitigation/enhancement/BNG measures that have been proposed for some other projects. In relation to both Five Estuaries and North Falls Offshore Wind Farms the applicant states in Table 6.1 that "The Project interacts with the … mitigation area,	This question is not directed at the Applicant. Five Estuaries is content that appropriate levels of cooperation are secured through a private tripartite cooperation agreement between the parties. This covers the proposed interactions of the Applicant's proposed Ardleigh Road widening and operational drainage works on Five Estuaries' mitigation and enhancement area. Co-operation between Five Estuaries and the Norwich to Tilbury Project has taken place in line with good practice and the policy considerations in the Energy NPS' particularly EN-5 which requires that *'2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;'*. Particularly, Five Estuaries, National Grid and the North Falls Offshore Wind Farm project have been co-operating since the announcement of the grid connection points in 2022 with the objectives of reducing cumulative impacts particularly in relation to traffic and transport (including for construction traffic and site access), landscape and visual and operational noise. Reciprocal protective provisions have been agreed between both parties and are included in the respective DCOs. These provisions provide each

Reference	Question to	Question	Applicant's Response
		but sufficient coordination is secured between the two projects to minimise any impacts." Five Estuaries and North Falls are requested to provide comments on this.	undertaker sufficient protection from overlapping development consent and compulsory acquisition powers providing sufficient assurance to each Examining Authority and the Secretary of State that each DCO can be granted as sought, as demonstrated by the granting of the Five Estuaries and North Falls DCOs.
BIO 2.16	The applicant	Impact of proposed development on other projects' mitigation measures. In Table 6.1 of the Report on Interrelationship with Other Infrastructure Projects [REP4-296] a number of other projects are identified by the applicant where the proposed development has the potential to interact with the mitigation or enhancement measures being proposed for these other projects. Examples of this include planning application reference 2024/3750 for the development of a 400 megawatt energy storage system where in [REP4-296] the applicant states that: "Pylon RG4 is proposed within the central portion of the site where wildflower planting is proposed." For all of these potential interactions explain what negotiations have taken place with these other developers, what measures you would take to ensure that these other projects would be able to deliver their consented mitigation/ enhancement proposals and how these measures would be secured.	Table 6.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** provides information about the extent to which the Project's Order Limits interact with mitigation or enhancement measures of other projects. The Project does not affect the mitigation or enhancement measures of all of the projects listed in Table 6.1; whether the Project does affect the mitigation or enhancement measures of another project is confirmed in the 'Interaction with the Project' column in Table 6.1. The precise nature of interactions with mitigation / enhancement of other projects will be determined at the detailed design stage of the Project. Similarly, some of the other projects' proposals still may not be fixed. **Explain what negotiations have taken place with these other developers**: Table 11.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** lists the Statements of Common Ground with the other project developers whose developments have the potential to interact with the Project. To support cross-referencing, Tables 6.1 and 11.1 use the same ID and planning application references. In addition, as confirmed in the Statements of Common Ground where applicable, and in **8.7 Statutory Undertaker Tracker [Revision D]**, the Applicant has entered into a number of side agreements with developers as well as negotiations on protective provisions. **What measures you would take to ensure that these other projects would be able to deliver their consented mitigation/ enhancement proposals:**

Reference	Question to	Question	Applicant's Response
			The Applicant has added commitment S07 to **7.2 Outline Code of Construction Practice [Revision E]**, submitted at Deadline 5. This commits the Applicant to engagement with another project where the mitigation / enhancement measures of that other project fall within the Project's Order Limits, to facilitate delivery of both parties' projects. The Applicant maintains that this general commitment is the most appropriate measure as it applies to all other projects in this circumstance, including those potentially to be identified in the Applicant's future update to **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**, as well as those where negotiations remain to be concluded. The Applicant cannot ensure or secure the delivery of mitigation by third parties on their projects, as each project is independently required to deliver its own mitigation through its respective consent. Nonetheless, the proposed engagement mechanism in commitment S07 ensures that the Applicant takes steps to achieve coordinated mitigation / enhancement proposals where they interact. Moreover, as explained in paragraph 3.14.3 of **3.2 Explanatory Memorandum [REP4-039]**, Article 10(2) of **3.1 Draft DCO [Revision E]** confirms that any other planning permissions or development consent orders which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or development consent order. **How these measures would be secured**: Commitment S07 is in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision E]**, secured by Requirement 4 of Schedule 3 to **3.1 Draft DCO [Revision E]**.

Reference	Question to	Question	Applicant's Response
BIO 2.17	The applicant	Assessment of cumulative effects on biodiversity In response to ExQ1 GEN 1.26 the applicant in [REP3-074] has stated, in relation to other projects that are proposed to connect to the EACN substation, that : "The effects that the footprint of these (other) developments would have on habitats and the effect these developments would have on mobile species were reviewed to identify whether there was potential for inter-project cumulative effects." Provide evidence of how this review process was conducted and clarify whether the assessment of cumulative effects related to only the footprints of the other substations once built or to other elements of these projects including their cable corridors and potentially overlapping construction timescales with the proposed development.	**8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]** sets out how the Norwich to Tilbury Project worked with the two Nationally Significant Infrastructure Projects that interact with the EACN, namely North Falls Onshore Wind Farm and Five Estuaries Windfarm. The assessment of cumulative effects is presented in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and summarised in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. For the assessment of cumulative effects presented in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**, the impact assessments and other supporting documents that related to ecological impacts for North Falls Onshore Wind Farm and Five Estuaries Windfarm were reviewed to understand what effects the other developments would have. These application documents were reviewed to identify whether there were overlaps in terms of footprint, timescales / programme and ecological receptors. The Tarchon Interconnector Project is proposed to connect into the proposed new EACN Substation and the development was added to the list of projects assessed in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. Although no ecological baseline information is currently available, it is anticipated that mitigation for the Tarchon project would be designed to ensure that there are no significant residual effects that could lead to inter-project cumulative effects with the Norwich to Tilbury Project. Where the potential for significant effects was identified, this was compared with the effects that the Norwich to Tilbury Project would have to identify whether there could be an inter-project cumulative effect. As the Norwich to Tilbury Project would not affect the marine

Reference	Question to	Question	Applicant's Response
			environment, all documentation relating to marine impacts was not reviewed as there is no potential for inter-project cumulative effects. The first consideration when reviewing the application documents was which ecological receptors would be affected and whether the Norwich to Tilbury Project would affect the same receptors. For example, a significant effect was identified by Five Estuaries Offshore Wind Farm on farmland birds (principally skylark). The results of the bird surveys supporting the Norwich to Tilbury Project were reviewed to look at the number of skylarks that would be affected. Very small numbers of skylark were recorded in the areas affected by the Norwich to Tilbury Project. As identified previously, skylark, like other passerines, are not considered to be at risk of collision with overhead lines and so the assessment focussed on the farmland habitats likely to be impacted that would support skylark that would be affected by the footprint of the Norwich to Tilbury Project. This assessment also took account of timescales / programme as there is likely to be an overlap in construction period for the Five Estuaries Offshore Wind Farm project and the Norwich to Tilbury Project. An inter-project cumulative effect was not identified with this development with skylark on the basis that the Norwich to Tilbury Project would not materially add to the effect that the Five Estuaries Offshore Wind Farm development would have. The reference to mobile species is because habitats and the plant species associated with them are not mobile; all other ecological receptors are mobile and have various Zones of Influence as identified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. For wide ranging species it is important to consider whether the Norwich to Tilbury Project with the other developments could affect the movement of species across the landscape. It is not just a case of looking at each other development's final land-based footprint, but all areas that would be affected by these developments. The assessment reviewed each other development in turn, each effect, and whether with the Norwich to Tilbury Project there could be a significant effect, in the short, medium or long-term.

5. Compulsory acquisition, temporary possession and land rights

Table 5.1 Compulsory acquisition, temporary possession and land rights

Reference	Question to	Question	Applicant's Response
CA 2.1		Anglia Ruskin University (ARU) Writtle ARU Writtle in its submission at deadline 4 **[REP4-348]** amongst other matters has raised the issue of compulsory acquisition of its land or interests. Please address the comments raised in particular whether there is a case for the compulsory acquisition of such land and interest in the context of the potential for road closures to address the need for the mitigation works.	The Applicant has provided a response to this question in **8.4.11.1 Applicant Response to ARU Writtle ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2**. The Applicant acknowledges that ARU Writtle raise a number of matters in its Deadline 4 submission **[REP4-348]**, some of which are inter-related, and therefore to aid the reader, the Applicant has sought to provide a single document responding to all matters raised by ARU Writtle rather than split its response across multiple documents.
CA 2.2		**Land Rights Tracker [REP4-051]** The latest version of the Land Rights Tracker submitted for the **Examination Library [REP4-051]** does not include the notes and information that was provided in the previous version **[REP3-018]**. At the next iteration of the Land Rights Tracker please ensure these are included and any updates included.	The Applicant has reinstated the preface notes associated with the Detailed Land Rights Tracker (DLRT) (and wider 'Lands' schedules requested by the ExA), as provided at Deadline 3. The original drafting from Deadline 3 has been preserved for continuity, and amendments reported in tracked changes at Deadline 5 in respect of the DLRT, and associated engagement with affected persons.

6. Draft Development Consent Order

6.1 Draft Development Consent Order – General

Table 6.1 Draft Development Consent Order – General

Reference	Question to	Question	Applicant's Response
DCO 2.G1	The Applicant	DCO General 1 The ExA notes the response of the local authorities in relation to the action points from Issue Specific Hearing (ISH) 2 [EV9-023], action point 2. It also notes the applicant's response to ExQ1 SET 1.5 **[REP3-074]**, as well as the Secretary of State's decision letter for The North Falls Offshore Wind Farm Project dated 14 May 2026. Confirm where you have used the term "where practicable" or any variant of that term, when describing mitigation measures, as set out in the outline: Code of Construction Plan (CoCP); Construction Traffic Management Plan (CTMP); Public Rights of Way Management Plan (PRoWMP); LEMP; Archaeological Mitigation Strategy (AMS); and Written Scheme of Investigation (WSI), that such mitigation have been considered in the assessed worst-case scenarios.	Please see **Appendix D** for the Applicant's response to this question.

Reference	Question to	Question	Applicant's Response
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.	This question is not directed at the Applicant.

6.2 Draft Development Consent Order – Articles

Table 6.2 Draft Development Consent Order – Articles

Reference	Question to	Question	Applicant's Response
DCO 2.A1	The Applicant	Articles - General In its response to ExQ1 **[REP3-074]** at question HE1.10, the applicant responds "where circumstances may lead to a longitudinal or lateral change in position, the project has a robust internal governance and assurance process to ensure compliance with the DCO, to ensure the change does not give rise to any materially new or materially different environmental effects, and to secure mitigation where relevant". Provide details of this internal governance and assurance process, how	The Applicant has addressed this point in response to Babergh and Mid Suffolk District Council **[REP4-320]** (Response to Part F) in **8.4.13 Applicant's Response to Comments on its ExQ1 Responses [Revision A]**.

Reference	Question to	Question	Applicant's Response
		compliance with that process is secured within the DCO and how such changes in pylon position will be communicated with the relevant local authorities.	
DCO 2.A2	The Applicant	Article 1 (Interpretation) Braintree DC in its response to ISH2 Action Points **[REP4-323]** at action point 11, which asked Local Authorities to comment on the applicant's position in response to ExA question DCO 1.A7 concerning the definition of "maintain", upholds its concern the applicant's current approach where activities would be permitted on the basis that they do not give rise to any materially new or materially different environmental effects from those identified in the ES. It considers this approach relies on a broad and untested assumption, without sufficient clarity as to how such effects would be assessed, controlled or enforced in practice. It notes you refer to precedent and consider that external oversight is neither necessary nor appropriate in determining whether effects would be materially new or different. It also notes you refer to your statutory duty to maintain a safe and efficient transmission network. However, the Council does not consider that either precedent or statutory duty addresses the core issue of how potential environmental effects arising from	The Applicant refers to its responses to comments on these issues on page 158 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**, page 130 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and pages 167 and 175-176 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant notes the concern raised, however, it would reiterate that as a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. As transmission licence holder, the Applicant is the appropriate body with the expertise to discharge its statutory duties in respect of electricity equipment. It is essential that the Applicant is not delayed or prevented from carrying out essential maintenance that enables it to comply with this duty. The Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, '*provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement*', is included in the definition of 'maintain'. The Applicant maintains its position that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant as is common on electricity projects such as this. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. A failure to comply with a term of the DCO would be an

Reference	Question to	Question	Applicant's Response
		maintenance activities are to be transparently assessed or appropriately controlled. It maintains its argument the inclusion of the wording "in the opinion of the relevant planning authority" is necessary to ensure appropriate oversight in determining whether maintenance activities could give rise to materially new or materially different environmental effects. However, it recognises your concerns regarding potential delay arising from additional oversight and, on a without prejudice basis, suggests the inclusion of a deemed consent mechanism as an appropriately balance to that concern. It suggests such a mechanism would ensure decisions are made in a timely manner and no undue delay would be introduced to the delivery of the project. A suggestion of 20 working days has been provided as an example. In regard to Article 2 (Interpretation) and the definition of 'maintain' the applicant is asked for its considered response to the inclusion of such wording in the definition, together with the inclusion of the suggested deemed consent mechanism.	offence that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008. The Applicant notes the Council's proposed deemed consent mechanism but disagrees that it should be included. In addition, some maintenance works will be so minor in their nature that the inclusion of such a provision would be wholly disproportionate to the nature of the proposed maintenance works. Furthermore, it would not be appropriate to require the Applicant to seek consent from the relevant planning authority to carry out emergency repair works which also fall within the definition of 'maintain'. The Applicant's approach to maintenance has precedent in a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and the Applicant does not consider it necessary to depart from such precedent in this case.

Reference	Question to	Question	Applicant's Response
DCO 2.A3	The Applicant	Article 23 The ExA notes Suffolk CC's comments in its deadline 4 submission **[REP4-335]**, at table 9.9 where it states article 23 does not include provision for the treatment of human remains of archaeological context, even if they are older than 100 years. It does not grant a licence to excavate the human remains of archaeological research, or to retain those remains for archaeological and scientific analysis in a museum or archaeological archive (where required). As such they advise article 23 is an inappropriate mechanism for the treatment of human remains found through archaeological investigation. Provide your considered responds to this matter and update Article 23, if required.	The Applicant considers that Article 23 of **3.1 Draft Development Consent Order [Revision E]** should be retained. It is a precautionary administrative mechanism for the removal of human remains which does not govern, constrain, or conflict with archaeological practice during or after excavation (under Requirement 5 (archaeology) or otherwise). The Applicant offers a further targeted amendment to Article 23(13)(b) that removes any reasonable concern about the treatment of human remains identified during the course of the archaeological fieldwork prior to, during, and after their removal. The Suffolk County Council Archaeological Service (SCCAS) proposed amendment is therefore not appropriate or necessary and is not accepted. The National Grid (Bramford to Twinstead Reinforcement) Order 2024 (BTNO) comparison, including the Ministry of Justice (MoJ) burial licence point, supports retention of Article 23 on the facts of this project. The Applicant's response to DCO 1.A28 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** set out the detailed justification for retaining Article 23: its precautionary purpose, the consolidated legal mechanism it creates, the delivery risk of navigating multiple separate statutory regimes in its absence, and the safeguards it contains. That response also describes the offered amendment to Article 23(13) cross-referencing the Written Scheme of Investigation approved under Requirement 5 (Archaeology). This response addresses the specific points raised by SCCAS in REP4-335. SCCAS's central concern is that Article 23 is an inappropriate mechanism for the treatment of human remains identified through archaeological investigation, that following it would be detrimental to archaeological investigation, and that it does not permit the excavation, retention, and analysis of remains in a museum or archaeological archive, and that the requirement for an MoJ licence

Reference	Question to	Question	Applicant's Response
			under section 25 of the Burial Act 1857 should be reinstated for such historical human remains. Article 23 has been a standard form provision in many DCOs and, by its own terms, makes specific provision for remains interred more than 100 years ago, its paragraph (12) requiring the undertaker to apply to the Secretary of State for a direction as to their treatment before proceeding. There is no public benefit which an MoJ licence under the Burial Act 1857 secures but which Article 23, especially with the clarifications proposed below, does not. Nothing in Article 23 supersedes, displaces or conflicts with the obligation to carry out archaeological recording, sampling, analysis or archiving of any remains encountered under Requirement 5 and the relevant Written Scheme of Investigation. Both apply. To put this beyond any doubt, the Applicant has already offered an amendment to Article 23(13) requiring the undertaker in relation to removing and dealing with any remains interred more than 100 years ago to act '*in accordance with any applicable terms of a relevant written scheme of investigation approved under paragraph 5 (archaeology) of Schedule 3 (requirements), unless the Secretary of State directs otherwise*.' To the extent that there could be any doubt in this, the Applicant now offers a further amendment to Article 23(13)(b) to clarify that any application for a Secretary of State's direction would govern the treatment of remains interred more than 100 years ago throughout the entire process, from the point of discovery and during excavation, not only after removal (again in accordance with any applicable terms of a relevant written scheme of investigation). The amended Article 23(13) would read: '*(13) In the case of remains in relation to which paragraph (12) applies, the undertaker—* *(a) may remove the remains;*

Reference	Question to	Question	Applicant's Response
			(b) must apply for direction from the Secretary of State under paragraph (15) as to the treatment of the remains (including their treatment prior to, during and after removal) ~~their subsequent treatment~~; and *(c) must deal with the remains in such manner, and subject to such conditions, as the Secretary of State directs,* *in each case in accordance with any applicable terms of a relevant written scheme of investigation approved under paragraph 5 (archaeology) of Schedule 3 (requirements), unless the Secretary of State directs otherwise.'* SCCAS's proposed amendment to paragraph (17) re-engaging section 25 of the Burial Act 1857 is not necessary and is not accepted: it introduces drafting uncertainty through the undefined reference to 'best practice documents' and adds nothing that the amended Article 23(13) does not already provide with greater clarity. The case for retaining Article 23 as a generality remains compelling. In the absence of Article 23, the undertaker would be required to navigate multiple separate statutory regimes – including the Burial Act 1857, The Town and Country Planning (Churches, Places of Religious Worship and Burial Grounds) Regulations 1950, and sections 238 and 239 of the Town and Country Planning Act 1990 – each with its own procedural requirements. Article 23 replaces all of that with a single consolidated process in an appropriate manner (without conflicting with any required archaeological treatment of remains interred more than 100 years ago). For a project of critical national priority (CNP) the consolidation of these regimes into a single article is not a peripheral benefit: it is a material delivery protection which goes to the heart of the 'one-stop-shop' principle of the DCO regime. There is one known cremation burial within the Order Limits (NDHA 3293) and an inherent risk of further discoveries (of remains interred more

Reference	Question to	Question	Applicant's Response
			than 100 years ago or more recently) given the scale and linear nature of underground cabling works. The BTNO comparison supports retention, not removal: • SCCAS notes BTNO as a project operating under a scheme-wide MoJ burial licence under section 25 of the Burial Act 1857, suggesting this demonstrates a workable alternative. • However, BTNO has had to operate under an MoJ burial licence because it does not have a DCO article disapplying section 25, not because it chose that route in preference. • The BTNO ExA expressly recommended in its report (paragraphs 7.3.90 – 7.3.99) retaining the equivalent article to Article 23 because of known indicators of human remains within the Order Limits — specifically recorded cremated remains as well as a settlement with a cremation burial — and on that basis distinguished the BTNO project from earlier decisions (National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and National Grid (Richborough Connection Project) Development Consent Order 2017) where the equivalent article had been removed. The ExA's analysis, having engaged with those precedents, was that a project with known remains within the Order Limits warrants retention. • The Department for Energy Security and Net Zero subsequently removed the article from BTNO's draft DCO, the decision letter at paragraph 9.1 setting out the standard form reason for removal of this article from DCOs where it has been removed: '*Following consideration of the draft Order provided by the ExA, the Secretary of State has made the following modifications to the draft Order:* […] *removed the original article 22 (removal of human remains) from the draft Order, which sought to mandate that the Applicant remove and rebury or cremate any human remains from*

Reference	Question to	Question	Applicant's Response
			burial grounds within the Order limits. There are no known burial grounds within the Order limits so the Secretary of State considers this article to be unnecessary;' • This appears difficult to reconcile with the ExA's own factual assessment that there were known burial grounds (meaning it is not an appropriate precedent) and is, in any event, factually inapplicable to NTT, where NDHA 3293 is a formally recorded cremation burial within the Order Limits. Article 23 should therefore be retained. The two amendments to Article 23(13) offered in response to DCO 1.A28 and in this response, together ensure that: (i) Article 23 expressly does not override or displace archaeological obligations under Requirement 5 or the relevant Written Scheme of Investigation; and (ii) the Secretary of State's direction covers the treatment of remains throughout – prior to, during, and after removal – in accordance with the applicable written scheme of investigation. SCCAS's proposed amendment to paragraph (17) is not accepted: it is unnecessary given what the amended Article 23(13) already achieves, and introduces drafting uncertainty that the current article avoids. The BTNO comparison, properly understood, confirms the case for retention: the ExA for that project recommended keeping the equivalent article precisely because there were known burial remains within the Order Limits, which is the position at NTT. Article 23, as amended, is the appropriate consolidated mechanism for this project, and has precedent where the point has been appropriately grappled with, as in the Immingham Green Energy Terminal DCO.

Reference	Question to	Question	Applicant's Response
DCO 2.A4	Babergh and Mid Suffolk District Councils	Articles 48 During ISH2 (Day 1, Part 4) **[EV9-007]** Babergh and Mid Suffolk DCs indicated they have concerns in relation to Article 48 (Defence to proceedings in respect of statutory nuisance), but would be making those in writing at deadline 4. Please direct the ExA to where within your deadline 4 submissions you have raised these concerns or submit your concerns in response to this question.	This question is not directed at the Applicant.

6.3 Draft DCO – Schedules

Table 6.3 Draft DCO – Schedules

Reference	Question to	Question	Applicant's Response
DCO 2.S1	Anglian Water	Schedules 3 – General The ExA has noted the applicant's response to ExQ1 **[REP3-074]** at question 1.S4 where it notes Anglian Water's position where, if agreement on non-domestic water supply is not reached during the examination period, it considered a requirement for a Water Resources Assessment (WRA) should be included in the Draft DCO. In the applicant's response it stated a requirement is not necessary, giving the following reasons: • The provision of non-domestic water supply is regulated through separate statutory regimes and consenting processes, including Water Connections Agreements, which would be required prior to the supply of mains water; • The applicant Consents and Licences Required Under Other Legislation **[REP4-053]** already makes clear that applications for Water Connections Agreements required by the Water Industry Act 1991 would be submitted by the appointed Main Works Contractor(s) to Anglian Water, should	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		development consent be granted and prior to relevant works; and • Anglian Water's published Non-Domestic Water Requests Policy 26 applies independently of the DCO and, where requests exceed 20 m³/day for NSIPs, requires a WRA to be completed as part of the water supply approval process. The applicant points out that the inclusion of such a DCO requirement would duplicate existing regulatory processes and would not be necessary or proportionate. Furthermore, it advises it has submitted a draft WRA to Anglian Water for feedback, prior to the submission of all WRA's requested by Anglian Water for each temporary and permanent connection to proposed infrastructure where the WRA threshold is met. The applicant intends to further define the connection requirement and complete submission of all required WRAs by Deadline 6. The applicant considers the existing commitments in the outline CoCP **[REP3-025]** and seeking to secure Water Connections Agreements under other legislation provide sufficient and appropriate control. Would Anglia Water like to respond?	

Reference	Question to	Question	Applicant's Response
DCO 2.S2	The Applicant	Schedules 3, Requirement 1 (Interpretations) Essex CC at deadline 4 **[REP4-328]**, 'together with a number of other local authorities responded to ISH2 Action Point 16, which requests that local authorities comment on the applicants response to ExQ1 DCO 1.S5 regarding the discharging authority and the revised wording, including in relation to local government reform as set out in the Devolution and Community Empowerment Bill 2025. Whilst generally acknowledged as a positive step forward and broadly workable in principle, Essex CC does not consider the revised wording fully addresses the implications of local government reorganisation. In particular, it considers the drafting needs to be clearer and explicitly to cater for the transition to unitary authorities and the potential for functions to pass to multiple successor bodies. As a result it considers further refinement is required, including clearer "successor or successors" provisions and a mechanism to identify the appropriate authority by area. In the absence of such revisions it considers the current wording is not sufficiently robust.	Where local government reorganisation results in more than one successor authority across a current given area – as may well occur across Essex – 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 already optimally structured from a statutory drafting perspective to address the scenario Essex County Council describes. 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. The proposed addition of 'or successors' (plural) is unnecessary: 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 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. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the Office of the Parliamentary Counsel (2024) Drafting Guidance (19 March 2024, updated 4 April 2024)[7] for

[7] Office of the Parliamentary Counsel (2024) *Drafting Guidance* (19 March 2024, updated 4 April 2024) https://www.gov.uk/government/publications/drafting-bills-for-parliament/2024-03-19-drafting-guidance

Reference	Question to	Question	Applicant's Response
		Can the applicant review the current wording and provide a clear explanation of how it will be addressing these concerns within the DCO.	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. Therefore, the Applicant considers that the current drafting is both legally sufficient and preferable on that basis.
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	The Applicant is engaging with its Main Works Contractor(s) to develop a suitable complaints procedure and will also have regard to Local Planning Authority responses provided in response to ExA written question DCO 2.S3. The Applicant will subsequently update **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]** which will be submitted at Deadline 6.

Reference	Question to	Question	Applicant's Response
		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.	
DCO 2.S4	The applicant Suffolk Wildlife Trust	Schedules 3, Requirement 4 – (Construction Management Plans) 2 WaLOR Project - Embedded, standard and additional mitigation measures secured by the outline CoCP secured by Requirement 4. SWT in its deadline 4 submission **[REP4-373]** states the response in Document: 8.8.1 Applicant's Comments on Written Representations, that "The Applicant's Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects" is not sufficient. It seeks a commitment that the Main Works Contractor(s) engaging with the WaLOR project team during detailed design development, to avoid any potential for conflicts between the two	The Applicant can confirm that Section 9.9 of **7.4 Outline Landscape and Ecological Management Plan [Revision E]**, submitted at Deadline 5, has been updated to strengthen the wording around engagement between the Applicant's Main Works Contractor(s), UK Power Networks (UKPN) and the WaLOR project team during detailed design.

Reference	Question to	Question	Applicant's Response
		projects. It seeks the strengthening of the outline LEMP to ensure communication and coordination is guaranteed and that the detailed design and implementation of works by the applicant's Main Works Contractor(s) is compatible with the WaLOR project's planned river and floodplain habitat restoration works where the location of these overlaps with the Norwich to Tilbury project. The applicant is asked to amend the outline LEMP accordingly or explain, in full, why you consider such an amendment is not necessary. SWT are asked to provide a form of wording for potential inclusion within the outline LEMP, which adequately addresses your concern, in the absence of applicant's failure to adequately satisfy the ExA in this regard.	
DCO 2.S5	The applicant Suffolk Wildlife Trust	Schedules 3, Requirement 4 (Construction Management Plans) 3 The formation of an Ecology Working Group is referenced in the updated outline LEMP **[REP3-030]** that is secured by Requirement 4 SWT in its deadline 4 submission **[REP4-373]** highlights the role of an Ecology Working Group. It has previously mentioned an Ecology Advisory Group in its deadline 1 submission **[REP1-278]**. The deadline 4 submission states the role	The Applicant can confirm that the remit of the Ecology Working Group within **7.4 Outline Landscape and Ecological Management Plan [Revision E]**, submitted at Deadline 5, has been updated to broadly align with Suffolk Wildlife Trust suggested text within paragraph 2.3.1 of **[REP1-278]**.

Reference	Question to	Question	Applicant's Response
		of such a group must be strengthened within the DCO and it seeks to ensure such a group has a formal role in advising on the development and delivery of the LEMP, including any required adaptive management, as opposed to a group which would primarily receive updates from the applicant. Babergh and Mid Suffolk District Councils also make reference to the Tilbury Ecological Working Group and the need for the outline CoCP and outline LEMP to be updated. SWT advises it has provided a draft of a document to the applicant related to a proposed DCO requirement for an Ecology Working Group, as part of its submission documents and urge this to be used as a blueprint for the group. The ExA seeks clarification from SWT as to where within its submissions this document can be located. Is it referring to paragraph 2.3.1 of **[REP1-278]** or is referring to another document? The applicant is asked for its response to the document referred to by the SWT, along with a form of wording for inclusion within the draft DCO and/ or outline LEMP securing such a commitment to an Ecology Working Group or a detailed explanation as to why such a commitment is not required.	

Reference	Question to	Question	Applicant's Response
		SWT – Provide a form of wording for potential inclusion within the outline DCO and/ or the outline LEMP, which adequately addresses this matter, in the event the applicant fails to adequately satisfy the ExA in this regard.	
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	Noise and/or vibration monitoring is secured via commitment NV03 of **7.2 Outline Code of Construction Practice [Revision E]** as part of Section 61 applications for works which may cause exceedance of the relevant construction noise or vibration thresholds, through consultation with the relevant Local Planning Authority. Commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E]** has been updated at Deadline 5 to include provision of details of proposed noise and vibration monitoring to the relevant Local Planning Authority, together with provision of the detailed assessments. NV03 of **7.2 Outline Code of Construction Practice [Revision E]** has also been updated to clarify when, through consultation with the relevant Local Planning Authority, Section 61 applications will be undertaken. This relates to greater clarity on the definition of 'significant adverse effects' in commitment NV01 being included at Deadline 5. The assessment and management process, following the updates made at Deadline 5 are as follows: 1. The Main Works Contractor(s) will prepare detailed construction noise and vibration assessments based on their proposed methods, working locations, and works program and determine site-specific mitigation measures showing how 'significant adverse effects' will be avoided, and detail any proposed monitoring. (Commitments NV05, NV01,and NV04)

Reference	Question to	Question	Applicant's Response
		structured strategy regarding noise and vibration monitoring and complaints procedure.	2. The assessment will be shared with the relevant Local Planning Authority (Commitments NV05). 3. Where potential construction noise or vibration threshold exceedances are identified by the Main Works Contractor's assessment, they will liaise with the Local Planning Authority to discuss and agree their requirements for Section 61 applications. (Commitments NV03, NV01, and NV04) 4. Where requested by the relevant Local Planning Authority, the Main Works Contractor(s) will prepare a Section 61 application, detailing the assessment, the mitigation measures and temporal restrictions to be put in place in order to avoid 'significant adverse effects', and any monitoring proposals. (Commitments NV03 and NV01) 5. The Main Works Contractor(s) will update the Noise and Vibration Management Plan (NVMP) with the proposed mitigation and monitoring proposals. (Commitments NV05) The Applicant has committed to developing a complaints procedure in commitment GG37 of the updated Outline Code of Construction Practice at Deadline 5. This is further to commitment GG30 of **7.2 Outline Code of Construction Practice [Revision E]** which commits the contractor to keeping local communities informed of the works through active community liaison (including notification of 'noisy activities', providing a contact number through which members of the public can raise any concerns or complaints about the Project), and logging complaints in a complaint register, together with a record of the responses given and actions taken.
DCO 2.S7	The Applicant	Schedules 3, Requirement 4 (Construction Management Plan) 5 The ExA notes NV23 of the outline CoCP **[REP4-164]**, where in relation to the	Commitment NV23 clarifies that non-percussive piling methods are to be used as the default option and it is only where ground conditions reveal that percussive piling is unavoidable that percussive piling will be used. If percussive piling is unavoidably

Reference	Question to	Question	Applicant's Response
		construction of pylon foundations it advises non-percussive piling methods will be used, except where the results of ground investigations reveal that percussive piling is unavoidably required. Where percussive piling is to be used NV23 states a schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the local authorities prior to piling operations commencing. However, it does not provide any need for the consultation or agreement with the relevant local authority in regard to justifying its conclusions, nor ability for a local authority to seek amendments/ mitigations beyond any already proposed. How does the applicant proposed to resolve this concern?	required, this would constitute best practicable means (BPM), as per commitment NV01 of **7.2 Code of Construction Practice [Revision E]**. As a result, there would be nothing to agree with the LPA as the locations are identified on the basis of the ground investigations. In most, if not all cases, where percussive piling is unavoidably required, exceedance of the relevant noise and vibration level thresholds would not be expected as most pylons are not located close enough to receptors for this to be the case. In situations, albeit unlikely, where potential exceedance of the relevant noise or vibration level thresholds are predicted (i.e. where pylons requiring percussive piling are located close to receptors) these would be subject to the processes outlined in commitments NV01, NV03, and NV05 of **7.2 Code of Construction Practice [Revision E]** to avoid 'significant adverse effects' (noting that these have been updated at Deadline 5). The updated commitments clarify the process through which detailed construction noise and vibration assessments will be prepared by the contractor, and site-specific mitigation measures, including temporal restrictions, will be determined such that 'significant adverse effects' will be avoided. The assessments will be submitted to the Local Planning Authority. Where potential exceedances of the relevant noise or vibration level thresholds are identified, the contractor will liaise with the Local Planning Authority to discuss their requirements for Section 61 applications. The Section 61 applications would include the site-specific mitigation measures, including temporal restrictions to avoid 'significant adverse effects', justification of BPM (including, in the case of percussive piling, why alternative methods aren't feasible), as well as any noise and/or vibration monitoring requirements. This process is outlined in response to question DCO 2.S6.

Reference	Question to	Question	Applicant's Response
DCO 2.S8	The Applicant	Schedules 3, Requirement 4 (Construction Management Plan) 6 During ISH2, the ExA raised concerns regarding the level of adverse magnitude of impact along Primary Access Route (PAR) 30 - Bentley Road. It noted PAR has 16 Noise Sensitive Receptors (NSR) within 50 metres of the route, where the effect on these NSRs has the potential to be significant in the absence of mitigation, especially the property known as 'Jasmine Cottage'. Whilst there was a focus on Jasmine Cottage being the worst effected, it was clearly not the only property out of the 16 NSRs within 50 metres of the route where an adverse effect occurs. NV23 of the outline CoCP **[REP4-164]**, indicates bespoke noise mitigation strategy will be prepared for Jasmine Cottage, Bentley Road, Little Bentley prior to the start of works to mitigate construction noise levels to non-significant levels, as far as practicable, both inside the dwelling and in the garden areas. It indicates in principle this may include the offer of acoustically rated glazing and ventilation to achieve suitable indoor ambient noise levels (as suggested in BS 8233:2014), and the offer of acoustic fencing (which may be subject to planning permission) to achieve suitable external amenity levels (as BS	The Applicant is happy to clarify this point. The same principles of mitigating noise from construction traffic will apply at all 16 properties as per Jasmine Cottage. However, with the exception of Jasmine Cottage (where standard measures were found to be NOT feasible), standard mitigation measures may be feasible at some or all other receptors, subject to review. Where standard mitigation measures are feasible and efficacious at avoiding significant adverse effects at receptors, this would negate the need for bespoke noise mitigation strategies at those receptors. Where the review identifies that standard mitigation measures are not feasible or efficacious at avoiding significant adverse effects at receptors, bespoke mitigation strategies would be developed for those receptors. For example, should the Applicant use the proposed North Falls/Five Estuaries haul road off Bentley Road, this would reduce the number of properties affected (i.e. construction traffic would not pass the properties north of the proposed North Falls/Five Estuaries haul road along Bentley Road). Additionally, localised screening may serve to reduce effects, where feasible (noting that this option was explicitly ruled out at Jasmine Cottage as it is not feasible). As such, should standard mitigation measures be feasible to reduce effects at these properties, bespoke noise mitigation strategies would not be required. However, should standard mitigation not be feasible, then bespoke noise mitigation strategies would be required, considering the same principles as Jasmine Cottage. With regard to vibration from construction traffic on the public highway, this was scoped out of the Environmental Statement, as per ID 3.12.2 of **6.20 Scoping Opinion [APP-297]** on the basis that vibration from traffic is caused by irregularities in the road surface (e.g. potholes) and it is assumed that the road is well maintained. Vibration from highway works close to properties will

Reference	Question to	Question	Applicant's Response
		8233:2014). However, the outline CoCP makes no reference to the other NSRs, mentioned above, other than to say a "Further review of construction traffic noise on other NSRs along Bentley Road will be undertaken prior to the start of works, and appropriate mitigation may be implemented to reduce construction traffic noise levels as far as practicable. This may include the offer of sound insulation and alternate ventilation via bespoke noise mitigation strategies if other mitigation options (such as screening) are not feasible for avoiding significant adverse effects." The ExA is concerned this mitigation commitment, as set out in the outline CoCP **[REP4-164]** does not refer to vibration effects or related mitigation and it does not go far enough, in the ExA's view, in regard to the other NSRs along PAR30, where the ES Chapter 14 - Noise and Vibration (Final Issue A) **[APP-256]** states "major significant adverse effects from construction traffic noise would still be expected on Bentley Road. Review and advise how you will be addressing these concerns.	be controlled by commitments NV01, NV04, and NV05 of **7.2 Outline Code of Construction Practice [Revision E]** (noting the updates to these commitments at Deadline 5).
DCO 2.S9	The Applicant	Schedules 3, Requirement 5 (Archaeology) Essex CC at deadline 4 **[REP4-328]**, together with a number of other County	Following the issue of its discussion draft of Requirement 5 at Deadline 3 (AS-090), the Applicant has updated Requirement 5 in **3.1 Draft Development Consent Order [Revision E]** to:

Reference	Question to	Question	Applicant's Response
		and Local Authorities continue to raise concern in regard to requirement 5 (Archaeology). In essence they consider the current drafting of the requirement to be insufficient to ensure effective archaeological control, as it relies on outline documents (the outline AMS and outline WSI), which it states remain unagreed and inadequate at this time to function as control documents. In the absence of an agreed and robust strategy, it considers intrusive pre-commencement works should not proceed until detailed, site-specific WSIs have been approved, reflecting a precautionary approach to safeguarding archaeological assets. The ExA notes that responding local authorities indicate this position is informed by experience on the Bramford to Twinstead project, where failure to secure agreement pre-consent resulted in delays. Can the applicant explain clearly how it will be addressing this matter within the draft DCO to address these concerns, especially those concerning ensuring effective archaeological control is provided and appropriately secured within the DCO.	• Provide for the approval of written scheme of investigation (WSI) for evaluation works • Clarify for consistency with the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]** (OAMS-OWSI) that a preservation in situ management plan would, if relevant, form part of a detailed written scheme of investigation as opposed to being separate • Provide that evaluation works must be carried out in accordance with the WSI referred to in (a) above • Set out the process for post-excavation assessment, approval of an archaeological updated project design, post-excavation analysis, publication and archiving. The Applicant has retained its original wording regarding pre-commencement operations being carried out in accordance with the OAMS-OWSI because it remains concerned that a blanket prohibition on site preparation works would prevent anything being done on site that would, even to the smallest degree, break the surface of the ground. This could include activities as *de minimis* as the erection of a fence post. Whilst the Applicant recognises the need to ensure that buried archaeology is suitably preserved, its position is that in the context of a project of CNP, a blanket prohibition is disproportionate and unnecessary. The Applicant considers that the measures set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**, together with its identification of priority areas and the extensive trial trenching that it has already carried out to date, would ensure the adequate protection of buried archaeology during pre-commencement works. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]** has been updated following two rounds of consultation with Historic

Reference	Question to	Question	Applicant's Response
			England and the archaeological advisors to the Local Planning Authorities since submission of the document to the Planning Inspectorate with the DCO Application for the Project. The Applicant considers that this document provides suitable processes, measures and controls to ensure the appropriate completion of evaluation and undertaking of mitigation for the Project, in line with the Applicant's responsibilities in NPS EN-1. The provisions of the OAMS-OWSI regarding unexpected finds during construction also apply to the pre-commencement works.
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	The Applicant has responded on the topic of construction hours across submissions to date including: **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (paras 3.18.17-3.18.35) and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (DCO 1.S10).Given the ExA request for modelling, the Applicant feels it would be beneficial to add some context to how projects like this are modelled and what assumptions can and cannot be made from the results. Modelling assumptions The Applicant has undertaken a high-level modelling exercise for the scenarios requested by the Examining Authority. The results are as follows: a) Removal of just Sundays – energisation date delayed by approximately 9.5 weeks b) Removal of just bank and other public holidays – no impact c) Removal of Sundays and bank and other public holidays – energisation date delayed by approximately 9.5 weeks. These results must be viewed with appropriate caution. In understanding the results of scenario testing, it is also important to explain how construction programme modelling operates in practice. Industry-recognised programme tools such as Primavera P6 are designed to identify the critical path, which is

Reference	Question to	Question	Applicant's Response
		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. 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	the sequence of activities that directly determines the overall completion date of the Project. If an activity on this path is delayed, the end date moves; if an activity sits outside the critical path, a degree of delay can be absorbed without affecting the final completion date. At the pre-consent stage, the final construction working hours to be approved through the DCO are not yet fixed. As a result, it is not appropriate to embed extended hours or weekend working assumptions into the programme. Hours over and above the standard as modelled are typically applied for as programme levers given that it is widely understood in the construction industry that time on site is not 100% productive. This is supported by a number of studies[8,9,10] that put direct productive work (sometimes referred to as 'tool time') at between 30%-60% of total site time. A proportion of each working day is necessarily taken up by activities such as mobilisation, safety briefings, inspections and travel between locations meaning that effective productive time is always less than the total hours worked. These do not appear as separate activities in a construction programme but become accounted for as part of productivity assumptions. The programme is therefore developed by working back from the required delivery date, taking into account typical levels of construction productivity rather than assuming that all available hours are fully productive. This approach allows the Applicant to understand, as far as reasonably possible at this stage, factoring in productivity assumptions, the level of working time that will be required to deliver the Project. The consideration of working hours required also recognises that working hours cannot always

[8] Construction Productivity Taskforce (2025) *Improving Construction Productivity: Practical Insights from Pilot Site Studies*

[9] Royal Institution of Chartered Surveyors (RICS) (2026) *Construction Productivity Report 2026*

[10] Office for National Statistics (2021) *Productivity in the construction industry, UK*

Reference	Question to	Question	Applicant's Response
		hours specified, start and close down activities and the operations that may take place outside of those core working hours.	be minimised through the addition of labour alone to enable the same construction duration but shorter working hours. Key elements of the Project rely on finite specialist resources and sequential construction activities which cannot be readily parallelised. Consequently, programme delivery is dependent not only on resource levels but on the ability to utilise available working time. Taking account of the above for the purposes of modelling, contractor programmes are typically structured around standard calendar assumptions (five-day working week, 09:00–17:00), with detailed crew shift patterns not explicitly modelled. This provides a consistent and conservative baseline to provide a neutral and auditable starting point from which the overall sequencing of works, dependencies and critical path can be established. This allows the Applicant to understand the fundamental deliverability of the Project. The Applicant takes all of these matters into account with the proposed core working hours in **3.1 Draft Development Consent Order [Revision E]**. The current core hours provide the Applicant with 4,060 working hours per year, providing 49% additional capacity above baseline on the standard modelling assumption of 2,080 hours per year reflecting the industry statistics on direct productive work. **Flexibility requirements informing Sunday and public holiday working** The Applicant has explained above how the programme modelling of a project like this works and as a result why reduced working hours would not be sufficient to deliver this Project by the end of 2030. To expand on how working hours applied for over and above the standard as modelled are typically applied for as programme levers the Applicant would like to explain that

Reference	Question to	Question	Applicant's Response
			flexibility provided by the proposed working hours proposed is typically required for two main reasons. Firstly, for some activities, Sunday and public holiday working is not merely a contingency mechanism but forms part of the practical deployment model for specialist labour, plant and constrained operations. The Project comprises overhead line works, substation works and cable works along a long, linear and geographically dispersed route. A number of activities are undertaken by finite specialist crews (often from abroad) with compressed mobilisation patterns including steelwork erection, conductor stringing, heavy lifts, cable pulling, jointing and termination, Original Equipment Manufacturer installation and outage-dependent works. In some cases those specialist teams are mobilised for intensive rotations, including patterns such as 12 days working and two days off in every 14 days, and it is therefore unrealistic to characterise all Sunday or public holiday working as exceptional or atypical. Once such teams and plant are mobilised, the ability to continue working through available weekends is a crucial part of efficient delivery. Secondly, and separately, Sunday and public holiday working provides an important programme and resilience recovery mechanism. Large electricity transmission projects are routinely affected by matters such as adverse weather, wind restriction affecting crane operations, complex archaeology mitigation, delivery delays, plant breakdown, supply chain issues, access constraints, traffic management restrictions, third-party interfaces and outage windows. Without recovery windows, disruption accumulates more readily into critical path delay, and the programme becomes materially less robust in protecting the end-2030 energisation milestone.

Reference	Question to	Question	Applicant's Response
			In the context of the Project's need case, the Project is identified as CNP infrastructure. The NESO CP2030 report Annex 2[11] section 2.4 table 1 records that delay beyond end-2030 risks ongoing electricity system constraint costs of approximately £7 million per day, which equates to approximately £49 million per week. In that context, removing flexibility in a way that materially increases the risk of delay would not be a neutral change. In practical terms, the removal of Sundays and public holidays represents a 14.4% reduction in the total available core working hours that are set out within Requirement 7 in Schedule 3 of **3.1 Draft Development Consent Order [Revision E]** across a calendar year. The Applicant notes that all other consented electricity transmission Nationally Significant Infrastructure Projects have been granted seven-day working. While the precise approach varies between projects, such provision is typically subject to controls on the type of activity undertaken, such as restrictions on piling or HGV movements, or limits on the frequency of consecutive weekend working. The evidence from comparable schemes therefore demonstrates that the use of weekend working is an established feature of electricity transmission projects, and that the key consideration is the application of proportionate controls, rather than the imposition of a blanket restriction. The Applicant has already embedded targeted controls within **3.1 Draft Development Consent Order [Revision E]** in respect of those construction activities most likely to give rise to higher levels of disturbance, ensuring that potential impacts on local communities are appropriately managed.

[11] National Energy System Operator (NESO) (2024), *Clean Power 2030: Annex 2 – Networks, connections and network access analysis*

Reference	Question to	Question	Applicant's Response
			In particular, **3.1 Draft Development Consent Order [Revision E]** restricts the timing of percussive piling, such that this activity may only take place between 07:00 and 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays, unless otherwise agreed by the relevant planning authority. Percussive piling is recognised as one of the construction activities with greater potential to give rise to noise and vibration effects, and its restriction reflects a proportionate mitigation approach. Similarly, the Draft DCO applies controls to HGV deliveries, limiting these to core daytime hours (07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays), unless otherwise agreed by the relevant highway authority. This ensures that vehicle movements associated with the Project are managed in a way which reduces potential effects on local amenity, highway safety and traffic conditions, particularly during more sensitive periods. These provisions demonstrate that the Applicant's approach is not to enable unrestricted working, but to differentiate between types of activity, applying tighter controls where impacts are likely to be greater, whilst retaining flexibility for the delivery of the Project as a whole. This targeted and proportionate framework allows the Project to be constructed efficiently, while ensuring that those activities with the greatest potential to affect local receptors are appropriately constrained. The Applicant notes that the Project is identified as being of critical national priority, which further distinguishes it from earlier electricity transmission DCOs. In that context, there is an additional and urgent need to ensure that the Project can be delivered within the required timeframe to support national energy objectives. While comparable schemes have required extended working hours due to their linear nature, the need for flexibility on this Project is reinforced by the consequences of delay, including wider system impacts and constraint costs which

Reference	Question to	Question	Applicant's Response
			are passed to the consumer and are directly associated with not achieving the end-2030 delivery milestone. Accordingly, while the proposed working hours are consistent with established practice across comparable electricity transmission DCOs, the Applicant considers that the Project's CNP status provides additional justification for retaining sufficient flexibility within those hours. This ensures that the Project can be delivered efficiently and within the required timescales, while maintaining appropriate controls to manage impacts on local communities.
DCO 2.S11	All local authorities	Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows) 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. The applicant responded **[REP3-074]** "…The submission of an Aboricultural 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	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		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." 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.	
DCO 2.S12	All local authorities The applicant	Schedule 3 – Requirements 13 (Decommissioning) 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." The ExA would seek clarification from Braintree DC or any local authority: i) how the relevant planning authority would determine equipment/ infrastructure has become obsolete; ii) whether the removal of such equipment/ infrastructure should be within	The Applicant acknowledges the concerns raised regarding the retention of infrastructure that is no longer required for operational purposes. As the licensed electricity transmission owner, National Grid has statutory duties to develop, maintain and operate an efficient, coordinated and economical transmission system. Decisions regarding the continued retention, replacement or removal of assets are therefore subject to ongoing technical, operational and regulatory review throughout the life of the network. Once operational, the Project is managed under National Grid's statutory and licence obligations, including funding and regulatory oversight where decommissioning or replacement is required. In response to the Examining Authority's specific questions: i) Determination of obsolescence

Reference	Question to	Question	Applicant's Response
		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. The ExA also asks the applicant to comment on this matter.	The Applicant does not consider that the relevant planning authority would be best placed to determine whether transmission equipment or infrastructure has become obsolete. Such determinations require detailed technical and network planning assessments taking account of system resilience, backup functionality, maintenance regimes and future network needs. Infrastructure that is not in active use may still serve an operational, contingency or strategic function. Operational and network planning assessments are intrinsically linked to the undertaker's statutory duties and licence obligations. ii) Fixed timeframe for removal The Applicant considers that a specified or fixed period for the removal of infrastructure would be wholly inappropriate. The timing of any decommissioning would depend on the particular circumstances of the asset, including operational, safety, environmental, engineering and network considerations. A fixed timeframe could unnecessarily constrain the undertaker's ability to manage the transmission network efficiently and safely and could lead to unintended adverse consequences. iii) Requirement for a decommissioning scheme Where infrastructure is formally decommissioned and its removal is considered appropriate, Requirement 13 (decommissioning) will be engaged and decommissioning activities would need to be undertaken in accordance with the relevant statutory, regulatory and environmental requirements applicable at the time. However, it is not necessary, nor appropriate for the DCO to extend control over the lifecycle management of operational transmission assets, which is governed through a separate, well-established statutory and regulatory framework.

Reference	Question to	Question	Applicant's Response
			For these reasons, the Applicant does not consider that additional controls within **3.1 Draft Development Consent Order [Revision E]** are either necessary or appropriate.
DCO 2.S13	All local authorities	Schedule 4 – (Discharge of Requirements) Schedule 4(3) - Fees 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: 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.	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		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.	
DCO 2.S14	The Applicant	Schedule 16 - Protective Provisions 1 The ExA notes the applicant's response to ExQ1 GEN 1.11 **[REP3-074]**, as well as the representation made by Hornsea Project 3 (UK) Ltd (HP3) **[REP4-368]**, especially paragraphs 1.7 to 1.10, which is seeking bespoke protective provisions. The ExA would ask for clarification to your response stating 'no overlap' is expected with the Hornsea Three project in the light of HP3s response. Additionally, having reviewed the applicant's deadline 4 submission 'Statutory Undertaker Tracker (Final Issue B)' (Document 8.7) and the draft DCO **[REP4-305]**, the ExA found no reference to protective provisions related to the Hornsea Three Offshore Wind Farm DCO, or the land referred to, where HP3 state it has an option agreement with the applicant (National Grid Electricity Transmission PLC) or adjacent land, where HP3 advise it has entered into	The Applicant is currently in discussions with Hornsea Three and their legal advisors to fully understand the nature of the interaction between the projects. The Applicant's current understanding is that Hornsea Three has completed the installation of the onshore grid connection cables which are now awaiting commissioning. On that basis, the Applicant is not aware that there will be an overlap in the construction of Hornsea Three and the construction of Norwich to Tilbury. However, it is correct that there will be an interface between the projects and the current discussions between the parties envisage there being a side agreement put in place to provide relevant protections to Hornsea Three's apparatus during construction of Norwich to Tilbury and land rights (option). Hornsea Three has been added to the Statutory Undertaker Tracker for Deadline 5 to provide an update on the status of these discussions.

Reference	Question to	Question	Applicant's Response
		option agreements with third party land owners. The applicant is asked to clarify its intentions with regard to resolving the concerns raised by HP3, including how this will be addressed in the draft DCO and a timescale for resolving this matter.	
DCO 2.S15	The applicant Arqiva Ltd	Schedule 16 - Protective Provisions 2 The ExA notes the representation made by Arqiva Ltd **[REP4-374]** and asks how it intends to address the objection being raised, which in part appears to arise out of frustration with communication between the relevant parties as highlighted, in part, by the penultimate paragraph of its submission. Further to Schedule 16, Part 2 of the draft DCO, the ExA asks both the applicant and Arqiva Ltd whether that protective provision addresses the concerns being raised or whether bespoke protective provisions are being sought/ discussed between the relevant parties. In the event of the bespoke protective provisions being sought can the applicant provide a timescale for resolving this matter.	The Applicant is looking into these interfaces to identify solutions within the limits of deviation or other methods of mitigation. The Applicant has reached out to Arqiva Limited to further discuss and understand the identified interactions and proposed mitigations, as well as agree next steps to resolving any outstanding matters. A meeting has been arranged for week commencing 8 June between both parties. This engagement will be captured in a Statement of Common Ground to be submitted within the examination window. Arqiva Ltd has not yet requested bespoke protective provisions, however, the Applicant stands ready to enter into such negotiations or put in place a side agreement should Arqiva Ltd indicate this is necessary, notwithstanding the protective provisions already included in the Order.
DCO 2.S16	Braintree District Council	Schedule 19 - Certified Documents The applicant responded at ExQ1 **[REP3-074]** at DCO 1.S25 to Braintree DC's request to include supplemental environmental statements to the list of	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		certified documents where it advises '…the definition of environmental statement in Article 2 (interpretation) includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the requirements…' As such the applicant's position is that the proposed change is not necessary. Braintree DC is asked to respond and advise whether it is now satisfied with regard to this matter.	

7. Historic environment

Table 7.1 Historic environment

Reference	Question to	Question	Applicant's Response
HE 2.1	The applicant	Methodology The applicant's answer to ExQ1 HE1.2 [REP3-074] contains details of the assessment of conservation areas potentially affected by the proposed development. The ExA notes the response but requests further information over the categorisation of the conservation areas: a) It appears there is only one 'high' value conservation area, West Tilbury. What differentiates this conservation area in value terms from the other conservation areas along the proposed route, all of which are designated 'medium' value? Provide more evidence of reasoning or workings. b) What professional advice or guidance applies to such categorisation?	a) The Applicant has assessed West Tilbury Conservation Area (CA28) as 'high value' based on its exceptional evidential, historical and archaeological significance (refer to **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**), which distinguishes it from other conservation areas along the route that are assessed as 'medium' value. In particular, West Tilbury Conservation Area is characterised by a combination of: – A demonstrable continuity of settlement from prehistoric/Saxon through to medieval and later periods, evidenced by cropmarks, Roman finds, and the likely location of a manor recorded in Domesday – The presence of a Scheduled Monument 'Earthworks near church, West Tilbury' (1002199) indicating nationally important archaeological remains and reinforcing its evidential value – The intact medieval settlement pattern, including a fossilised street layout, a central village green with historic associations (including the 14th-century market and fair), and the well-preserved medieval open field system 'Great Common Field', which survives as a complete example – A notable concentration of designated assets, including 13 listed buildings, two of which are grade II*, alongside non-designated assets contributing positively to character

Reference	Question to	Question	Applicant's Response
			– An historical association of national significance, including links to Queen Elizabeth I and the Spanish Armada – A setting that makes a considerable contribution to its value, with clear visual and functional relationships between heritage assets and the surrounding agricultural landscape, which remains largely legible and intact. Taken together, these characteristics demonstrate a higher level of evidential, historical and associative value, as well as a rare degree of survival of associated historic landscape and settlement form, which elevates West Tilbury Conservation Area above other conservation areas assessed along the route. Other conservation areas, while important, do not exhibit this same combination of nationally significant archaeological interest, completeness of medieval landscape, and time-depth evidence, and are therefore appropriately assessed as 'medium' value. b) The categorisation of conservation areas has been undertaken in accordance with established professional guidance listed in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** (pages 6-7). The Applicant highlights that the conservation area's value has been assigned following the framework described in **6.19 Scoping Report [APP-288 to APP-296]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, drawing on relevant Historic Environment Record information and professional judgement. We are confident in the approach taken, given the available evidence and the guidance applied. The Applicant also adds that the assessment of value has been agreed with Historic England (**5.9.14 Draft Statement of Common Ground - Historic England [REP4-083])** and the historic environment advisors to the Local Planning Authority.

Reference	Question to	Question	Applicant's Response
HE 2.2	The applicant	Mitigation hierarchy – Great and Little Waltham The applicant's reasoning towards the mitigation hierarchy is noted in various written and oral submissions. The proposed line between Great and Little Waltham north of the river Chelmer is currently proposed to be constructed with low height pylons. The answer to ExQ1 HE1.4 [REP3-074] states that adverse effects were reduced to a level considered acceptable by the introduction of these pylon types. The applicant is asked to provide justification for the reasoning for not selecting T pylons along this section of the route – what level of adverse effects required or justified the use of low height pylons but not T pylons?	The Applicant has noted that the application of the mitigation hierarchy is done sequentially with the effects at a lower level on the hierarchy having to be considered unacceptable in order to progress to consider the next level up the hierarchy. This is discussed further in response to ExQ2 LV 2.14. In this case, because the effects from low height lattice pylons are not considered unacceptable, there is no progression to the consideration of T-pylons which are higher up the mitigation hierarchy. The judgement was most focussed on the assessment of heritage effects. These were neither at the upper end of less than substantial harm nor constituted substantial harm in National Policy Statement EN-1 (2024) terms and were therefore not considered to be unacceptable (therefore were considered acceptable). In addition, although T-pylons are shorter than standard height lattice pylons, because of the form of T-pylons they can appear more visually intrusive in rural settings due to their colour and solid structure. Therefore, the use of T-pylons in this location would potentially increase harm to heritage assets.
HE 2.3	The applicant	Grouping of heritage assets The applicant's answer to ExQ1 HE1.8 [REP3-074] confirms the approach taken to harm caused to heritage assets and in particular notes the approach taken where the significance of individual assets is informed by its relationship with other assets, using the example of the Roydon Hall complex. Comments regarding the 'density' of heritage assets in the applicant's answers to the Historic Environment	a) The Applicant confirms that the assessment has considered relationships between heritage assets where these are clearly evidenced and contribute to their significance, including functional, historical or designed associations (for example, the Roydon Hall complex as set out in the comment). These relationships are captured within the assessment of significance and setting on an asset-by-asset basis, rather than through the definition of separate or wider groupings. However, the Applicant does not consider it appropriate or proportionate to define wider settlement-scale groupings of heritage assets where no clear and demonstrable heritage relationship exists between them. While assets within locations such as Ardleigh, Ford Street and Great Waltham may be in relative proximity, this

Reference	Question to	Question	Applicant's Response
		Rule 17 letter points 1 and 4 are also noted [REP4-318]. The applicant is asked: a) Has any consideration been taken of wider groupings – for instance groups of heritage assets within Ardleigh, Ford Street or Great Waltham? b) Could relationships between assets, whether functional such as the Vicarage and Church in Ardleigh, or locational through shared ages and architectural styles specific to the locality raise the importance of the whole rather above the individual level? If so, how might this be affected by the proposed development?	does not in itself establish a coherent heritage grouping. In many cases, assets within these areas differ in date, function, architectural form and historical development, and do not form a unified or interdependent group whose significance is meaningfully derived from collective association. This approach is consistent with guidance in The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England, 2017), Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2 (Historic England, 2015) and Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12 (Historic England, 2019). For instance, as assessed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** (page 663), within Fordstreet Conservation Area (CA9), assets differ substantially in date, function and character, comprising early medieval farmsteads to the north, Tudor and Georgian residential development to the south, and later interventions including modern infrastructure and a nearby industrial area. These components do not form a unified or interdependent group, but rather reflect a layered and evolving settlement pattern, where significance is derived from individual assets and their immediate relationships rather than a single overarching grouping. The Applicant therefore considers that assessing assets individually while recognising relevant interrelationships where justified is proportionate, consistent with established guidance, and sufficient to ensure that group value has been appropriately taken into account where it meaningfully arises. b) The Applicant agrees that relationships between heritage assets may contribute to their significance where, for example, there is a clear functional, historical, architectural or designed association,

Reference	Question to	Question	Applicant's Response
			such as the relationship between a church and its vicarage, or within areas of coherent historic development. These relationships have been fully taken into account within the assessment through consideration of setting, including intervisibility, spatial relationships and shared historic context, in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and reflected in the assessment of setting within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. This approach is consistent with the guidance listed in response to part (a) above. However, the Applicant does not consider that such relationships elevate the overall heritage value of a group beyond that of the individual assets. The contribution that assets make to one another is understood as part of their setting, and setting is one component of an asset's overall significance, which has already been considered in the assessment. As such, the presence of functional or locational relationships does not result in an additional uplift in value at a wider group level, nor does it raise the importance of a collection of assets above the sum of their individual significance. Importantly, while assets may be experienced in relation to one another, they are not interdependent in a way that would result in a material increase in inherent value at a group level. If one element of such a relationship were altered or removed, for example if a vicarage were no longer functionally connected to a church, or if physical or visual connections between them were diminished, the strength of that relationship and aspects of their shared setting may be reduced. However, each asset would nonetheless retain its own heritage interest and significance, derived from its architectural, historical and evidential value. This demonstrates that, while relationships may contribute to the way in which significance is experienced, they do not necessarily create a

Reference	Question to	Question	Applicant's Response
			group whose value exceeds that of the individual components. In this respect, the presence of a higher-value asset (such as a Grade I listed church) does not make a Grade II vicarage more valuable. Rather, the relationship contributes to the significance of each asset through its setting, and this contribution has already been captured within the assessment. This position is reflected in the assessment of settlements such as Ardleigh (CA26) and Great Waltham (CA55), where, although localised relationships exist (for example around historic cores or between specific asset types), these areas comprise a range of building periods, functions and character areas which reflect their incremental development over time. As such, they do not form single coherent or interdependent groups whose significance exceeds that of the individual assets, but rather a collection of related yet distinct components, each deriving significance from their own attributes and relationships, as set out in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** (pages 515–517; 835–836). The Applicant therefore considers that any effects of the Project on relationships between assets would be experienced through changes to setting, already assessed on an asset-by-asset basis, and would not give rise to additional effects at a wider group level.
HE 2.4	The applicant	Assessments across multiple assets The applicant's answer to point 3 of Historic Environment Rule 17 letter [REP4-318] concerns the setting of heritage assets. Leaving aside the matter of construction, the ExA questions your response in relation to the operation and management phase.	The Applicant acknowledges the ExA's request for further information regarding the consideration of intangible aspects of setting, including historic relationships between places, tranquility, remoteness, and the potential for changes to the wider character of historic landscapes during the operation (and maintenance) phase of the Project. The Applicant confirms that these intangible characteristics of setting have been considered as part of the assessment where

Reference	Question to	Question	Applicant's Response
		While visibility is an important way in which one will experience an asset, intangible elements of setting, which include historic relationships between places and harm that is compounded over a wider historic townscape or landscape area, also require proper assessment. This is referred to in 'The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (Historic England, 2017) (GPIP 3) in several instances, such as the mention of "qualitative issues such as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community". The table on p.13 of GPIP 3 also notes possible effects of development as including the change to general character (industrialising) of a setting. While it is acknowledged that these elements will not be relevant to every assessment, there are groups of assets that would benefit from a deeper understanding of historic interconnections, tranquillity and remoteness and industrialisation of the general character. The applicant is asked to provide further detail on how these have been	relevant and proportionate. The assessment of setting has not been limited to visual considerations, but has included the wider historic, functional and environmental context of heritage assets. As set out in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, the assessment considers the broader setting of heritage assets, including their relationships with surrounding landscapes and associated land uses. For instance, in the assessment of farmsteads and rural buildings, their wider agricultural setting, including openness, land use and historic functional relationships with the surrounding farmland, have been taken into account. The Applicant confirms that the assessment methodology, including the approach to setting, has been developed in accordance with established guidance (including GPIP3) and has been discussed and agreed with Historic England and Local Planning Authorities, as set out in **5.9.14 Draft Statement of Common Ground - Historic England [REP4-083]**. Historic England and the Local Planning Authorities are broadly in agreement with the application of the methodology, with disagreement with assessment conclusions for a small proportion of the heritage assets assessed as set out in the relevant Statements of Common Ground. The Applicant therefore maintains that the methodology is robust and proportionate and gives appropriate weight to both tangible and less tangible aspects of setting, including where these contribute to the significance of heritage assets. The assessment of setting is informed by a combination of site visits, baseline data, and supporting visualisations (used as an aid rather than a requirement), with viewpoints refined during the assessment process (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**). The assessment of impacts took the setting assessment into account and considered whether and how the Project would alter the setting of relevant heritage assets.

Reference	Question to	Question	Applicant's Response
		assessed and how this additional assessment might affect the concluded level of harm.	Having regards to these factors, the Applicant considers that the assessment has already captured both visual and non-visual aspect of setting, including wider landscape context and character. The inclusion of these considerations has therefore been taken into account in the assessment of harm to heritage assets and therefore any additional assessment is not required to determine the impact of the Project on heritage assets.
HE 2.5	The applicant	Vibration The applicant's answer to points 5 and 6 of the Historic Environment Rule 17 letter [REP4-318] provides the regulatory background in terms of British Standards and vibration effects. While noting that BS 5228-2 specifies that buildings of historical value should not be assumed to be more sensitive, vibration effects in this instance have been raised by various IPs, including local councils. Given this, should Commitment H07 in the outline code of construction practice [REP4-164] be widened to specifically include the 33 listed buildings deemed to be subject to a greater than negligible magnitude of impact from vibration without mitigation?	The information provided in response to point 5 of **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]** also sets out that the information provided in response to ExQ1 HE 1.11 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, for all listed buildings included within the vibration assessment, relate to the human response to vibration not the structural impact. Humans are more sensitive to vibration than structures and the impact magnitude thresholds are an order of magnitude lower than those for even a non-zero risk of structural damage. While some listed buildings have been identified as experiencing a greater than negligible magnitude of impact without mitigation, these levels remain well below recognised thresholds at which even cosmetic damage to buildings could occur. Accordingly, there is no evidence to suggest that any of the listed buildings, apart from Little Bromley War Memorial (1493299) as set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, would be at risk of vibration-related damage even without mitigation. The measures secured through **7.2 Outline Code of Construction Practice [Revision E]**, including commitments NV01, NV02, NV03 and NV05 (and other associated noise and vibration commitments), are therefore considered appropriate to ensure that the Main Works Contractor(s) will identify and employ best practicable means (BPM) to reduce the effects of construction noise and vibration, undertake detailed noise and vibration assessments, and identify and set out control measures specifically regarding potential damage from construction

Reference	Question to	Question	Applicant's Response
			vibration. These commitments mean that the use of commitments NV04 and H07 (requiring pre- and post-work condition surveys to be undertaken, including the rectification of any damage (cosmetic or otherwise) deemed to be caused by the works) are unlikely to need to be widely used as the commitments are designed to avoid vibration effects in the first instance, although they include provisions to address any damage in the highly unlikely event that it occurs. On this basis, the Applicant does not consider it necessary to widen commitment H07 to include the identified buildings.
HE 2.6	The applicant	Limits of Deviation The applicant's answer to point 7 of the Historic Environment Rule 17 letter [REP4-318] notes that the commitment to move Pylon TB245 north to reduce heritage effects on Wyfields Farmhouse is "aspirational". Commitment GG34 in the outline code of construction practice [REP4-164] uses the word "seek". Is the commitment actually a commitment or just an aspiration and what does 'seek' mean in practice?	The assessment for the Project has considered the reasonable worst-case and concluded a moderate adverse effect to Wyfields Farmhouse (1337057) during construction and operation (and maintenance), which would be significant in EIA terms (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and mid less than substantial harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). As the assessment concludes less than substantial harm and the detailed design for the Project is not yet complete it is not possible at this time to make a more definite commitment. The inclusion of this commitment and use of the word 'seek' ensures that as the detailed design is developed, if it is possible, pylon TB245 will be moved further from the listed building. This approach allows the need to balance various considerations including (but not limited to) engineering feasibility, ground conditions and proportionality of costs, against the potential to reduce the impact on this listed building further. Initial assessments indicate this pylon could be moved northwards by around 50 m with marginal change to the next pylon to the south. Such a change would be welcomed by the landowner and is in the process of being finalised. Commitment GG34 and other similar commitments relating to siting considerations in **7.2 Outline Code of Construction Practice [Revision E]** establish a starting point for detailed design and

Reference	Question to	Question	Applicant's Response
			reflect the Applicant's response to the Environmental Impact Assessment and consideration of stakeholder feedback. These commitments are being communicated to relevant landowners and form the basis upon which design refinement is being progressed. Whilst the Applicant has every intention to make these changes, they remain within Limits of Deviation and subject to detailed design and ground investigations. The term 'seek' reflects the need for further on-site engagement with landowners and technical validation to confirm the final micro-sited position.
HE 2.7	The applicant	Babergh and Mid Suffolk In its response to your response to ExQ1 HE1.10, Babergh and Mid Suffolk [REP4-320] notes that in Section B of the project, 12 heritage assets have been assessed to experience a mid-level of less than substantial harm to their significance arising from the operational phase but have not been included in GG34 of the outline CoCP [REP3-025]. Equally, this comment will apply to other sections of the project, so explain why the limits of deviation have not been restricted in relation to all heritage assets that have been assessed as experiencing a mid-level of less than substantial harm, and/or include these in the next revision.	As set out in the response to ExQ1 HE 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, further to the detailed assessment presented in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and its appendices, the Applicant reviewed the alignment of the Project and undertook an assessment of the Limits of Deviation (LoD) across the route in order to inform the sensitivity testing set out in Section 11.9 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. This assessment concluded that movement within the LoD, except in the locations identified in commitment GG34 of **7.2 Outline Code of Construction Practice [Revision E]**, would not alter the conclusions of the assessment and in particular would not result in an increase in harm to heritage assets. Therefore, it is considered there is no reasonable cause to restrict the LoD in other locations other than those already included in commitment GG34. For the vast majority of heritage assets assessed for this Project, the nature and extents of their settings are not so clearly defined that the amount of movement that would be possible within the LoD would alter how those pylons interact with the asset's setting and therefore would not make an appreciable difference to the conclusion of assessment, i.e. an assessment of mid less than substantial harm would still be within this category should the alignment move within the LoD. For the historic environment there are also benefits in retaining flexibility in the LoD to allow

Reference	Question to	Question	Applicant's Response
			micrositing of construction works to avoid archaeology, if needed. Further information on this point is provided in response to ExQ2 HE 2.11 in this document. On this basis, the Applicant does not consider that further restriction of the LoD, or inclusion of additional assets within commitment GG34 of **7.2 Outline Code of Construction Practice [Revision E]**, is necessary or proportionate beyond what is already proposed.
HE 2.8	Pylons East Anglia Limited	Scoped out Heritage Assets The applicant responded to your ExQ1 response at [REP4-300]. In particular, the ExA notes its response to queries you had about properties that were scoped out of assessment including, but not limited to, Grindle House, Canes Farmhouse, The Grange, Godbolts Farm. In each instance the applicant has reviewed its approach and found its assessment appropriate and proportional. Bearing in mind the agreed principles on scoping out heritage assets found in paragraphs 3.11.1 to 3.11.6 of the ES Appendix 11.1 – Historic Environment Baseline Report [APP-209], do you have additional comments on heritage assets that have been scoped out of the assessment?	This question is not directed at the Applicant.
HE 2.9	Pylons East Anglia Limited	International Council on Monuments and Sites (ICOMOS) Guidance In Appendix A of your response [REP4-369] you refer to heritage guidance as	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		laid down by ICOMOS. The ExA are aware of ICOMOS and ICOMOS-UK guidance and consider that this has been incorporated into English planning policy through the National Planning Policy Framework and also into the Good Practice Advice in Planning (GPIP) guidance provided by Historic England. GPIP3 is particularly relevant in this case. If there is any additional ICOMOS or ICOMOS-UK guidance that you feel should be taken into consideration in relation to the setting of heritage assets, please submit it into the application.	
HE 2.10	The applicant	Assessment of impacts on archaeology In section 11.7 of ES Chapter 11 [AS-068] the assessment of residual effects for non-designated heritage assets includes both those on archaeology and on non-designated historic buildings. These have been combined to provide an overall assessment of likely significant effects. Having regard to the assessment in ES Chapter 11 and the results of the geophysical survey and trial trenching that have been undertaken so far, the applicant should set out what it considers the assessment of effects would be for archaeology alone.	The assessment presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** provides a holistic assessment of the historic environment as some heritage assets cannot be clearly defined as either archaeology or built heritage as they contain elements of both. However, the Applicant has provided below a list of likely significant residual effects for archaeological assets only. This information is derived from the most recent version of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. Residual effects assume that all mitigation – embedded (design measures), standard and any additional mitigation measures are in place before assessing the effects. The following list of archaeological assets is separated into 'Construction' and 'Operation (and Maintenance)' and then sub-divided into Sections A to H, as presented in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**.

Reference	Question to	Question	Applicant's Response
			Construction: *Section A* • Seven medium value non-designated archaeological assets (1010, 1013, 1024, 1122, 1130, 1168, 1227) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project. • One medium value non-designated archaeological asset (1332) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to physical impacts during construction of the Project. • One medium value non-designated archaeological asset (1364) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to both physical impacts and changes in its setting that affects its value during construction of the Project. *Section B* • One high value Scheduled Monument (1006049) would experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in its setting that affects its value during the construction phase of the Project. • Seven medium value non-designated archaeological assets (2134, 2136, 2037, 2241, 2248, 2249, 2316) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project.

Reference	Question to	Question	Applicant's Response
			• One high value non-designated asset (2003) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to physical impacts during construction of the Project. • There is potential for significant effects to the medium value non-designated archaeological asset (2260). However, the medium adverse magnitude of impact and moderate adverse effect would only occur if burials were identified within the Order Limits. If no burials are encountered, which is considered more likely, the impact is assessed as low adverse, resulting in a minor adverse effect, which is not significant, due to a small area of physical impact and changes within the setting of the asset which would affect its value. *Section C* • One high value Scheduled Monument (1002146) is predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in its setting that affect its value during the construction phase of the Project. • Four medium/high value non-designated archaeological assets (3233, 3237, 3238, 3042) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project. *Section D* • Eight non-designated archaeological assets (4059, 4063, 4078, 4081, 4082, 4088, 4102, 4072) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is

Reference	Question to	Question	Applicant's Response
			significant, due to changes in their settings that affect their values during the construction phase of the Project. • A medium value non-designated archaeological asset (4107) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to both physical impacts and changes in its setting that affects its value during construction of the Project. • Another medium value non-designated archaeological asset (4050) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to physical impacts during construction of the Project. *Section E* • Three medium value non-designated archaeological assets (5036, 5020, 5044) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project. *Section F* • Five medium value non-designated archaeological assets (6007, 6038, 6193, 6062, 6109) are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project. *Section G* • No likely significant residual effects to archaeological assets were assessed for the construction phase in Section G.

Reference	Question to	Question	Applicant's Response
			Section H • One high value Scheduled Monument (1009286) is predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect which is significant, due to changes in its setting that affects its value during the construction phase of the Project. • Five high and medium (8084, 8049, 8082, 8087, 8294) value non-designated archaeological assets are predicted to experience a medium adverse magnitude of impact resulting in a temporary moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the construction phase of the Project. • One medium value non-designated archaeological asset (8155) is predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to both physical impacts and changes in its setting that affects its value during construction of the Project. ***Operation (and Maintenance):*** *Section A* • Eight medium value non-designated archaeological assets (1010, 1013, 1024, 1122, 1130, 1168, 1227, 1364) are predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the operation (and maintenance) phase of the Project. *Section B* • Three medium value non-designated archaeological assets (2134, 2316, 2241) are predicted to experience a medium

Reference	Question to	Question	Applicant's Response
			adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the operation (and maintenance) phase of the Project. *Section C* • No likely significant residual effects to archaeological assets were assessed for the operation (and maintenance) phase in Section C. *Section D* • Six medium value non-designated archaeological assets (4063, 4081, 4082, 4102, 4107, 4072) are predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the operation (and maintenance) phase of the Project. *Section E* • No likely significant residual effects to archaeological assets were assessed for the operation (and maintenance) phase in Section E. *Section F* • Three medium value non-designated archaeological assets (6193, 6062, 6109) are predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the operation (and maintenance) phase of the Project. *Section G* • No likely significant residual effects to archaeological assets were assessed for the operation (and maintenance) phase in Section G.

Reference	Question to	Question	Applicant's Response
			Section H • Three medium value non-designated archaeological assets (8082, 8087, 8155) are predicted to experience a medium adverse magnitude of impact resulting in a permanent moderate adverse residual significance of effect, which is significant, due to changes in their settings that affect their values during the operation (and maintenance) phase of the Project.
HE 2.11	The applicant	Fordham Local History Society and Brumfelda In [REP4-360] and [REP4-352] Fordham Local History Society and Brumfelda raise concerns about the assessment of impacts on archaeology in these locations. Comment on these representations and explain the scope for avoiding impacts on these and any other important features identified as a result of trial trenching through the potential to micro-site any pylons at the detailed design stage.	The Applicant is aware of the archaeological potential in the areas of the possible Roman Temple at Stacey's Farm (Project ID - 6062) and the Romano-British building and associated funerary activity and cropmarks within the Fordham Hall Estate (4081, 4082). In response to the identification of asset (6062), pylon TB149 was moved southwards and located against the field boundary. The identification of assets (4081) and (4082) has resulted in pylon TB47 being moved to the north and into the adjacent field. The LoD for TB47 has been restricted in commitment GG34 to prevent southerly movement towards the archaeological site (**7.2 Outline Code of Construction Practice [Revision E]**). Likewise, the temporary haul road between pylons TB47 and TB48 was moved south-eastwards to further reduce the chance of impacting archaeological remains associated with the assets. As stated in the Applicant's response to [REP4-352] and [REP4-360] (**8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [Revision A]**), the pylon bases and temporary haul roads close to the assets have been geophysically surveyed and, furthermore, due to the archaeological potential of the Fordham Hall Estate, the extent of the Order Limits was geophysically surveyed in the vicinity of assets (4081) and (4082). The survey of the Fordham site has identified enclosures and discrete features likely to be related to the Roman-British building, but these geophysical anomalies, whilst within the Order Limits, lie outside the Project's areas of below ground impact based

Reference	Question to	Question	Applicant's Response
			on the current design. The geophysical survey of the Fordham site and Stacey's Farm has revealed only anomalies of agricultural (plough scaring), land drain, and natural origin. The results of the geophysical survey in the locations of the pylon bases and temporary haul road are due to be tested through archaeological trial trenching in the near future. With regard to the Stacey's Farm asset (6062), it is considered highly unlikely that related archaeological remains would be located within pylon base TB149 due to the evidence of the geophysical survey, and the evidence of an independent geophysical survey of the asset and the Project mapped cropmark data, which indicate the likelihood that the asset is relatively small and entirely located c. 200 m to the north-north-east of the pylon. In the unlikely event that significant archaeological remains, either associated with the assets or not, are identified there would be potential to move the pylon working areas and haul road within the LoD. The extent of any movement within the LoD would need to balance various considerations including (but not limited to) engineering feasibility, other environmental constraints, ground conditions and proportionality of costs, against the potential to reduce the impact on archaeology. For the specific area near asset (6062) there is a small potential to laterally move the pylon working area for TB149 due to the constraints of the Order Limits. Longitudinally, it would not be possible to move the pylon much further southwards, as the earlier move to the south means the span between pylons TB148 and TB149 is already one of the longest on the Project. A move to the north would take the pylon closer to the asset, which would further impinge on the setting of the asset. With regard to the Fordham Hall Estate assets (4081) and (4082), it is considered unlikely that related archaeological structural remains would be located within the pylon working area for TB47 due to the evidence of the negative geophysical survey results for the pylon working area and the fact that the excavated structural remains,

Reference	Question to	Question	Applicant's Response
			cropmarks and positive geophysical results are located over 100 m from the pylon working area. In the unlikely event that significant archaeological remains, either associated with the assets or not, are identified the approach to micro-siting within the LoD would be as set out for (6062) above, taking into account the restriction of the LoD for TB47 set out in GG34 (**7.2 Outline Code of Construction Practice [Revision E]**). There would be potential for limited micro-siting of pylons within the working area to avoid particularly sensitive archaeology (e.g. a temple precinct or a mosaic floor surface). In all cases there is provision in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**, secured through Requirement 5 of **3.1 Draft Development Consent Order [Revision E]**, for either preservation in situ or excavation under the terms of a Detailed Written Scheme of Investigation approved by the Local Planning Authority Archaeological Advisor, in consultation with Historic England if necessary.
HE 2.12	The applicant	Roman Villa and Hunting Lodge Complex, Fordham In [REP4-300] you have responded to the deadline 3 submission from Pylons East Anglia Limited [REP3-136] which contends the assessment of effects on the Roman Villa and Hunting Lodge, Fordham (Asset 4081). Expand on how you have concluded in [REP4-300] that this feature would not be of schedulable quality and explain the scope for any further micro-siting of pylon TB47 should the trial trenching	The medium value attributed to the Romano-British archaeological remains within the Fordham Hall Estate (4081, 4082, 4093) presented in Historic Environment documentation was concluded following the methodology set out in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, and based on the information held by the agreed sources identified in **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. The available information identified the presence of a high-status burial in a lead coffin, two other burials, a notable concentration of ceramic building material, and cropmarks of conjoined rectilinear enclosures and large discrete pits which was taken as evidence of the likely location of a high-status Romano-British building with associated cemetery. This interpretation was confirmed when during

Reference	Question to	Question	Applicant's Response
		results indicate the presence of significant archaeology.	consultation the Applicant received an unpublished document from Fordham Local History Society detailing the findings of an ongoing community archaeological dig focussed on the site (Oldham, 2024, *A Brief History and summary of the Fordham Roman site*). The Applicant reviewed the supplied evidence and, following the agreed methodology set out above, concluded the archaeological remains constitute a site of medium regional significance (value). In response to this question the Applicant has assessed this asset in accordance with 'Scheduled Monuments and nationally important but non-scheduled monuments, Annex 1: Principles of Selection for Scheduled Monuments' (Department for Culture, Media and Sport, 2013). The guidance provided by Historic England through their Introductions to Heritage Assets and Scheduling Selection Guides has also informed the assessment. These are the criteria used to determine whether heritage assets of archaeological interest warrant designation through scheduling and is therefore a robust approach to demonstrating whether archaeological assets have equivalent significance with scheduled monuments. When assessing a heritage asset for its designation as a Scheduled Monument, the Secretary of State is guided by the principles set out in the reference noted above (Department for Culture, Media and Sport, 2013), namely: period, rarity, documentation/finds, diversity, group value, potential, survival / condition, and fragility / vulnerability. As one of over 600 villa sites across England, with the majority clustered in the south-east, the asset is not comparatively rare as a site type, particularly within its region, nor as a representative of its historical period. The asset has no contemporary documentation although the excavation records, plans and photos document the asset's archaeological value. The community excavations at the site of the asset have produced a large finds assemblage that indicates the moderately high status of the villa. The pottery assemblage is typical of such sites comprising largely of locally produced grey wares and black burnished wares.

Reference	Question to	Question	Applicant's Response
			Smaller quantities of more rare material such as Central Gaulish and Rhenish-type fine colour-coated wares, North African red slipped ware, and Samian ware indicate some wealth and access to trade routes and centres. Over 70 pieces of cut and polished marble have been recovered that were likely used as floor or wall covering. The fragmentary nature and the likely displacement from their original context, however, reflects the highly robbed out nature of the structural remains of the asset. The mismatched nature of the marble (types and thickness) suggests it is likely that most of the material was recycled from Roman Colchester. Glass, metal and animal bones are typical of a small local villa, although 26 engraved bone or antler plaques are unusual and worthy of note. Overall, the finds suggest a moderately high-status household which likely had some influence in local Romano-British society. The excavation of the asset has revealed moderate diversity based on potential evidence of a bathhouse, a hot room and a furnace, lead water piping, drains, concrete flooring, mosaic cubes, and perhaps most interestingly the remains of pool or piscina, possibly with a fountain. The Romano-British period is well represented in the Colchester area and no more so than the city of Colchester itself which, when known as Camulodunum, played a pivotal role as a colonia and the capital of Roman Britain. The centre of Colchester is, however, about 7.5 km to the south-east of the asset and evidence of Romano-British activity nearer the asset and within the Study Area is limited findspots and undated cropmarks that may be of Romano-British date limiting the group value of the asset. Geophysical survey around the asset and cropmark data suggests enclosures and discrete feature in the land to the south of the asset but little else. The potential of the asset to have greater potential than what is already apparent is, therefore, considered to be low. The survival / condition of the asset, whilst retaining archaeological interest, has been greatly impacted by robber trenches which have removed almost all the structural stone from the asset (Oldham, 2024, *A Brief*

Reference	Question to	Question	Applicant's Response
			History and summary of the Fordham Roman site). The stone was likely taken in antiquity and the claiming of it did not only result in the loss of all structural elements down to the base of the foundation cut, it would have also disturbed associated archaeological remains, leading to a moderate rate of survival at best. Currently, as the focus of the community excavation, the site of the villa appears to be in an unploughed portion of the field it lies within, and so is not considered to be vulnerable. This additional assessment has not changed the assessment of value concluded in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, and consequently there is no change to the significance of effect and number of significant effects reported in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The Applicant is, therefore, confident that the medium value assigned to the asset in adherence with the professional guidance and methodologies noted above, is proportionate based on the available evidence. The Applicant notes that in its review of the Applicant's assessment, Historic England did not make any comments on the valuation of the asset, and it is, therefore, assumed that Historic England is in agreement. With regard to the micro-siting of pylon TB47, please see response to HE 2.11 above.
HE 2.13	All local authorities	Updated version of the outline AMS/ outline WSI 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	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		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.	
HE 2.14	The applicant	Mitigation of impacts on archaeology in the Waveney and Stour Valleys In the latest version of the SoCG with Historic England [REP4-083] it is noted that Historic England has outstanding concerns which are classified as being "under discussion" about potential impacts on the Waveney and the Stour Valley. Reference is made in [REP4-083] to further assessment at Bush Hall. Is this survey work which the applicant is scheduled to undertake and, if so, when would the results be made available and how would any findings that might lead to this site being considered a 'high value' asset be incorporated into appropriate mitigation measures? Also, in [REP4-083] the applicant states that dewatering would be mitigated through GH07 and GH14 of the outline CoCP which was [REP2-014] at that time of writing, but which has now been superseded by [REP4-	The majority of Bush Hall (1013) in the Waveney Valley is located outside the Order Limits. The eastern end of the asset, which is within the Order Limits, has been subject to geophysical survey as reported in **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [REP4-127 – REP4-144]**. As the asset is largely outside the Order Limits, and where the small proportion is within the Order Limits, this is outside any areas of likely physical impact and so no trial trenching is proposed within the asset itself. The site has already been subject to embedded mitigation through design, in order to avoid physical impacts to this asset. As a result, there are currently no anticipated direct physical impacts to Bush Hall (1013). The closest pylons are RG86 and RG87 and these, and the associated haul road, have already been subject to geophysical survey as reported in **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [REP4-127 – REP4-144]**. Trial trenching of the pylon working areas and haul road in the area adjacent to Bush Hall (1013) is due to be undertaken as part of the phase 2 trial trenching, programmed for later in 2026. The results of this evaluation will be shared directly with the Archaeological Advisors to the Local Planning Authorities for approval and in order to agree any appropriate mitigation for these areas, as set out in **7.5**

Reference	Question to	Question	Applicant's Response
		164]. Explain what, if any, monitoring and mitigation mechanism would be in place to assess any potential immediate 'live' effects of dewatering on any features of archaeological interest. In addition, reference is made in [REP4-083] to the need for provision to be made to manage high value archaeology within the Stour valley area should it become necessary. The ExA is aware of the various mitigation techniques set out in Table 2.1 of the OAMS and OWSI. In the event that high value archaeological features are discovered, the applicant is asked to explain how the consultation process that is set out in H04 of the outline CoCP [REP4-164] would be followed in practice in order to determine the appropriate mitigation route to be followed. For example, whether there would be preservation in situ or intrusive archaeological fieldwork before archaeological remains become lost. How would any disputes between the views of the applicant and those of the local authority/ Historic England regarding the need for in situ preservation be resolved?	**Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**. In the unlikely event the evaluation identifies archaeology of high value in this area, flexibility within the design would allow for micro-siting of pylon working areas and haul road to avoid impacts where practicable. The reference in the latest version of **5.9.14 Draft Statement of Common Ground - Historic England [REP4-083]** by the Applicant to further archaeological work was reference to theoretical future investigation should this be undertaken for research purposes but is not required for the Project, as set out above. In the Stour Valley, geophysical survey has been undertaken as reported in **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [REP4-127 – REP4-144]**. Engineering ground investigation works were subject to geoarchaeological monitoring as reported in **6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**, and the next phase of ground investigation works will also be subject to geoarchaeological monitoring in line with a Written Scheme of Investigation (WSI) shared with Historic England and the Archaeological Advisors to the Local Planning Authorities on 22 May 2026. The results of this monitoring will be shared directly with the Archaeological Advisors to the Local Planning Authorities for approval, Both of these phases of work will inform future purposive geoarchaeological work in this location, to be agreed through a Detailed WSI as set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**. Trial trenching in the area has been largely completed, with the exception of 22 trenches in a field on the south side of the River Stour where access has not yet been possible, but is now scheduled for summer 2026. Trial trenching is reported in **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching**

Reference	Question to	Question	Applicant's Response
			Results Report [AS-078] and further assessment reports will be shared directly with the Archaeological Advisors to the Local Planning Authorities for approval and in order to agree any appropriate mitigation for these areas. Concerning dewatering, **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]** concludes that dewatering is not anticipated. The exception to this is at trenchless crossing locations where dewatering of construction excavations may be required. In any locations where dewatering is required, mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision E]** (including GH07 and GH14) would apply to control groundwater effects. Commitment GH11 provides that, '*At trenchless crossings and where otherwise indicated in the ES, within Appendix 9.3: Groundwater Baseline and Qualitative Groundwater Risk Assessment (document reference 6.9.A3), a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors*'. Taken together commitments GH07, GH11 and GH14 ensure that any locations where dewatering is required would be managed to ensure as little change to the hydrological environment as possible. In practice, dewatering would be controlled and limited to the extent necessary for the construction area, the duration of dewatering would be kept as short as practicable, and the areas would be rewatered as quickly as possible. As a result of this the existing commitments provide protection to any archaeological remains within any area where dewatering is required, including those not directly exposed during construction and outside the areas of direct physical impact of the Project. Noting that archaeological remains within areas of direct physical impact from construction would be mitigated in advance of works in accordance with **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B].** Where archaeological features are not exposed, i.e. where they are outside

Reference	Question to	Question	Applicant's Response
			areas of direct physical impact, there would be no direct visibility of effects on such remains. It is considered that the current measures provide suitable controls to avoid significant effects on any archaeology as a result of dewatering and therefore monitoring of archaeological assets, or other receptors, during dewatering is not proposed. The consultation process is set out in Section 5.2 of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**, which includes provision for a communication strategy for archaeological mitigation to be developed in line with Section 3.2 of **7.2 Outline Code of Construction Practice [Revision E]**. Where archaeological remains of higher significance are identified, both preservation in situ and intrusive archaeological fieldwork would be considered as potential mitigation options. The appropriate mitigation approach would be determined on a case-by-case basis, taking into account: • The significance and nature of the archaeological remains • The need to deliver the Project and its associated public benefits. Where preservation in situ is not practicable (for example, where it would prevent delivery of the Project), excavation and recording would be undertaken as the alternative mitigation approach. The Limits of Deviation provide flexibility to avoid impacts where feasible. In the event of disagreement between the enforcing authority and the Applicant as to what measure (preservation or excavation and recording) was 'practicable' within the Project construction requirements in a particular circumstance, the Applicant considers that there are established appropriate mechanisms within **3.1 Draft Development Consent Order [Revision E]** to resolve such matters. A process for dispute resolution has also been added to

Reference	Question to	Question	Applicant's Response
			Section 5.2 of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B]**. The Applicant also recognises that the question may arise in circumstances where a Requirement has already been discharged and the Applicant is implementing the authorised development (including where a measure is expressed in permissive terms such as 'where practicable'). If the enforcing authority considers that the Applicant has failed to comply with the DCO (including proceeding without the agreement of the relevant discharging authority as to what is practicable in the circumstances), it may follow the procedures under Part 8 (enforcement) of the Planning Act 2008, which include requiring further information. In that scenario, whether a measure was 'practicable' would be determined through the enforcement process, where the Applicant must justify its approach with evidence.

8. Health and wellbeing

Table 8.1 Health and welbeing

Reference	Question to	Question	Applicant's Response
HW 2.1	The Applicant	Communication Strategy In your response to **ExQ1 HW1.9 [REP3-074]** in relation to Colchester City Council's Local Impact Report (point 5 – a robust health and wellbeing monitoring framework with enforceable commitments) amongst other matters you state: "It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health over the pre-construction, construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and speed of escalation. This would help understand where further communication may be required with local communities".	The Applicant considers that a proportionate and robust approach to managing impacts on health and wellbeing (and particularly impacts on mental health and wellbeing as highlighted by stakeholders such as Colchester City Council and other host authorities) comprises: • A proactive approach to communication and community engagement during the pre-commencement and construction phases of the Project. As noted in the response to HW 1.9 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant has set out the approach to ongoing engagement and communication, with a commitment to develop a detailed Communication Strategy as detailed within **7.2 Outline Code of Construction Practice [Revision E],** which is secured through Requirement 4 of the **3.1 Draft Development Consent Order [Revision E]**. The detailed Communication Strategy will set out an approach to active community liaison, to ensure that residents and stakeholders are appropriately informed of upcoming construction activities and provided with meaningful ways in which to respond / engage which are inclusive • A comprehensive and robust complaints system. The Applicant is committed to developing a detailed complaints management procedure, which will be submitted at Deadline 6 and which will include information relating to how complaints can be made (e.g. phone, email, letter), how they will be responded to, and mechanisms for escalation where required. A further commitment relating to how complaints data will be analysed and reported on has been included in new commitment GG37 in the latest iteration

Reference	Question to	Question	Applicant's Response
		The suggestions put forward would appear to be applicable across the range of points raised on this issue by a number of local authorities. However, there are no commitments included in the outline **CoCP [REP4-164]** or commentary related to such matters in its **Appendix E [REP4-168]**. The ExA are of the view that appropriate commitments in the outline CoCP or commentary in Appendix E to set out such approaches would be necessary to bring the suggestions into effect and ensure there were appropriate enforceable commitments in the DCO documentation. The applicant is asked to update either the outline CoCP or appendix E to include suitable wording to bring into effect your suggested actions. If not explain why not.	of **7.2 Outline Code of Construction Practice [Revision E]** submitted at Deadline 5. This states that '*Active community liaison will form part of the approach to managing community stress and anxiety over the pre-construction and construction periods. In addition to the detailed communication strategy referred to, a robust and accessible complaints procedure will be developed. Information relating to complaints (e.g. theme, type of action and speed of escalation) will be reported regularly and used to help understand where additional communication approaches or other action may be required'.*
HW 2.2	The Applicant	Electric and magnetic fields – microshocks ARU Writtle in its submission at deadline 4 **[REP4-348]** amongst other matters has raised the issue of microshocks and the potential for a requirement to protect their land. The report **7.8 Electric and Magnetic Field Compliance Report [REP3-**	The Applicant has provided a response to this question in **8.4.11.1 Applicant Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2 [Revision A]**. The Applicant acknowledges that ARU Writtle raises a number of matters in its Deadline 4 submission **[REP4-348]**, some of which are inter-related, and therefore to aid the reader, the Applicant has sought to provide a single document responding to all matters raised by ARU Writtle rather than split its response across multiple documents.

Reference	Question to	Question	Applicant's Response
		034] contains reference to microshocks at section 2.9. This includes paragraph 2.9.6 refers to embedded measures have been applied to the design in line with the Code of Practice on Microshocks. The applicant should provide a detailed response to the ARU submission on this matter, and also confirm what the embedded measures referred to in 2.9.6 are and how these are secured through the draft DCO.	

9. Land use and soils green infrastructure

Table 9.1 Land use and soils green infrastructure

Reference	Question to	Question	Applicant's Response
LUS 2.1	The applicant	Acid Soils Natural England's response to ExQ1 LUS 1.4 [REP4-344] directs the statutory responsibility for mitigation measure GH08 contained in the outline CoCP [REP4-164] to local authorities and the Environment Agency. Can the Environment Agency please respond to the original question ExQ1 LUS 1.4 in [PD-014] and advise whether commitment GH08 would be sufficient to address any concerns that would arise from the discovery of unexpected acid soils.	This question is not directed at the Applicant.
LUS 2.2	The applicant	Green Belt - 1 In response to LUS1.10 in [REP3-074] you refer to paragraph 3.9.40 of the Yorkshire Green project report (EN020024) to justify that pylons and lines are engineering works. However, you only quote the first sentence and do not reference the second sentence of that	The Applicant notes the request from the ExA. Noting the position adopted for the Yorkshire GREEN Project and notwithstanding the anticipated response from Thurrock Council to ExA WQ LUS 2.3 (and the Applicant's case on grey belt), we are content for the ExA and the Secretary of State to proceed on the basis that all new development forming part of the Project in the Green Belt is inappropriate, without needing to reach any view as to why that is the case. The Applicant considers that should the ExA conclude that the Project constitutes inappropriate development in the Green Belt there are very

Reference	Question to	Question	Applicant's Response
		paragraph which goes on to state: "In order to benefit from the exception under NPPF para 150, development must also preserve the openness of the Green Belt and not conflict with its purposes". Whilst the ExA for that NSIP identified the works as engineering operations, they did not accept that they benefitted from the exception in paragraph 150 of the NPPF, and indeed in subsequent paragraphs concluded there would be harm to openness and the purposes of the greenbelt and that the exclusion did not apply. The local authorities maintain their position that these works would be inappropriate development, whilst you maintain your position that even if concluded that they are inappropriate very special circumstances exist to outweigh any harm. This is a similar position as was arrived at in Yorkshire Green and National Grid in its final position statement, as recorded at paragraph 3.9.39 of Yorkshire Green Report which stated: "(g)iven the parties agree that elements of the development in the Green Belt would be inappropriate, albeit for differing reasons, National Grid is	special circumstances (VSC) to justify development. The VSC were outlined in the **5.6 Planning Statement [APP-085]** and include: • The UK government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used • The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by the 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term • New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected into East Anglia by 2030. These connections are being constructed or expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required • The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy to low-carbon electricity • By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030. Whilst the need case justifies the Project's VSC, the current position as set out in National Policy Statement (NPS) EN-1 (2024), is that critical national priority (CNP) Infrastructure, subject to the application of the mitigation hierarchy, meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '…*the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests: where development within a Green Belt requires very special circumstances to justify development*'.

Reference	Question to	Question	Applicant's Response
		content for the ExA and the Secretary of State to proceed on the basis that all new development forming part of the Project in the Green Belt is inappropriate, without needing to reach any view as to why that is the case". The applicant is asked whether it is in a position to reach a similar conclusion and provide this to the examination. If not please explain your reasoning.	Finally, the Applicant would wish to highlight that in responding to LUS 1.10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** we stated that for both the Hinkley C Connection Project and Yorkshire GREEN Project that the respective ExA concluded that '*whilst… the overhead lines were an engineering operation, it was concluded on both of those projects that there would be an adverse effect on Green Belt openness and as a consequence those proposals were considered to be inappropriate development in the Green Belt. In the ExA assessment of both the Hinkley C Connection and Yorkshire GREEN Project, it was concluded that any harm to the Green Belt would be clearly outweighed by the need to connect new low carbon generating capacity in order to meet the UKs energy needs and carbon reduction targets as set out in EN-1 and that this represents the very special circumstances to justify development in the Green Belt.'*
LUS 2.3	Thurrock Council	Green Belt - 2 In the applicant's response to Local Impact Reports [REP2-030], at paragraphs 3.14.23 - 3.14.25 and in its response to ExQ1 LUS1.13 [REP3-074] it argues that the land associated with the Tilbury North Substation and the two associated cable sealing end compounds are Grey Belt land. Thurrock Council is asked to comment and confirm whether you consider the land to be Grey Belt, explaining your reasoning.	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
LUS 2.4	The applicant All local authorities	Green Belt - 3 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.	The Applicant notes that the National Planning Policy Framework (NPPF)[12] introduces the ability for local communities to protect green spaces of local significance by designating them as Local Green Spaces in Local Plans and Neighbourhood Plans. This designation would prevent new development being permitted on these spaces unless very special circumstances (VSC) exist. The Applicant notes that in England, National Policy Statement EN-1 (2024) identifies that Local Green Spaces may be designated locally in Local Plans and Neighbourhood Plans. These enjoy the same protection as Green Belt in England and the Secretary of State should adopt a similar approach (see paragraph 5.11.38 of NPS EN-1 (2024)). The **5.6 Planning Statement [APP-085]** identified areas of Local Green Space as part of the Open Space Assessment. The following areas of Local Green Space were identified at the point of submission. Local Green Spaces were identified following a review of adopting and emerging Local Plans and Neighbourhood Plans. **Tendring District Council** Glebe Corner: Glebe Corner is located adjacent to Harwich Road on the edge of the settlement of Ardleigh. The land is identified in the Ardleigh Neighbourhood Plan[13] as a Local Green Space designation. The Tendring Local Plan Review 2025–2042[14] also identifies Glebe Corner as a Local Green Space. The land is designated as a Local Green Space for its landscape, heritage and ecological value, and there is no reference to recreational uses. Within the **5.6 Planning Statement [APP-085]** the site was provided with the reference OS/45. The works noted at this location include the undergrounding of an existing 33 kV overhead line which will be routed through Glebe Corner. The

[12] Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

[13] Tendring District Council (2024) *Ardleigh Neighbourhood Plan*

[14] Tendring District Council (2026) *Tendring District Local Plan Review 2025-2042 and Beyond*

Reference	Question to	Question	Applicant's Response
			undergrounding works will result in a temporary above ground impact on this land These works will have no permanent above ground impact as the land will be restored following the completion of works. Fishing Lake North of Colchester Road: The fishing lake and existing Public Rights of Way (PRoW 158_4 and 158_22) form part of a Local Green Space designated in the adopted Ardleigh Neighbourhood Plan. The Ardleigh Neighbourhood Plan states that by virtue of the PRoW this space '*has been used for recreational walking by villagers for hundreds of years. It provides the only glimpse of open countryside available from Colchester Road (within the built-up area of the village)*'. The Tendring Local Plan Review 2025–2042 also identifies the fishing lake site as a Local Green Space. The Project will oversail the fishing lake at a diagonal angle between pylons TB13 and TB14. **Basildon Borough Council** Langdon Complex: Part of Langdon Complex is identified as a Local Wildlife Site in the Basildon Borough Local Wildlife Site Register (2020) and the Basildon Council Local Wildlife Site Review (2021). It is identified as a Site of Importance for Nature Conservation in the adopted Basildon District Local Plan[15]. The site is shown as Public Open Space and Local Green Space in Basildon's emerging Local Plan[16]. The site is located to the east of proposed pylon TB232 and existing pylon PAB50. It is separated from the Order Limits by Lower Dunton Road, which runs along its western boundary. The site is not directly affected by the works and there will be no impact on its function or use as open space. A further review of Local Plans and Neighbourhood Plans has been undertaken in response to this question. No additional areas of Local Green

[15] Basildon Borough Council (2007) *Basildon District Council Local Plan*

[16] Basildon Borough Council (2025) *Basildon Local Plan Review*

Reference	Question to	Question	Applicant's Response
			Space have been identified. The Applicant notes that no additional areas of Local Green Space were identified by the local authorities in response to ExQ1 LUS 1.14. Noting that Local Green Spaces enjoy the same projection as Green Belt, the Applicant considers that there are VSC to justify development. The VSC were outlined in the **5.6 Planning Statement [APP-085]**.
LUS 2.5	The applicant	Green infrastructure and open space Review and respond to the comments from the following parties in response to ExQ1 LUS1.14: a) Thurrock Council [REP3-088] b) Chelmsford City Council [REP3-075] c) Tendring District Council [REP3-094] d) Essex County Council [REP3-078]	The Applicant has responded to the comments made by Thurrock Council, Chelmsford City Council, Tendring District Council and Essex County Council in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. In addition, commentary from Brentwood Borough Council, Braintree District Council, Babergh and Mid Suffolk District Councils and Suffolk County Council was also acknowledged and responded to in the same document.

10. Landscape and visual

Table 10.1 Landscape and visual

Reference	Question to	Question	Applicant's Response
LV 2.1	The applicant	Thorington Street, Dedham Vale Dark Skies The hamlet of Thorington Street within the Dedham Vale National Landscape has been recently designated as a dark sky community. Confirm if this designation will change the findings of the ES, in particular Chapter 13 [APP-226]. If so, explain how and confirm if levels of significance change as a result. If not, please explain why.	The designation of Thorington Street as an International Dark Sky Community[17] would not change the findings of the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying appendices. As noted in the Applicant's response to DES 1.9 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant has considered lighting during construction. No assessment of operational lighting on visual receptors was undertaken due to the limited potential for significant effects. The settlement of Thorington Street is located within Dedham Vale National Landscape, approximately 2 km from the Order Limits for the Project, at its closest point. The Project will be undergrounded through the National Landscape and its setting. An assessment of visual effects within this area is provided under Visual Receptor Area (VRA) C8 Higham in paragraphs 13.6.83 to 13.6.94 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects are identified as significant within approximately 0.5 km during construction, as a result of construction activity associated with the proposed underground cable. No significant effects are identified at operation. LVIA Viewpoint 3.27 B1066 Park Road, near Thorington Street is located to the west of Thorington Street and represents views from

[17] DarkSky (2026) *Thorington Street, Suffolk* https://darksky.org/places/thorington-street-suffolk/

Reference	Question to	Question	Applicant's Response
			this area. Visual receptors are identified as being of high sensitivity and the magnitude of effect during construction and operation (and maintenance) is judged to be barely perceptible. Effects were identified as negligible and not significant during construction and operation (and maintenance), as set out on pdf page 151 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]**. This judgement considers construction activity including lighting. The designation of Thorington Street as an International Dark Sky Community would not change the sensitivity of visual receptors (which is already high), nor the magnitude of effect, as construction activity (including lighting in the hours of darkness) is unlikely to be perceptible.
LV 2.2	The applicant	Link pillars 1 The ExA are seeking further clarity on the siting, design and appearance of the link pillars. Confirm: a) the maximum number of link pillars along each underground cable section based on a worst case scenario b) if the frequency of the joint bays and link pillars changes between the different installation methods (open-cut or ducting) c) the height of surrounding post and rail fence d) surface treatment within the link pillar compound e) size (maximum dimensions and square metre) of link pillar	a) **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, paragraph 4.9.14 sets out the typical distances between the joint bays. Furthermore, the cable lengths for each section are presented in Table 4.8. As set out in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, Action Point 29, '*The link pillar locations are dependent on the length of the cable sections which can be influenced by the detailed cable system design, the crossing constraints along each section and the access constraints. It is therefore not possible to confirm overall numbers or locations of link pillars until detailed design has been undertaken'*. Furthermore, '*Numbers and locations of link pillars are largely decided by the technical requirements of the cable system. However, the requirement for economy and efficiency under licence would limit the number of joints, as longer sections and fewer joints represent the most economic and efficient solution. This is also technically preferred from a maintenance point of view, as joints are more likely to require maintenance than cable sections mid-span. The Applicant's duties to protect the environment (incorporating duties to protect National*

Reference	Question to	Question	Applicant's Response
		compounds, where link pillars are grouped together	*Landscapes) would further influence the numbers and locations of link pillars*.' As highlighted above the economic, environmental and technical drivers for cable system design are to maximise the section length and minimise the number of joint bays. Limitations on the transportation of cable lengths terrestrially via Heavy Goods Vehicle (HGV), and specifically the size and weight of the transport vehicle, mean that cable lengths are limited to approximately 1 km in length. However constraints along the alignment of the route including trenchless crossings under various constraints and the suitability of access routes can further impact the available length of each cable section. The cable system design and preferred bonding strategy can also impact the section lengths. Taking a reasonably worse case an average cable section length of 800 m can be assumed; although some sections may be shorter they would be outweighed by longer sections elsewhere along the route. Using circa. 800 m results in the following: – Dedham Vale National Landscape (DVNL), Section C in total (noting it includes land within the DVNL as well as land outside the DVNL) extends to 16.8 km: 20 joint bays and link pillars per trench. As a worst-case scenario this would require 120 link pillars (for six trenches). Approximately 5.7 km of this cable route is within the National Landscape, resulting in 42 link pillars being required as a worst case within the National Landscape itself. These would be grouped into six link pillars in any given location and on average 800 m between groupings. It is not technically possible to collocate all six link pillars together therefore it is likely that there would be three groups of two spread across the easement swathe

Reference	Question to	Question	Applicant's Response
			– Great Horkesley, Section D, 3.9 km: five joint bays and link pillars per trench. As a worst-case scenario this would result in 30 link pillars – Fairstead, Section E, 0.15 km: 0 joint bays and link pillars – North Tilbury (YYJ route), Section H, 0.6 km: one joint bay and link pillar per trench. As a worst-case scenario this would result in six link pillars. b) The difference in installation methods between ducted cables and direct buried cables, would not directly influence the location or number of the joint bays and link pillars, noting ducted installation is the preferred approach for the Project as stated in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, paragraph 4.8.68. However, at the locations where ducting is not the best solution, such as where topography limits installation techniques, locating link pillars in these areas would also be challenging. One installation method that may influence the positioning of joint bays and link pillars is the use of trenchless construction methods. In particular, where Horizontal Directional Drilling (HDD) is proposed as joint bays and link pillars cannot be located within the mid-span of an HDD crossing. This constraint forms part of the cable system design considerations as set out in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, Action Point 29. Other constraints including existing services, access, land use and visual impact must be considered as well as the crossing constraints when locating the joint bays and link pillars. c) The height of the surrounding post and rail fence would typically be similar to the agricultural fencing encountered in the same area. Where large livestock may be present, higher fencing will be specified to ensure the link pillars remain sufficiently

Reference	Question to	Question	Applicant's Response
			protected. In accordance with BS 1722-7[18] guidance the height of a wood post fence will typically be a maximum 1.3 m, unless otherwise required. d) The surface treatment within the compound would typically be reinstated soil, seeded with grass, as can be seen in **2.6.1 Design and Layout Plans – Subs and Cables [Revision C]**, drawing AENC-MMAC-ENG-DWG-0085-06A, which provides an example image of a pair of link pillars for further context. Other surfacing may be considered where appropriate; for example in scenarios where the link pillars are located adjacent to existing hard standing areas, crushed granular material may be used. Crushed granular material or paving slabs may be used immediately adjacent to the doors of the link pillar to retain a clear working space. e) Where link pillars are grouped together, two cabinets would be located adjacent to each other (back to back) and the surrounding fenced area would be approximately 4 m x 4 m. This is depicted in **2.6.1 Design and Layout Plans – Subs and Cables [Revision C]**, drawing AENC-MMAC-ENG-DWG-0085-06A. Note that if a maximum value is required 5 m x 5 m should be used to allow for local variations.
LV 2.3	The applicant	Link pillars 2 The applicant is asked to: a) Update 2.6.1 Design and Layout Plans – Subs and Cables Drawing (AENC-MMAC-ENG-DWG-0085-06) [REP1-003] to include elevations and layout plans for link pillar	a) The Applicant has updated and reissued **2.6.1 Design and Layout Plans – Subs and Cables [Revision C]**, providing an additional drawing (AENC-MMAC-ENG-DWG-0085-06A) which provides details of an indicative combined link pillar compound. Furthermore, an example image has been provided for further context. b) The underground alternative solution to link pillars would be the use of link boxes in buried chambers, this solution would require the same fenced compound as the proposed link pillar solution.

[18] British Standards Institution (2018) *BS 1722-7:2006+A1:2018 Fences - Specification for wooden post and rail fences*

Reference	Question to	Question	Applicant's Response
		compounds where link pillars are grouped together. b) Comment whether underground alternatives to the link pillars been considered? If so, explain why they have been discounted.	Underground alternatives such as link boxes, present increased system operation risks and are more restrictive with regards to maintenance. There is an increased risk of water infiltration into link boxes that could fill with water causing operational issues and requiring additional vehicles including pumps and bowsers to be brought to site during monitoring visits; this could increase the level of activity for site visits and can pose increased risk to maintenance staff and equipment. Maintenance and monitoring of equipment buried in link boxes also poses an ergonomic risk to maintenance staff requiring working with confined access to the equipment. Given that the same compound requirements are required for both options the preference is for the link pillar solution as it reduces risk and improves operatives working environment.
LV 2.4	The applicant Suffolk County Council Essex County Council Babergh District Council Tendring District Council Dedham Vale National Landscape and Stour Valley Partnership	Link pillars 3 The ExA are considering how the siting and detailed design of the link pillars and compounds are secured and approved by the relevant discharging authority, bearing in mind requirement 12 relates only to buildings. a) The applicant is asked to provide an appropriate form of wording in the draft DCO and / or control documents. This should include (but not limited to) siting, colour, appearance, compound size, surface treatment, fencing appearance and dimensions, and maintenance access. b) Do the relevant discharging authorities have any views on how	As set out above in LV 2.2, the siting of joint bays and link pillars is influenced by many factors. Furthermore, as explained in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** (page 27), '*the link pillars are considered in the assessment within **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying appendices **[APP-228 to APP-232 and APP-235]**. The landscape and visual assessment related to the underground cables and associated link pillars is based on the description within paragraphs 4.9.13 to 4.9.16 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The findings of the landscape and visual assessment are that the introduction of above ground link boxes along the underground cable route would form small components in some views. These would be locally perceptible as relatively discreet features.'* a) The Applicant has updated the Design Approach for Site Specific Infrastructure (DASSI) to include the requested information and has re-issued the document at Deadline 5 (**7.16 Design Approach for**

Reference	Question to	Question	Applicant's Response
		detailed design matters should be controlled and discharged?	**Site Specific Infrastructure (DASSI) [Revision C]**). Section 5.6 of the DASSI outlines the design co-ordination for the link pillars, providing further details on: • Boundary treatment • Surface treatment • External colour of the link pillar cabinet. The DASSI is a certified document under Schedule 19 of the **3.1 Draft Development Consent Order [Revision E]**. The Applicant is considering appropriate requirement drafting to secure link pillar design matters and will provide an update at Deadline 6.
LV 2.5	The Applicant	Link pillars 4 There is a general presumption that the link pillars would be located adjacent to field boundaries, although it is understood that the cable system design restricts the flexibility for micro-siting. In these locations, where existing field boundary vegetation does not provide visual screening of the link pillars, what is the impact on the local landscape character and visual amenity of the Dedham Vale National Landscape and its setting? Include in the response consideration of sequential impacts on users of the public rights of way (PRoW) network and other visual receptors travelling through the National Landscape.	**Link pillar context** As explained in the Applicant's response to LV 2.2, point a) above, the reasonable worst-case scenario for numbers of link pillars within Dedham Vale National Landscape (DVNL) is 42. This would result in seven groups, each containing six link pillars. The link pillars would be grouped into three pairs, within three timber fenced areas. There would be an average of 800 m distance between the seven groupings. As also noted in response to LV 2.2 and also set out previously within the Applicant's response to point 29 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, there are several drivers to maximise the section length and minimise the number of link pillars required along the underground cable route. It is therefore possible there will be less than 42. One of the drivers to reducing numbers of link pillars relates to the Applicant's duty under section 85 of the Countryside and Rights of Way Act 2000 to seek to further the purposes of conserving and enhancing the natural beauty of DVNL. An example of link pillars in an open view is provided below. This image is taken from National Grid's Dorset VIP Project and

illustrates two pairs of link pillars (i.e. four link pillars) within two timber fenced areas.



Landscape and visual impact within DVNL and its setting

As explained in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** (page 27), '*The findings of the landscape and visual assessment are that the introduction of above ground link boxes along the underground cable route would form small components in some views. These would be locally perceptible as relatively discreet features.*'

Where existing field boundary vegetation does not provide visual screening of link pillars, the impact on local landscape character and visual amenity of DVNL and its setting remains the same as set out in the Landscape and Visual Impact Assessment. As illustrated in the example image above, taken from the Dorset VIP Project, link pillars are relatively low-level, small-scale features with post and rail fencing that can be coloured to tie in with the local landscape. The Applicant acknowledges that these features could be locally visible in some views, including circumstances where they may be close to people travelling through DVNL, where no intervening hedgerows or vegetation are present. However, link pillars are not out of scale in terms of features such as agricultural fencing and other manmade

Reference	Question to	Question	Applicant's Response
			objects such as gas pipeline markers, sign posts and other visible utilities, that can be seen in DVNL. Furthermore, given their low-lying nature and small size, and their relatively rural character, the ability of people to perceive link pillars in the landscape and in views will reduce rapidly with distance, particularly where there are intervening hedgerows and other layers of vegetation. **Landscape** In summary, effects of the link pillars on the landscape character of DVNL, and on its setting where present in this area will relate to the occasional presence of groups of link pillars within wooden fencing within the landscape. The features will be reasonably small, low lying and discrete and reasonably rural in appearance. The effects of these features on landscape character will be minor and not significant, given their well-spaced and occasional nature. In some areas it may be possible to experience several groups at the same time, but in this case those that are further away are likely to be barely perceptible, and generally speaking hedgerows and trees will provide a high level of filtering. They will be domestic scale features, which over time will weather to better integrate with the landscape. As such they are not considered to result in significant effects on the special qualities of the designated landscape. **Visual amenity** In summary, effects of the link pillars on the visual amenity of DVNL, and on views within its setting will relate to the occasional presence of groups of link pillars within wooden fencing being seen within the landscape. The features will be reasonably small, low lying and discrete and reasonably rural in appearance. The effects of these features on visual amenity will be minor and not significant, given their well-spaced and occasional nature. In some areas it may be possible to see several groups at the same time, but in this case those that are further away are likely to be barely perceptible, and generally speaking hedgerows and trees will provide a high level of filtering. They will be domestic scale features, which over time will

Reference	Question to	Question	Applicant's Response
			weather to better integrate with existing views. As such they are not considered to result in significant effects on visual amenity. **Sequential impacts** The Applicant notes there are no routes or series of routes that follow the length of the underground cables entirely. The longest section of a Public Right of Way (PRoW) running broadly alongside the proposed underground cable route is the Essex Way promoted long distance path. Potential views from the Essex Way are discussed below together with consideration of views from other routes. **Sequential impacts on people walking along the Essex Way** A section of the Essex Way, within DVNL north of Langham Hall, runs broadly parallel to the underground cable route for approximately 1.7 km, a distance that takes around 20–30 minutes to walk. A realistic worst-case scenario in terms of views could result in up to four groups of link pillars 800 m apart being seen from this section of the path. This is because the underground cable route may split to cross the River Stour to the north of Langham. There may therefore be a group related to the 'western' underground cable corridor and/ or another to the 'eastern' underground cable corridor. However, it is likely that intervening vegetation, and distance would restrict and reduce visibility in practice, given the low-lying nature and small scale of the features. Beginning east of Plumb's Farm on Water Lane, views to the east towards any link pillars from the Essex Way would be filtered and screened in places by existing mature field boundaries with hedgerows and trees, along with small areas of woodland. People walking along the Essex Way would cross over the underground cable corridor and may walk adjacent to a group of link pillars north of Alderton's Cottages. Views south from the Essex Way beyond Alderton's Cottages would be filtered and screened in places by intervening landform as topography rises to the south and the

Reference	Question to	Question	Applicant's Response
			Project heads to the south-east. Vegetation associated with Alderton's Cottages and woodland west of Martin's Farm would also filter and restrict some views. More open views would be available to the north of the Essex Way, where it crosses the Project and runs along the southern edge of the Order Limits, through the open fields south of Docura's Farm towards West Lodge. The Project heads slightly further north at this location, and therefore the Order Limits lie further to the north of the Essex Way. Any visible link pillars are likely to be set at a lower elevation due to landform sloping downwards to the north. Some filtering of views from the Essex Way is provided along the rural track to the east of West Lodge, by hedgerow boundary and by the occasional mature tree and by sloping landform. Further east, the Essex Way approaches and passes Primrose Wood, with Langham Hall to the south. Views from a short stretch of the Essex Way near Primrose Wood (approximately 330 m long) are open to the north and are seen from an increasing distance from the Project as the underground cable route heads north east and away from the footpath. The Essex Way then enters a field which is bound by a hedgerow to the immediate north of the path. This hedgerow filters and restricts views towards the Project. Approximately 150 m to the east along the inside boundary of this field the path takes a sharp turn south-west diverting up the steeper valley slopes towards Langham Hall and the Church of St Mary. As the path ascends the steeper slopes, there would be glimpsed views back over the valley to the north within which any link pillars would form very small components in a longer distance view. As the Essex Way approaches the church, views would become more contained due to existing woodland, and any link pillars would be screened by intervening vegetation.

Reference	Question to	Question	Applicant's Response
			Sequential impacts on people walking along the St Edmund Way/ Stour Valley Path A section of the St Edmund Way/ Stour Valley Path (both long distance paths following the same route in this part of DVNL), runs broadly parallel to the underground cable route and then crosses over it (potentially twice) over c.1.3 km. A realistic worst-case scenario in terms of views could result in four groups of link pillars 800 m apart being seen from this section of the path. This is because the underground cable route may split to cross the River Stour to the north of Langham. There may therefore be a group related to the 'western' underground cable corridor and/ or another to the 'eastern' underground cable corridor. However, it is likely intervening vegetation, and distance would restrict and reduce visibility in places. Beginning at the crossing of the River Stour, near Low Lift Cottages to the north-west of Langham, views of the link pillars from the St Edmund Way/ Stour Valley Path would be initially screened by woodland, trees and hedgerow associated with the river corridor and properties. As people walk along the path, from the River Stour, they would enter the field immediately east of Low Lift Cottages. There may be some views to a group of link pillars, approximately 400 m south, across open, flat arable fields, seen from a short stretch of the path approximately 240 m long, which would take around five minutes to walk. At this distance the link pillars and associated timber fencing would form very small, low-lying components in views. Travelling east, into the next flat arable field, views to the south would be filtered by the field boundary hedgerow. Views to the east would also be filtered by the field boundary hedgerow together with trees along a private access, to the immediate west of the underground cable corridor. The Project has been designed such that these trees would be retained. To the east of the private access, people walking along the path could cross over the 'western' underground cable corridor and may walk

Reference	Question to	Question	Applicant's Response
			adjacent to a group of link pillars (if the Project adopts this route). Views to the north are filtered by existing hedgerows that would be replaced post construction, therefore views of any link pillars to the north would be filtered. Views to the south are open across the immediate flat field, but hedgerows would filter views of the cable corridor beyond this field. The path continues along the northern edge of arable fields before crossing the route of the 'eastern' underground cable corridor (if the Project adopts this route). At this point cables would be installed via trenchless crossing techniques and therefore any link pillars in the flat arable field to the south would be no closer than 100 m and would be viewed against the backcloth of the southern field boundary hedgerow (which would be replaced post construction). Views to the north would be filtered by vegetation along the banks of the River Stour which would be retained. Beyond the 'eastern' underground cable corridor the path continues along the southern side of the River Stour. Views to the north would continue to be filtered by vegetation and views to the south would also be restricted by a block of woodland. **Sequential impacts on people cycling along National Cycle Network route 1** People cycling along National Cycle Network 1 (NCN1), travelling east, would cycle down Grove Hill from Langham and across Black Brook towards DVNL before crossing over the underground cable route on Rectory Road at the edge of DVNL. Hedgerows would be replanted along Rectory Road following installation of the cables, therefore views of any link pillars located close by would be filtered. People cycling along NCN1 would continue along a series of local roads for approximately 3.8 km (around 15 minutes) before potentially having glimpsed views of link pillars again through gaps in the hedgerow north of Higham Road. Views to the south of Higham Road would be restricted by an existing hedgerow and other intervening tree cover as this section of cable is proposed to be installed via trenchless crossing.

Reference	Question to	Question	Applicant's Response
			Sequential impacts on people walking along PRoW People walking along the PRoW network could on occasions cross over the underground cable route and/or run broadly parallel to it for short distances. This includes people walking on three short sections of PRoW accessed off Dedham Road to the south-west of Langham and another short PRoW that starts at the east side of the A12 and continues east to Boxhouse Lane near Parney Heath. People walking along these PRoWs may see one cluster of link pillars in close views, except for Essex Footpath 18 which broadly follows the underground cable route alignment down the valley side and is approximately 440 metres long (around ten minutes' walk). In the north this PRoW connects to the Essex Way and to the south, Dedham Road. Based on the realistic worst-case scenario, people walking on this PRoW may walk adjacent to a group of link pillars at either the southern or northern end of the PRoW. It is unlikely that more than one group would be seen from any one point on the PRoW due to the distance between groups and intervening vegetation and landform. Views to the east from the southern end would be filtered by hedgerows lining Dedham Road. Views to the north-east from the northern end would also be screened by interviewing hedgerow.
LV 2.6	The Applicant	Cumulative Landscape and Visual Assessment – methodology ES Chapter 17 Cumulative Effects [APP-281] describes the methodology used to assess the significance of potential inter-project cumulative effects, with significance criteria set out in table 17.6. Explain how the significance criteria in table 17.6 has	Paragraphs 17.5.18 to 17.5.20 and Table 17.6 in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** set out the significance criteria for inter-project cumulative effects. The significance criteria were not derived from the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)[19]. Instead, a standardised approach (as per many other Nationally Significant Infrastructure Projects) across all environmental topics was applied, as set out in Chapter 5 of **6.19 Scoping Report [APP-296]** and agreed within **6.20 Scoping**

[19] The Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Reference	Question to	Question	Applicant's Response
		been determined, taking into account guidance set out in Guidelines for Landscape and Visual Impact Assessments (3rd Edition, 2013) (GLVIA3) with particular reference to susceptibility, value, size or scale of the effect, geographical distribution and duration.	**Opinion [APP-297]**. In addition, as set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** the significance of cumulative effects was also informed by an understanding of the residual effects identified in each environmental topic chapter of the Environmental Statement. The identification of these residual effects applied the standard criteria from GLVIA3, as explained below. The methodology for the Landscape and Visual Impact Assessment (LVIA) in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** was developed in accordance with the principles contained within GLVIA3. As noted in paragraph 13.4.11 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** the level (and significance) of landscape and visual effects was judged with reference to the sensitivity of the receptor, which considers both **susceptibility** and **value**, and the magnitude of effect, which considers a combination of judgements including **size/scale**, **geographical extent**, **duration** and **reversibility**. The sensitivity (informed by susceptibility and value) of landscape and visual receptors considered in the cumulative assessment is the same as identified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. As set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** the significance of cumulative effects was informed by an understanding of the residual effects identified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** as well as the residual effects which would result from the other development/s, where this information was available. A significant cumulative effect was identified where it was deemed that there would be a significant magnification of effects on landscape and visual receptors that were already predicted to occur.

Reference	Question to	Question	Applicant's Response
LV 2.7	The Applicant	Cumulative Landscape and Visual Assessment – response update ES Chapter 17 17.5.59 [APP-281] states "all effects anticipated to be significant for Landscape and Visual are no worse than already identified in Chapter 11: Landscape and Visual". Provide further explanation and confirm if this is still the case following the update [REP4-163] to the cumulative assessment.	The sentence *'all effects anticipated to be significant for Landscape and Visual are no worse than already identified in Chapter 11: Landscape and Visual'* used in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** means that the significant cumulative effect that has been concluded is also a significant effect in **6.13 Environmental Statement Chapter 13 – Landscapeand Visual [APP-226]**, i.e. the residual effect of the Project on a particular receptor in isolation is assessed as being significant and the inter-project cumulative effect of the Project with other development is also assessed as being significant. The Applicant confirms that this is still the case following the updated cumulative assessment in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. The cumulative assessment considers the addition of the Project where other developments are assumed to be present in the landscape. Although the total cumulative effect of all projects would be more extensive, the addition of the Project would not be made worse by virtue of other developments being present.
LV 2.8	The Applicant	Cumulative Landscape and Visual Assessment - landscape The ES Chapter 17 Cumulative Effects Response Update [REP4-163] newly identifies 14 other existing and approved developments that have the potential to have significant cumulative effects on landscape and visual receptors, in addition to those already identified in the ES Chapter 17 [APP-281]. Where significant cumulative effects on landscape character have been	An assessment of inter-project cumulative effects, due to clusters of other development being assumed present, together with the Project is provided in Table 17.7 in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** and updated in Table 2.2 in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. This considers where the Project, in combination with two or more other developments, could give rise to cumulative effects on a common receptor, e.g. Landscape Character Area (LCA) or Landscape Character Type (LCT). The following LCAs and LCTs were identified as having the potential to experience a significant (moderate or major) cumulative effect during operation as a result of clusters of development being

Reference	Question to	Question	Applicant's Response
		identified, particularly where clusters of other developments are considered, are there locations where key characteristics of the landscape character change or landscape character could be transformed into a different landscape type? If so, what mitigation measures have been considered? If not, explain why. In the response provide a plan which illustrates the locations of the Landscape Character Areas (LCA) / Landscape Character Type (LCT) and Visual Receptor Areas (VRA) that would experience significant cumulative effects.	present in the landscape at the same time. Further consideration has been given below to whether this would change the key characteristics of the landscape or result in a change in landscape character type. • **LCA B1: Tas Tributary Farmland** – A cluster of development is proposed between Norwich Main Substation and Newton Flotman, comprising the Project, the westerly extension of the substation, offshore wind farms connecting into the substation via underground cable, battery storage and a solar farm. Should all of these proposed developments be built, effects would be **moderate adverse and significant** during operation (and maintenance) within a localised area in the north of the LCA, between the A47 and Newton Flotman and in the south of the LCA around Forncett St Peter. Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because the landscape is already influenced by development of the nature proposed, including Norwich Main Substation and existing overhead lines, and because of the nature and scale of the other development proposed, some of which is underground cable which would be restored post-construction. • **LCA D1 Wymondham Settled Plateau Farmland** – A cluster of development is proposed in the south and east of the LCA, comprising the Project, solar farms and energy storage systems. Should all of these proposed developments be built, effects would be **moderate adverse and significant** during operation (and maintenance) within localised areas in the east of the LCA, south of Bracon Ash and east of Mulbarton, and east of Fundenhall. Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the nature and scale of the

Reference	Question to	Question	Applicant's Response
			other development proposed, and the geographical separation between projects. Although Tasway Energy Park is a large scale proposal across many geographical areas, with the potential to result in a change to the underlying landscape type, only a small part of this is within the Wymondham Settled Plateau Farmland LCA. • **Rolling Valley Farmlands and Furze LCT** and **Ancient Plateau Claylands LCT** – A cluster of solar farm development is proposed between Wortham and Palgrave (south of the Waveney Valley) and between Gislingham and Thrandeston, mainly within the Ancient Plateau Claylands LCT and extending into the fringes of the neighbouring Rolling Valley Farmlands and Furze LCT. Should all of these proposed developments be built, effects would be **major adverse and significant** during operation (and maintenance). Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is due to the nature and scale of the development proposed, and effects being localised to the west of Palgrave and west of Mellis. • **Ancient Plateau Claylands LCT** and **Rolling Valley Farmlands LCT** – A cluster of development is proposed in proximity to Bramford Substation including the Project, Bramford to Twinstead (DCO2) and solar farm/battery storage (BMS31, BMS52, BMS68, BMS42 and BMS70). Effects would be **moderate adverse and significant** during operation (and maintenance) within a localised area around Bramford Substation, broadly between Flowton, Burstall and Bramford. Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the nature of the receiving landscape, which is already influenced by industrial

Reference	Question to	Question	Applicant's Response
			development and electricity infrastructure, including Bramford Substation and numerous overhead lines. • **Plateau Claylands LCT** – There are several solar farm developments proposed on the fringes of the LCT, north of Gislingham and north of Forward Green. Effects would be **moderate adverse and significant** during operation (and maintenance) within localised areas in the north of the LCT around Gislingham and in the south of the LCT around Forward Green. Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the nature and scale of the development proposed and the geographical separation between projects. • **Bromley Heaths LCA** – A cluster of development is proposed in proximity to the East Anglia Connection Node (EACN) substation, including the North Falls Substation (DCO9), Five Estuaries Substation (DCO8), Tarchon Interconnector (DCO15) and battery storage adjacent to Lawford Substation (T3). Elsewhere in the LCA there would be a western extension to Martells Quarry (ECC27), a food storage and distribution facility to the east of the A12 (T17) and erection of an asphalt plant east of Old Ipswich Road North (T34). Effects would be **major adverse and significant** during operation (and maintenance). Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the nature of the receiving landscape, which is relatively flat, and the mitigation proposed as part of the Project, North Falls Substation and Five Estuaries Substation, which would filter and screen views towards the substation infrastructure in the long term.

Reference	Question to	Question	Applicant's Response
			• **Great Tey Farmland Plateau LCA** – A cluster of development is proposed between Marks Tey and Eight Ash Green, comprising the Project and residential development north of Marks Tey (EA17) and west of Eight Ash Green (CO44 and EA30). Effects would be **major adverse and significant** during operation (and maintenance). Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the nature and scale of the development proposed, which would form an extension to existing urban areas, and the geographical separation between projects. • **LCA B1: Central Essex Farmland** – There are clusters of development within geographically distinct areas across the large LCA. Between White Notley and the Blackwater Valley these would comprise the Project, a solar farm south of Silver End near Rivenhall (B8), a solar farm and associated infrastructure and grid connection, east of White Notley (B42), greenhouses and solar energy provision at Rivenhall Airfield (ECC35) and a waste recycling facility east of Silver End (ECC39). Effects would be **moderate adverse and significant** during operation (and maintenance). Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the geographical separation between projects and the nature of the receiving landscape, parts of which have been modified by quarrying. • **LCA B1: Central Essex Farmland** – East of Great and Little Waltham and north of Chelmsford there is another cluster of development including a large solar farm (DCO13), residential developments (CH26, CH28, EA46), commercial and residential development (CH24), Chelmsford North East Bypass highways

Reference	Question to	Question	Applicant's Response
			works, south of Chatham Green (CH17), and part of an agricultural reservoir (ECC13 and ECC19). Effects would be **moderate adverse and significant** during operation (and maintenance). There would be a change to some of the key characteristics of the landscape if all of the developments were present, and part of the landscape character type would change from farmland to urban and industrial, particularly as a result of the large solar farm proposal (DCO13) and planned residential and commercial development north of Chelmsford (CH26, EA46). This is due to the relative scale and extent of these proposals. The Project would contribute to the significant cumulative effect on landscape character identified in this location, although it is not considered that the Project alone would result in a change in landscape character type. This is because the Project would not change the scale or pattern of the underlying landscape and the existing landcover would continue underneath the overhead line. There would also be some separation between the Project and the cumulative developments. • **LCA D2: Brentwood Hills** – A cluster of development is proposed in the south of the LCA between West Horndon and the eastern edge of the LCA, comprising the Project, Dunton Hills Garden Village (A3 (BrBC) and BR2) and a solar farm (BA13). Effects would be **moderate adverse and significant** during operation (and maintenance). Although there would be a change to some of the key characteristics of the landscape if all of the developments were present, this would not result in a change to the landscape character type. This is because of the location of the proposed developments, which would be on the periphery of a much larger landscape character type. • **LCA 13: Dunton Settled Claylands** – The LCA currently comprises a small area of predominantly open farmland to the west of Basildon. A cluster of development is proposed within

Reference	Question to	Question	Applicant's Response
			the LCA, comprising the Project, residential development (BA6, BA24 and EA57), a solar farm (BA13), battery storage facility (BA20) and employment development (EA58 and EA59). Residential and commercial development at Dunton Hills Garden Village (A3 (BrBC) and BR2) is proposed in the neighbouring LCA to the west. In the scenario that all of these developments were present in the landscape, effects would be **major adverse and significant** during operation (and maintenance). There would be a change to some of the key characteristics of the landscape if all of the developments were present, and part of the LCA would change from farmland to urban and industrial, effectively extending the settlement boundary of Basildon to the west. The Project would contribute to the significant cumulative effect on landscape character identified in this location, although it is not considered that the Project alone would result in a change in landscape character type. This is because the Project would not change the scale or pattern of the underlying landscape and the existing landcover would continue underneath the overhead line. • **LCA H1: East and West Tilbury Open Undulating Farmland** – A cluster of development is proposed in proximity to the proposed Tilbury North Substation, including the Lower Thames Crossing (DCO3), residential development (TH12, TH30 and TH40), mineral quarrying (TH22) and a gas power station (TH18). In the scenario that all of these developments were present in the landscape, effects on landscape character would be **major adverse and significant** during operation (and maintenance). There would be a change to some of the key characteristics of the landscape if all of the developments were present. Although there are noticeable urban influences in the landscape (including existing overhead lines, gravel extraction operations, and residential and industrial development) the landscape has a semi-rural and open character, parts of which

Reference	Question to	Question	Applicant's Response
			would be changed to one which is more urban. These localised changes in character type would result primarily from the introduction of the Lower Thames Crossing and proposed residential developments east of Chadwell St Mary and east of Southfields. This is due to the relative scale and extent of these proposals. The Project would contribute to the significant cumulative effect on landscape character identified in this location, although it is not considered that the Project alone would result in a change in landscape character type. This is because the Project would not change the scale or pattern of the underlying landscape, and the existing landcover would continue underneath the overhead line. For figures which illustrate the locations of the LCAs/LCTs and VRAs, respectively, that would experience significant cumulative effects please refer to **Cumulative Effects on Landscape Character Areas and Types** (Appendix E1) and **Cumulative Effects on Visual Receptor Areas** (Appendix E2) As noted in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** no additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in **6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]**. National Policy Statements EN-1 (2024) and EN-5 (2024) do not require that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects.
LV 2.9	The Applicant	Cumulative Landscape and Visual Assessment – Visual a) Have cumulative Zones of Theoretical Visibility been used to inform the assessment of cumulative visual impacts? If so, provide these.	a) The inter-project cumulative assessment in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and update in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** was not informed by cumulative Zone of Theoretical Visibility (ZTV) plans. This is considered to be a

Reference	Question to	Question	Applicant's Response
		If not, explain how cumulative visual effects have been identified. b) How have the sequential visual effects upon visual receptors on important linear routes been considered in the cumulative assessment? Which routes will have significant cumulative effects, and which of these routes pass through the National Landscape? c) Where significant cumulative effects have been identified what mitigation measures were considered? d) Provide a 'journey scenario' based assessment for the important linear routes, including plans and cumulative photomontages.	proportionate approach and corresponds with the approach taken on other Nationally Significant Infrastructure Projects including Bramford to Twinstead and the Lower Thames Crossing. Additionally, given the flat to gently undulating nature of the landscape, as well as layers of vegetation including trees, hedgerows and woodland, cumulative ZTVs would not be particularly informative as they would likely over-estimate the extent of cumulative theoretical visibility. The cumulative assessment was informed by information collated about the other developments, including location, proposed design, proposed programme and the findings of the environmental assessment / appraisal, where this information was available. ZTVs for the cumulative projects were reviewed and compared with the Project ZTV, where this information was available. This gave the Applicant an understanding of where there would be a potential overlap in visibility, and therefore the potential for a significant effect to arise. If a ZTV was not available, the Applicant relied on information relating to the location and proposed scale of the development, using professional judgement, informed by field work, to understand whether visibility might overlap. As set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**, the significance of cumulative effects was informed by an understanding of the residual effects identified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** as well as the residual effects identified for the cumulative development, where this information was available. A significant cumulative effect was identified where it was determined that there would be a significant magnification of effect on a landscape or visual receptor that was already predicted to occur as a result of the Project. b) and d) The Applicant understands a 'journey scenario' to be the same as a sequential assessment of effects on routes and so has provided a combined response to points (b) and (d).

Reference	Question to	Question	Applicant's Response
			Effects on visual receptors, which includes pedestrians, cyclists and horse riders using linear routes such as footpaths, bridleways, cycle routes and minor roads, were considered as part of the assessment of effects within Visual Receptor Areas (VRA) and at viewpoints as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Parts 1 to 4 of 4 [APP-229 to APP-232]**. Details of the areas likely to be affected within each VRA are provided in the description of the significance of effect. Sequential visual effects on users of long distance walking and cycle routes are set out in Section 13.12 of **6.13.A3 Appendix 13.3 Visual Baseline and Assessment - Parts 1 to 4 [APP-229 to APP-232]**. Significant sequential effects were identified from a number of routes. Cumulative effects on visual receptors within VRAs, which includes users of long distance walking and cycle routes, are set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and update in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163].** As set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** the significance of cumulative effects was informed by an understanding of the residual effects identified in the Landscape and Visual Impact Assessment (LVIA). Cross referencing between the sequential assessment of effects on long distance walking and cycle routes in **APP-229 to APP-232** and the cumulative assessment in **APP-284** and **REP4-163** is provided below to set out where there is the potential for a significant cumulative effect on users of important linear routes. VRAs, long distance walking and cycle routes and cumulative developments are identified on the figure in **Appendix E**. The **St Edmund Way**, **Stour Valley Path** and **Essex Way** are all partly within Dedham Vale National Landscape. There are no significant effects on views from the **St Edmund Way** or **Stour**

Reference	Question to	Question	Applicant's Response
			Valley Path during operation, therefore there is no potential for sequential cumulative visual effects from these routes. Views from the **Essex Way** are considered further below. The **Angles Way** is located in VRAs A11 Fen Street, A12 Roydon and Diss and B1 Wortham. Users of the Angles Way would pass in proximity to the entrance to a proposed solar farm (BMS44) in Diss, although the solar panels themselves would be over 1 km to the south. No significant cumulative visual effects were identified in VRAs A11, A12 and B1 in proximity to the Angles Way and therefore there would be no significant cumulative effects on users of the route. The **Middy Railway Footpath** is located in VRA B4 Finningham and Gislingham, VRA B5 Wickham Skeith and Mendlesham, and VRA B6 Stowupland. No significant cumulative visual effects were identified in these VRAs in proximity to the Middy Railway Footpath and therefore there would be no significant cumulative effects on users of the route. The **Mid Suffolk Footpath** is located in VRA B5 Wickham Skeith and Mendlesham and VRA B6 Stowupland. No significant cumulative visual effects were identified in these VRAs in proximity to the Mid Suffolk Footpath and therefore there would be no significant cumulative effects on users of the route. The **Gipping Valley River Path** is located in VRAs B8 Stowmarket, B9 Needham Market, B13 Somersham and C3 Ipswich West, Bramford and Sproughton. Users of the Gipping Valley River Path would pass in proximity to the Gateway 14 development (BMS47) on the eastern edge of Stowmarket. Further south, users of the route would pass in proximity to proposed residential development on the western edge of Ipswich (BMS27, BMS49). No significant cumulative visual effects were identified in relation to these developments, due to their distance from the Project and neighbouring urban context. Therefore, there would be no

Reference	Question to	Question	Applicant's Response
			significant cumulative effects on users of the Gipping Valley River Path. The **Essex Way** is located in VRAs C8 Higham, C9 Stratford St Mary and Dedham, C10 Dedham Heath, C11 Langham (on the boundary), D1 Tye Green and Boxted, D3 Great Horkesley and Horkesley Heath, D6 West Bergholt, Fordham Heath and Eight Ash Green, D5 Fordham, D7 Fordstreet and Aldham, D8 Great Tey, E1 Coggleshall, E4 Silver End (outer boundary), E5 Black Notley and White Notley, E6 Terling and Witham, F2 Peverel's Farm, F1 Great Leighs, F3 Great Waltham and F5 Chignall Smealy. The Essex Way passes through the Dedham Vale National Landscape within VRAs C8, C9, C10, C11, and D1. No significant cumulative visual effects were identified in these VRAs in proximity to the route and therefore there would be no significant cumulative effects on users of the Essex Way within the National Landscape. The Essex Way crosses the Project Order Limits to the east of Great Horkesley. To the south of Great Horkesley the Essex Way would pass in proximity to proposed residential development at Horkesley Heath (CO30 / CO31); no significant cumulative visual effects were identified within this area due to the nature of the cumulative development and undergrounding of the Project to the north. The Essex Way crosses the Project Order Limits near the River Colne where it would also pass in proximity to a river restoration project at Fiddlers Hill Meadow (CO9); no significant cumulative visual effects were identified within this area due to the nature of the cumulative development. The Essex Way would pass to the north of greenhouses and solar energy provision at Rivenhall Airfield (ECC35), a waste recycling facility west of Silver End (ECC39) and Rivenhall Integrated Waste Management Facility and Energy Centre (DCO14), crossing the proposed access to these developments. Significant cumulative

Reference	Question to	Question	Applicant's Response
			visual effects were identified in relation to ECC35 in VRA E1 Coggeshall and VRA E4 Silver End, including on users of the Essex Way, due to the introduction of both schemes seen alongside each other in this area, both of which include electrical infrastructure. Effects relating to ECC39 and DCO14 were not concluded to be significant due to the nature of the other development. There would be a significant cumulative effect on users of the Essex Way in VRAs E1 and E4. Where the Essex Way passes to the north-west of Silver End, there would be several proposed residential developments in proximity (B30 and B46); no significant cumulative visual effects were identified within this area due to distance and/or the nature of the development proposed. East of White Notley the Essex Way would pass in proximity to a proposed solar farm (B42); significant cumulative effects were identified in VRAs E4 Silver End and E5 Black Notley and White Notley due to the proximity of the solar farm (B42) to the Project. There would be a significant cumulative effect on users of the Essex Way in VRAs E4 and E5. South of Fuller Street the Essex Way passes to the north of the proposed Longfield Solar Farm (DCO13). Significant cumulative effects on visual receptors are identified within VRA F2 Peverel's Farm and from the western edge of VRA E6 Terling and Witham as a result of the Project in addition to Longfield Solar Farm (DCO13). Therefore, there would be a significant cumulative effect on users of the Essex Way in VRAs E6 and F2. Around Little Leighs the Essex Way would pass in proximity to the proposed Chelmsford Northeast Bypass; no significant cumulative visual effects were identified within this area due to distance and/or the nature of the development proposed. The **Saffron Trail** is located in VRAs F3 Great Waltham, F4 Little Waltham, F5 Chignall Smealy, F6 Chelmsford North-West and F8

Reference	Question to	Question	Applicant's Response
			Writtle and Chelmsford West. No significant cumulative visual effects were identified during operation in VRAs F3, F5, or F6. Although significant cumulative visual effects were identified within VRA F4, related to the Project and the Chelmsford Northeast Bypass (CH17), these would not be experienced by users of the Saffron Trail. This is because the section of the route within the VRA is over 3.5 km from the Project and Chelmsford Northeast Bypass (CH17) at its closest point. The **Centenary Circle** is located in VRAs F4 Little Waltham, F6 Chelmsford North-West, F8 Writtle and Chelmsford West and F10 Hylands Park. No significant cumulative visual effects were identified within VRAs F6, F8 or F10. Although significant cumulative visual effects were identified within VRA F4, related to the Project and the Chelmsford Northeast Bypass (CH17) these would not be experienced by users of the Centenary Circle due to distance. **St Peter's Way** is located in VRAs G1 Ingatestone and Fryerning and F11 Margaretting and Stock. No significant cumulative visual effects were identified within G1 or F11 and therefore there would be no significant cumulative effects on users of the route. **NCN Route 1** is located in VRAs C2 Washbrook, C4 Chattisham, C5 Capel St Mary, C6 Raydon, C8 Higham, C9 Stratford St Mary and Dedham, C10 Dedham Heath, C11 Langham, D3 Great Horkesley and Horkesley Heath, F7 Roxwell and F8 Writtle and Chelmsford West. No significant cumulative visual effects were identified within VRAs C2, C4, C5, C6, C8, C9, C10, D3, F7 and F8. Users of NCN Route 1 within VRA C11 would travel directly under the Project along Langham Lane but would be approximately 1.6 km west of a food storage and distribution facility (T17) at the closest point. No significant cumulative visual effects are identified in relation to the Project in addition to this development, due to its distance from the Project and intervening vegetation. Therefore,

Reference	Question to	Question	Applicant's Response
			there would be no significant cumulative effects on users of NCN Route 1. **NCN Route 13** is located in VRAs D5 Fordham and D6 West Bergholt, Fordham Heath and Eight Ash Green, F11 Margaretting and Stock, G2 Billericay West, G5 Little Burstead and H4 Stanford-le-Hope. No significant cumulative visual effects were identified within VRAs D5, F11, G2, G5 or H4. Significant cumulative effects are identified in VRA D6. Users of NCN Route 13 in VRA D6 would pass along Fiddler's Hill which lies to the north of the proposed residential development land off Halstead Road (EA14 (CO)) / Land off Foxes Corner at Halstead Road (CO44). Users would also pass along Mill Road in the Colne Valley to the north of the proposals. Intervening woodland, roadside vegetation, landform and existing residential development would screen and filter some views and significant cumulative visual effects on users of NCN Route 13 resulting from the Project and CO44 are not anticipated. **NCN Route 16** is located in VRAs E5 Black Notley and White Notley, E6 Terling and Witham, and F1 Great Leighs. No significant cumulative visual effects were identified within VRA E5 or F1. Significant cumulative visual effects were identified on the western edge of VRA E6, related to the Project and Longfield Solar Farm (DCO13) due to the introduction of both schemes seen alongside each other in this area; however, these would not be experienced by users of NCN Route 16. This is because the section of the route within the VRA is almost 2.5 km from Longfield Solar Farm (DCO13) at its closest point, with screening and filtering of views from intervening landform and existing vegetation, including mature trees and woodland. **NCN Route 30** is located in VRAs A12 Roydon and Di, B1 Wortham, B2 Palgrave, and B3 Mellis. No significant cumulative visual effects were identified within VRA A12. Significant cumulative visual effects are identified within VRA B1 due to proposed solar farm development (SN66, DCO16, BMS44 and BMS69).

Reference	Question to	Question	Applicant's Response
			Cumulative effects are however unlikely to be significant from NCN Route 30 within VRA B1. This is because the route follows the valley bottom along Ling Road in this VRA and views to other developments are unlikely due to a combination of distance and intervening landform and vegetation. Significant cumulative visual effects are also identified within VRA B2 due to proposed solar farm development (DCO16 and BMS63) and also within VRA B3 due to DCO16. Cumulative effects are unlikely from NCN Route 30 within VRAs B2 and B3. The route follows a network of local lanes in VRAs B2 and B3. These include Ling Road in the bottom of the Waveney Valley, Denmark Hill and Priory Road through Palgrave down to Mellis Road before the route deviates to the east, away from the Project, towards the A120. Views towards other developments are not likely due to a combination of distance and intervening landform and vegetation, particularly vegetation along the local lane network. Therefore, there would be no significant cumulative effects on users of NCN Route 30. **NCN Route 50** is located in VRAs E6 Terling and Witham, F1 Great Leighs, F2 Peverel's Farm, F3 Great Waltham, and F5 Chignall Smealy. Users of NCN Route 50 would pass in proximity to proposed residential development around Great Leighs (CH8), before crossing the Project Order Limits between Great Leighs and Fuller Street. Between Fuller Street and the A12 parts of the route would be in proximity to the proposed Longfield Solar Farm (DCO13). No significant cumulative effects are anticipated as a result of the Project in addition to CH8, due to the distance and limited intervisibility between the projects. Significant cumulative effects on visual receptors are identified within VRA F2 Peverel's Farm and from the western edge of VRA E6 Terling and Witham as a result of the Project in addition to Longfield Solar Farm (DCO13). Therefore, there would be a significant cumulative effect on users of NCN Route 50.

Reference	Question to	Question	Applicant's Response
			NCN Route 51 is located in VRAs B7 Forward Green and Creeting St Mary, B8 Stowmarket and B9 Needham Market. Users of NCN Route 51 would pass in proximity to the Gateway 14 development (BMS47) on the eastern edge of Stowmarket. No significant cumulative visual effects were identified in relation to the Project in addition to Gateway 14, due to the distance from the Project and neighbouring urban context. Therefore there would be no significant cumulative effects on users of NCN Route 51. The Applicant notes the request for cumulative photomontages however these have not been provided. This is considered to be a proportionate approach and corresponds with the approach taken on other Nationally Significant Infrastructure Projects including Bramford to Twinstead, Yorkshire GREEN and the Lower Thames Crossing. It is important to note that the cumulative assessment was based on first hand observations during site visits and not on viewpoints and visualisations alone. c) As noted in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** no additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in **6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]**. Although significant effects have been identified, it is not practicable to mitigate these through landscape mitigation measures, predominantly due to the scale of the works and the heights of the pylons. National Policy Statements EN-1 (2024) and EN-5 (2024) do not require that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects.
LV 2.10	The Applicant	Cumulative Landscape and Visual Assessment – Photomontages At ISH2 (on Wednesday 28th April) it was confirmed that no cumulative	**a)** The Applicant notes the baseline photography used for the Five Estuaries and North Falls cumulative photomontages provided at Deadline 4 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** was taken in 2023 and 2022

Reference	Question to	Question	Applicant's Response
		photomontages had been prepared for the proposed development. Cumulative photomontages from other projects (Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm) were provided at deadline 4 [REP4-303]. These cumulative photomontages submitted at deadline 4 are dated 2022 and 2023. a) Provide updated cumulative photomontages from these locations or justification for not doing so. b) Consider, assess and provide cumulative photomontages from other local locations where cumulative landscape and or visual effects are likely to occur	respectively. However, the cumulative photomontages were produced by Five Estuaries in April 2025 and North Falls in January 2025, as noted in the upfront revision information contained in their documents. These photomontages were specifically produced to illustrate the Norwich to Tilbury Project as a cumulative development as part of their respective Development Consent Order (DCO) examinations. The photomontages are based on the Norwich to Tilbury Project presented at statutory consultation. The DCO submission comprised some changes to the Project in relation to locations of pylons TB4, TB5 and TB6; however; these changes would be barely perceptible in the cumulative photomontages therefore they are a useful reference. The Applicant confirms that baseline views from these locations have not materially changed. The baseline photography is therefore considered to remain fair and valid for the purposes of cumulative photomontages. For example: • Norwich to Tilbury Viewpoint 3.13 presented in **7.12 Visualisations - Part 3 of 9 [APP-345]** (pdf page 131 to 134) is in a similar location to Five Estuaries Viewpoint 5 and North Falls Viewpoint 7. Five Estuaries Viewpoint 5 (10.34.6 VP5 Barlon Road near Little Bromley[20]) was submitted as a cumulative visualisation at Five Estuaries Deadline 5 and shows the Norwich to Tilbury Project. North Falls Viewpoint 7 (Public Right of Way near Little Bromley Hall, illustrated on pdf pages 74 to 76 in Appendix B of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**) was submitted as a cumulative visualisation at North Falls Deadline 4 and shows the Norwich to Tilbury Project. The Applicant notes that the baseline views have not materially changed • Norwich to Tilbury Viewpoint 3.19 presented in **7.12 Visualisations - Part 3 of 9 [APP-345]** (pdf page 148 to 150) is

[20] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-001272-Five%20Estuaries%20Offshore%20Wind%20Farm%20Ltd%20-%2010.34.6%20VP5%20Barlon%20Road%20near%20Little%20Bromley.pdf

Reference	Question to	Question	Applicant's Response
			in a similar location to Five Estuaries Viewpoint 9 and North Falls Viewpoint 8. Five Estuaries Viewpoint 9 (6.7.2.2.14 Figure 2.24a-c VP9 Essex Way Dedham Road[21]) was submitted as part of the Five Estuaries DCO application and does not show the Norwich to Tilbury Project. North Falls Viewpoint 8 (Essex Way, Dedham Road, illustrated on pdf pages 77 to 79 in Appendix B of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**) was submitted as a cumulative visualisation at North Falls Deadline 4 and shows the Norwich to Tilbury Project. The Applicant notes that the baseline views have not materially changed • Norwich to Tilbury Viewpoint 3.21 (submitted as part of **8.9.1.5 Additional Visuals for ExQ1 – LV 1.23 – Part 2 [Revision A]** at Deadline 5) is in a similar location to Five Estuaries Viewpoint 2 and North Falls Viewpoint 2. Five Estuaries Viewpoint 2 (Barn Lane PRoW, illustrated on pdf pages 49 to 50 in Appendix A of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**) was submitted as a cumulative visualisation at Five Estuaries Deadline 5 and shows the Norwich to Tilbury Project. North Falls Viewpoint 2 (Bridleway at Barn Lane illustrated on pdf pages 59 to 61 in Appendix B of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**) was submitted as a cumulative visualisation at North Falls Deadline 4 and shows the Norwich to Tilbury Project. The Applicant notes that the baseline views have not materially changed. **b)** The cumulative assessment undertaken for the Project is based on the application of professional judgement. It does not rely on visualisations or photomontages. The Applicant understands that the provision of cumulative photomontages may be beneficial for

[21] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-000355-6.7.2.2.14%20Figure%202.24a-c%20VP9%20Essex%20Way%20Dedham%20Road.pdf

Reference	Question to	Question	Applicant's Response
			decision makers and stakeholders, to illustrate how visual amenity may change in the vicinity of the East Anglia Connection Node. **Appendix F Cumulative Visualisations – Norwich to Tilbury, North Falls and Five Estuaries** is provided to illustrate the locations of viewpoint photography taken for the Project in combination with viewpoints taken for North Falls Onshore Substation (OnSS) and Five Estuaries OnSS, all of which illustrate the extent of cumulative developments of the three developments: Norwich to Tilbury Project; North Falls OnSS; and Five Estuaries OnSS.
LV 2.11	The Applicant	Cumulative Landscape and Visual Assessment – Bramford to Twinstead Overhead Line (OHL) The Scoping Opinion [APP-297] requires that particular consideration should be given to cumulative effects with Bramford to Twinstead. The cumulative assessment [APP-284] identifies major adverse and significant cumulative effects on landscape and visual amenity, both during construction and operation. In particular, significant adverse landscape effects are identified for Dedham Vale National Landscape during construction, despite it being outside of the Zone of Influence. Explain what additional mitigation has been considered and why it has been determined that no additional mitigation is required. Are there any other instances of significant adverse	The assessment included in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and also **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** identifies significant cumulative effects between the Project and Bramford to Twinstead on Dedham Vale National Landscape (DVNL) during construction. The eastern part of Bramford to Twinstead is outside the National Landscape but falls within the Zone of Influence, therefore this development has been considered in the cumulative assessment. Although the undergrounding works related to Bramford to Twinstead fall outside the Zone of Influence, the Applicant has taken a precautionary approach in line with the **6.20 Scoping Opinion [APP-297]** requirement that particular consideration be given to cumulative effects with Bramford to Twinstead. Both projects would impact the special qualities of DVNL during their construction phases of which there is a potential overlap, in time rather than local geographical area, between 2027 and 2028. No additional mitigation is proposed in relation to the identified significant cumulative effects on DVNL during construction. This is due to the fact that the Project and Bramford to Twinstead have both been designed to minimise effects on DVNL. Although the construction period of these projects may overlap by a year, they do

Reference	Question to	Question	Applicant's Response
		landscape or visual effects in areas outside of the Zone of Influence? If yes, explain the level and type of effect. If no, explain why.	not overlap geographically in the sense that they are distant from each other within DVNL, at approximately 6.3km apart. The Project has been designed with embedded mitigation measures as explained in Table 4.2 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. These include measures to minimise effects of the Project on DVNL, such as the proposal to underground the Project within DVNL and its setting, carfeul routeing through DVNL, minimising tree and hedgerow loss and a 3:1 tree replacement ratio. The approach to minimising tree and hedgerow loss is set out in the Applicant's response to ISH2 Action Point 36 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** and Section 3.11 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** also set out the approach to the design of the Project and measures to minimise effects on DVNL. The Applicant notes that Bramford to Twinstead was also designed to minimise effects on DVNL as set out in Table 4.2 of Bramford to Twinstead document 6.2.4 Environmental Statement[22]. Both the Project and Bramford to Twinstead will also apply construction good practice to mitigate potential effects. In relation to the Project, this is set out within Table 6.1 of **7.2 Outline Code of Construction Practice [Revision E]** and **7.3 Outline Construction Traffic Management Plan [Revision D]** Over and above the mitigation proposed by the Project, the Applicant is also proposing the funding of measures and projects to further the purposes of DVNL as identified in **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. This

[22] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020002-000578-6.2.4%20ES%20Chapter%204%20Project%20Description.pdf

Reference	Question to	Question	Applicant's Response
			will be secured by a section 106 agreement with Suffolk County Council and a draft of the agreement is provided at Deadline 5. There are no other instances of significant adverse landscape or visual effects in areas outside of the Zone of Influence as there are no other cumulative projects that would impact DVNL during construction.
LV 2.12	The Applicant	Residential Visual Amenity Assessment – 1 (RVAA) The RVAA [REP4-148] to [REP4-157] (inclusive) considers potential screening provided by existing vegetation and/ or tree cover within the surrounding landscape. The existing vegetation will in some places be altered, managed or removed as a result of the proposed development and can also change seasonally and over time. Therefore, the level of screening provided can be transitional. a) How may this affect the magnitude of change of visual amenity and the judgement regarding residential amenity? b) Are there any locations where changes to existing vegetation would increase the magnitude of change to visual amenity?	**Seasonal change** The assessment presented in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]** is based on likely views when vegetation is in a winter condition, to allow for consideration of the worst-case scenario. Where evergreen areas of planting have been mentioned within the assessment, it has been assumed that these will provide year-round screening or filtering of the Project. However, for all other areas of vegetation, the assessment assumes these would not be in leaf, and therefore visual filtering of the Project would be more limited. Therefore, further consideration of seasonal changes would not affect the magnitude of change of visual amenity or the judgement regarding residential amenity. **Alterations to existing vegetation as a result of the Project** Due to the scale of the Project and height of the proposed pylons, the effect of screening or filtering of the Project via vegetation reduces as its distance from a property increases. Therefore, vegetation which provides the most benefits in terms of screening or filtering the Project from the properties assessed is generally located within the property curtilages, or close to property boundaries. As a result, of the vegetation removal proposed in drawings **2.16 Trees and Hedgerows to be Removed and or Managed Plans [REP4-029 – REP4-035, Revision C]**, it is changes at the edges of the Order Limits, rather than closest to the Project centreline (where vegetation removal is more noticeable), which have the most potential to affect residential visual amenity.

Reference	Question to	Question	Applicant's Response
			The residence which would be most affected by the vegetation removal is expected to be property B1 (East Cottage), due to the proposed removal of a stretch of trees and hedgerow immediately adjacent to the property curtilage (and close to the building itself) along the south-western boundary (side elevation). Here, the reduced layering of vegetation along the south-western boundary would result in a slight increase in visibility of the base of the nearest proposed pylon. However, due to the vegetation along this boundary which sits within the property curtilage itself, orientation of the property, and unaffected views, the magnitude of effect, which is currently assessed as medium, is not expected to increase. No effects on other properties, as a result of the vegetation removal plans, are expected to be so great that they would change the magnitude of effect or judgement regarding residential visual amenity. Therefore, in respect of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]**: a) Alterations to the existing vegetation as a result of the Project, or through seasonal change, would not affect the magnitude of change of visual amenity and the judgement regarding residential amenity b) There are no locations where changes to existing vegetation would increase the magnitude of change to visual amenity.
LV 2.13	The Applicant	Residential Visual Amenity Assessment – 2 In the updated RVAA [REP4-148] Table A13.4.3, the following properties have been amended as not triggering Stage 4 assessment, although they have	Errors in Table A13.4.3 were amended in Revision B of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment – Part 1 [REP4-148]**, correcting the expected magnitude of effect for properties F5, F13, F14 and F32. **6.13.A4 Residential Visual Amenity Assessment [Revision C]** has been issued at Deadline 5 which now omits properties F5, F13 and F32 from Stage 4 of the assessment.

Reference	Question to	Question	Applicant's Response
		been included in the Stage 4 assessment, as per the original RVAA [APP-233]. • F5 (Albion House) • F13 (Larks Lodge and Annexe) • F32 (Inner Lodge) In addition, F14 (Rievers) has been noted in Table A13.4.3 as not triggering Stage 4 assessment, whereas in the original RVAA [APP-233] it did trigger Stage 4, although it was not taken forward to this stage assessment. Explain these discrepancies and update the document.	
LV 2.14	The Applicant	Mitigation hierarchy The applicant's response to various first written questions and confirmed at ISH2 considers that low height pylons are a 'step up' from the standard lattice pylons in the mitigation hierarchy, despite their price being in the same cost range (ExQ1 HE1.4 [REP3-074]) because of the generally additional consequences of the broader cross-arms of the lower pylons [REP4-302]. Provide further information on the differences between the two types of pylon and what differentiates them in the mitigation hierarchy. A graphical	The Applicant set out in its response to the Local Impact Reports (**8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, Chapter 2 from paragraph 2.5.6) the general basis for the application of the mitigation hierarchy. It is considered that the mitigation hierarchy is a broad concept, and its precise application needs to be considered in the context of the nature of the potential impacts being considered. The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse impacts on the environment depending on the context of the linear section of the route. There is also a sequential aspect to seek to avoid, prevent, reduce or off-set (see **6.5 Environmental Statement Chapter 5 - Environmental Impact Assessment Approach and Method [APP-135]** paragraphs 5.4.21 to 5.4.31)

Reference	Question to	Question	Applicant's Response
		representation of the applicant's view of the mitigation hierarchy would also be useful in this respect.	The starting position for pylon design choice is standard height steel lattice. However, low-height pylons are considered by the Applicant to represent a 'step up' over standard lattice pylons in certain circumstances when considering measures to apply at the 'reduce' tier of the hierarchy. The differences between the two types of pylon design can be described as follows: **Low height lattice pylon** • Lower in height than standard height lattice pylons which reduces the overall height of the transmission infrastructure and therefore reduces the vertical prominence of the overhead line within the landscape – in some locations this can reduce visibility, skyline intrusion and effects on landscape character and visual amenity when compared with a standard pylon design • Occupy a greater footprint, have wider cross arms and have a bulkier and denser profile than standard height lattice pylons requiring greater vegetation removal than a standard height lattice pylon • Depending on the design and terrain, low height lattice pylons due to being shorter structures, may require reduced span lengths compared to standard lattice pylons which may result in more pylons being needed along a route • Limited to 30-degree angle deviations **Standard height steel lattice pylon** • Taller in height than low height pylons which increases the vertical prominence of overhead line within the landscape, but

Reference	Question to	Question	Applicant's Response
			generally standard height lattice pylons have narrower cross arms which can reduce their horizontal spread in views and footprint on the ground • Require a narrower corridor for vegetation clearance than low height lattice pylons • Design provides the greatest flexibility as they can provide angle deviations up to 90 degrees, as opposed to low height pylons which are both limited to 30 degrees • Able to be easily extended where required to provide additional clearance above specific constraints such as navigable waterways • Can typically accommodate longer distances between pylons and therefore fewer structures may be required along a route reducing the features within the landscape • Consistent starting point ensures that the overhead line has a coherent appearance across the majority of a linear route which avoids visual impacts that can arise with multiple designs in close proximity Information, including example images and example dimensions, about the differences between standard height and low height pylons is provided in **7.21 Errata 2024 - Design Development Report for the Project Appendices [REP1-069]** in Section 2: Comparison of Alternative Pylon Types of Appendix C. **Locational specific circumstances that determine a 'step up' in mitigation hierarchy** The difference between the two pylon types is important in certain circumstances which determine the 'step up' from standard to low height pylons in the mitigation hierarchy. A decision to move from a standard height lattice pylon to a low height pylon is a professional

Reference	Question to	Question	Applicant's Response
			judgment call based on a range of considerations depending on the locational specific factors. Consideration is given to the use of low height pylons in circumstances where height is considered to be an important factor in reducing effects in sensitive locations, for example in relation to heritage effects near Great and Little Walthams. Although low height lattice pylons may reduce effects in certain circumstances where height is a strong consideration, they also occupy a greater footprint, have wider cross arms and have a bulkier and denser profile. They can therefore provide visual benefits in some scenarios, for example where a reduction in pylon height means that views of the tops of pylons are screened by intervening woodland. In other scenarios they can increase adverse visual effects, for example where relatively close to visual receptors without intervening filtering vegetation where they are likely to appear more noticeable in views from residential receptors. An example of this has been set out in a previous response from the Applicant to REP1-462 in **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, page 298. The application of the mitigation hierarchy for pylon design in general, can be represented conceptually as follows with the entry level being the use of standard lattice pylons with a step up to consider alternative pylon design (which includes low height pylons and T-pylons) with underground cable sitting at the top and considered where technically feasible and justified in accordance with policy.

Reference	Question to	Question	Applicant's Response
			Underground cable (where technically feasible and justified in accordance with policy) ↑ **Alternative pylon design** (e.g. Low-height pylons followed by T-pylons) ↑ **Standard lattice pylons** See above illustration of the 'step up' in mitigation hierarchy for pylon design. The Applicant is currently preparing a graphical representation of the 'step up' in mitigation hierarchy along similar lines as shown above (in a pyramid formation) for Deadline 6. In this hierarchy: • Standard lattice pylons represent the baseline overhead line solution in accordance with 'the strong starting presumption' for overhead lines in the NPSs • Alternative pylon design - represents a step up to reduce certain landscape and visual effects in certain circumstances but can equally remain a prominent above-ground feature where a sequential consideration is required • Underground cable solutions may provide the greatest reduction in landscape and visual effects because the transmission infrastructure is largely removed from view during operation, although they introduce different environmental effects and engineering constraints

Reference	Question to	Question	Applicant's Response
LV 2.15	The Applicant	Landscape viewpoints The applicant's response to ExQ1 LV1.6 [REP3-074] refers to viewpoints contained within the Diss and District Neighbourhood Plan. Confirm if and where the Roydon Key View 28 (from Darrow Land and Darrow Wood Lane) has been taken account of in your reasoning and viewpoint selection process. If not, consider providing an additional visualisation from this location or provide justification for not doing so.	The Applicant has previously responded to consultation feedback related to concerns about the Project impacting views from Key View 28 of the Diss and District Neighbourhood Plan in **5.1 Consultation Report [APP-066]** (reference number 9-3.179 on pdf page 1790). Within the response the Applicant confirmed that there was no landscape and visual viewpoint at this location and that the assessment of Visual Receptor Area (VRA) A10 Burston identifies significant effects on visual receptors in this location. An additional visualisation near the location of Diss and District Neighbourhood Plan Key View 28 (from Darrow Lane) is provided in **Appendix G LV 2.15** as requested by the ExA.
LV 2.16	All local authorities	Mitigation and compensation - 1 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. 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. Any other IP may also respond if they wish.	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
LV 2.17	The Applicant	Mitigation and compensation – 2 a) Provide a copy of the "voluntary agreement for enhancements outside of the DCO requirements, as took place on the Bramford to Twinstead DCO" (Point 8.2e, [REP4-302]) and the process and justification that led to this agreement. b) Provide any update on the referred to ongoing discussions taking place on the proposed development.	***Voluntary agreement for enhancements outside of the DCO requirements and the process and justification that led to this agreement*** Bramford to Twinstead (EN020002) contained the provision for some targeted landscape softening that was justified under paragraph 2.8.11 of the 2011 National Policy Statement (NPS) EN-5, which notes that landscape softening is voluntary. The Applicant refers to section 8.4.8 of the **Bramford to Twinstead Reinforcement 7.8 (D): Landscape and Ecology Management Plan (Issue D)** for the justification that led to the voluntary agreement: *'In addition, the National Policy Statement for Electricity Networks (EN-5) identifies additional planting that can be taken by projects. Paragraph 2.8.11 describes more specific measures comprising:* • *'Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and* • *Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.'* The Applicant also refers to section 8.4.9 of the of the **Bramford to Twinstead Reinforcement 7.8 (D): Landscape and Ecology**

Reference	Question to	Question	Applicant's Response
			Management Plan (Issue D) for the process of capturing the voluntary agreement: *'The Vegetation Reinstatement Plan in Appendix B identifies areas for potential 'landscape softening' which would provide screening from visual receptors. Although* *these softening areas are not required to offset a significant effect within the ES, the* *planting could soften the views of the project from specific properties identified in the* *community assessment. As noted in EN-5, the landscape softening would be discussed with the relevant landowners, who may choose to decline the landscape softening proposals.'* In summary, the voluntary targeted landscape softening was committed to in the Landscape and Visual Impact Assessment but did not mitigate any significant effects highlighted in the Environmental Statement (ES). The inclusion of such a provision was made to potentially help filter views of the overhead line from isolated properties close to the overhead line who could benefit from some planting. Planting was offered, and if landowners wanted the planting, this was secured by land agreements with a 5-year hedgerow maintenance period. The Applicant can confirm there has been mixed uptake as a number of landowners noted that they would prefer to have views across their property to remain open views and for security reasons. The Applicant cannot share individual voluntary agreements with landowners for reasons of commercial and personal confidentiality,

Reference	Question to	Question	Applicant's Response
			but the above provides a summary of the approach and the nature of the agreements with individual landowners. If the panel requires further details please ask and we will release that which is possible after taking advice. ***Update to the ongoing discussions taking place on compensation*** The Applicant has sought to clarify the Local Planning Authorities' requests for further landscape and visual compensation. Any such responses need to be considered against the NPS policy framework and the tests in Regulation 122 of the (CIL Regulations 2010). Notwithstanding the Applicant's position in relation to the requirement for landscape compensation set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specifical Hearing 2 [REP4-302]**, the Applicant requested further information on 31 March 2026 from all relevant Local Planning Authorities by e-mail, providing a deadline of 10 April 2026 for comments. A further e-mail was sent on 1 May 2026 to all Local Planning Authorities to reiterate the ask and provide further context and scope for the information request considering Action 27 from Issue Specific Hearing 2. The Applicant received responses setting out additional detail in relation to the asks from Suffolk County Council (which was also on behalf of Norfolk County Council and Babergh and Mid Suffolk District Councils); Essex County Council; and Thurrock Council. Therefore, responses have been received from the respective County Councils and Unitary Authority covering the full extent of the Project. A summary of the responses received has been provided below. • Suffolk County Council (also on behalf of Norfolk County Council and Mid Suffolk District Council) responded on 15 April 2026:

Reference	Question to	Question	Applicant's Response
			– Spreadsheet received detailing access and engagement deliverables requested in relation to the Waveney and Little Ouse Recovery project and Little Ouse Headwaters Project. • Suffolk County Council (also on behalf of Babergh District Council) responded on 12 May 2026: – Strategic landscape plan provided detailing measures such as access improvements, tree and hedge planting, biodiversity connectivity and request for consideration of additional matters. • Essex County Council responded on 21 May 2026: – Spreadsheet received detailing landscape planting and compensation/enhancement opportunities on a number of sites in Essex. • Thurrock Council responded on 6 May 2026: – E-mail received detailing compensatory planting in areas around the Tilbury substation and also in Maple Park. In addition to e-mail correspondence, engagement has included formal meetings with: • Suffolk County Council jointly with Norfolk County Council on the Waveney Valley • Suffolk County Council jointly with Babergh District Council on Bramford • Essex County Council which included a discussion on a variety of Local Authority sites they considered could be enhanced across the county • Thurrock Council on Tilbury • Suffolk County Council on the Gipping Valley

Reference	Question to	Question	Applicant's Response
			The engagement focused primarily on discussing and seeking to understand further the Local Planning Authorities' ideas for compensation, and, where possible, plans/sketches to show such measures. Discussion took place on how those measures aligned with existing Project commitments, e.g. Biodiversity Net Gain and 3:1 tree planting measures, etc., and how they aligned with topics of interest – landscape, ecology, amenity, heritage and archaeology set out and focused upon specific locations in ExQ1 LV 1.28.In each instance discussions alighted on landscape restoration and biodiversity connectivity as being important to the Local Planning Authorities. Discussions included reference to the Local Nature Recovery Strategies that were consulted upon nationally and which form part of local plans. Progress has led to the Applicant developing two sets of plans for each of the locations identified by the Examining Authority in ExQ1 LV 1.28. The first consists of a constraints plan identifying the principal local landscape, ecological, archaeological, heritage and public rights of way constraints and focussed on the relevant locations set out in ExQ1 LV1.28 and considered at the ISH2 in the detailed agenda. The second, a draft opportunities plan identifying our understanding of potential opportunities that could enhance the fabric of the existing local landscape and habitat connectivity e.g. hedgerow improvements to field/footpath boundaries. In addition, the Applicant has prepared equivalent material for the Tilbury North Substation area. Whilst this location was not specifically identified in ExQ1 LV1.28, Thurrock Council made representations regarding compensatory measures in this area, and the Applicant considered it appropriate to provide comparable information for the Examining Authority's consideration.

Reference	Question to	Question	Applicant's Response
			These plans have been shared with the Local Planning Authorities who responded to the Applicant and contributed to their production for comment, further meetings were also offered and arranged ahead of Deadline 5, where possible. The Applicant was able to meet with Suffolk County Council and Norfolk County Council to discuss the draft plans and show them to Thurrock Council during a meeting. The plans are submitted to the Examining Authority to meet our commitment to provide plans for each of the locations set out in ExQ1 LV 1.28. While the Applicant has engaged with the Local Planning Authorities on the matter of compensation, the Applicant continues to maintain the position set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The plans are illustrative in nature and should not at this stage be interpreted as representing commitments by the Applicant to deliver the measures shown. Nor should the draft opportunities plans be taken as indicating agreement by the Applicant that additional landscape or visual compensation is required, justified by policy, or necessary to make the development acceptable in planning terms. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010. The identification of a potential compensatory opportunity does not in itself demonstrate that the measure is necessary compensation for the Project in accordance with policy. The Applicant is seeking constructively to work with the authorities to answer the ExA's questions on this issue. The authorities are adopting the same positions. Whilst the Applicant's position remains that any requirement for landscape and visual compensation must be considered against the

Reference	Question to	Question	Applicant's Response
			relevant NPSs and applicable statutory tests, including Regulation 122 of the Community Infrastructure Levy Regulations 2010. This is a matter ultimately for the Secretary of State to consider and determine. This response should be read in association with **8.4.12.2 Responses to ISH2 Action Point 27 - Masterplans [Revision A]**.
LV 2.18	The Applicant	Landscape Assessment of the Colne Valley In your representation [REP4-380] you indicate that a landscape assessment report, commissioned by residents of the Colne Valley, may be submitted at deadline 5, or later. The ExA appreciate that this is a time-consuming exercise but remind you that deadline 6 (07 July) would be the last deadline for submission of such a document in order to give the applicant and others time to respond at deadline 7 and for the ExA to take on board their comments. Please confirm when such documentation is likely to be submitted.	This question is not directed at the Applicant.
LV 2.19	The Applicant	3D Visualisation Tool At deadline 4, both Villages Against Pylons [REP4-380], and Ardleigh and Little Bromley Parish Councils [REP4-319] provided photographs taken from a public consultation event. These appear to have been taken from a 3D	The Applicant acknowledges that a 3D visualisation tool was provided at the 2024 public consultation events. This provided a visualisation of the proposed pylon locations modelled on the 2024 statutory consultation design and therefore is not the same as the design presented in the application. The assessment of effects presented in the Environmental Statement is based on the accurate

Reference	Question to	Question	Applicant's Response
		Visualisation Tool. The ExA acknowledge the response you provided to Ardleigh and Little Bromley Parish Council in Appendix B of [REP4-319] and appreciate that these images may not have been worked up into industry-standard visualisations. However, the photographs submitted cover areas that have not been extensively covered by visualisations and, in the absence of formal visualisations, would therefore be of use to the examination. The applicant is asked to provide screenshots from the 3D visualisation tool from the locations identified in these two submissions.	and up-to-date Project information submitted as part of the Development Consent Order in 2025. The images (photographs) taken from the 3D visualisation model at the consultation event and shared in [REP4-380] and [REP4-319] are from Coney Byes Farm, Highlands Farm and Kings Hall near Fordham, and at various locations around Ardleigh, including from the edge of the settlement and the conservation area, and from the nearby reservoir. The screenshots provided in **Appendix H LV 2.19** are taken from the computer model produced for the 2024 statutory consultation events in relation to locations noted in the representations above. The images taken from the 3D model are identified using the paragraph numbers and headings used in the representations, where more than one image applies to a heading these have been noted by (a), (b). The datasets underpinning the 3D visualisation tool are derived from industry-standard sources (including ESRI terrain data at c.1 m resolution and BlueSky aerial and National Tree Map datasets). These sources provide a high level of positional accuracy. Prior to submission of the DCO, the model outputs were carefully checked against the submitted Visualisations and confirmed to align appropriately, demonstrating that the data and resulting visual representations were robust and reliable at that point in time. Any differences now observed between the previously submitted snips and current outputs are due to variations in dataset versions. Basemaps and vegetation datasets are periodically refreshed, and products such as aerial imagery and the National Tree Map represent time-specific captures. As a result, updates to vegetation extent, growth, or mapping, as well as changes to imagery, can lead to visible differences between outputs generated at different points in time, even where both are based on accurate and fit-for-purpose data.

Reference	Question to	Question	Applicant's Response
			It is important to note that the following disclaimer was applied to information presented at the 2024 statutory consultation events, and continues to apply for these images. ***'Disclaimer*** This model is a visualisation tool created to support National Grid's 2024 statutory public consultation on Norwich to Tilbury. *The model has been built using existing data sets. These data sets may change over time and this may affect the accuracy of the visualisation.* *The model is intended to be illustrative of our proposals and should be viewed in conjunction with other published consultation materials.* ***Guidance Notes*** ***Proposed Infrastructure*** *The proposed overhead line assets are presented based on the 2024 preferred draft alignment. Positioning and heights may vary in line with proposed Limits of Deviation.* *Cable sealing end compounds (CSECs) and substations have been presented as a representative design. Actual design and locations may vary in line with proposed Limits of Deviation.* *We have shown the proposed new National Grid connection between Bramford and Twinstead (BTNO) on the assumption that the project is granted development consent. The proposals are being examined by the Planning Inspectorate.* *Data sets for groundworks and excavation were not available.* ***Existing Infrastructure*** *Complete data sets are not available for all existing overhead line assets in the study area. Best efforts have been made to create a reasonable representation of the real world but in places this is limited to presenting generic pylon types at average heights.*

Reference	Question to	Question	Applicant's Response
			Generic designs and average heights have also been used to represent older sections of existing substations where detailed data is not available. *Buildings, including domestic properties, have been presented to illustrate their spatial location and footprint, rather than specific architecture. Building height shown is to eaves.* ***Vegetation*** *The National Tree map data set has been used to identify tree locations. The data set is limited to vegetation over three metres in height and does not record exact tree species. Regionally appropriate assumptions for typical tree species and structure have been made.* *The national tree map data set for hedges and vegetation under 3 metres in height has been used. Hedgerow heights have been averaged across clusters of similar height.* *Exact hedge species data is not available. Regionally appropriate assumptions for vegetation species have been used.* *We will need to manage vegetation during construction and for ongoing maintenance and the model shows all vegetation removed within 20m of the proposed overhead lines and pylons. This will be subject to detailed design.* *Indicative planting around new infrastructure has also been included.'*

11. Minerals and waste

Table 11.1 Minerals and waste

Reference	Question to	Question	Applicant's Response
MW 2.1	Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Contaminated Ground 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]**.	This question is not directed at the Applicant.
MW 2.2	The applicant Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Quarries and Minerals Plan Candidate Sites Please provide an update from ExQ1 on consideration of design and land use considerations in the vicinity of existing quarries and candidate sites.	The Project has a number of interfaces with both established quarries, and candidate sites identified by Essex County Council following a call for sites and presented in Review of Essex Minerals Local Plan 2014: Assessment of Sand and Gravel Sites (November 2023)[23]. The following presents an update from ExQ1. **Existing Quarries** SRC Sheepcote Quarry The position with the stakeholder has not materially changed since ExQ1. The stakeholder's concerns relate to the use of the access to the quarry and the potential shared arrangements with the Applicant. It is believed suitable shared crossing arrangements can be agreed to allow for safe and continuous quarry operations. The

[23] Essex County Council (2023) *Review of Essex Minerals Local Plan 2014: Assessment of Sand and Gravel Sites*.

Reference	Question to	Question	Applicant's Response
			current position is reflected in **8.3.31 Draft Statement of Common Ground - SRC Group (Sheepcote Quarry) [Revision C]**. Clearserve/Orsett Quarry Since ExQ1, the Applicant has set out an alternative scenario for the proposed Tilbury North Substation that better interfaces with development in the area. Further evolution of the interface with this site has been shared with the Operator and has been scheduled for discussion at a meeting on site on 8 June. The approach to alternative scenarios and the updated position is further set out in Table 2.15 of **8.11 Approach to Scenarios [REP4-310]**, submitted at Deadline 4. A draft Statement of Common Ground with the stakeholder was submitted at Deadline 4 (**8.3.9 Draft Statement of Common Ground - Clearserve Limited (CSL) [REP4-201]**). This is expected to be updated after the meeting in response to the outcome of discussions. Ingrebourne Valley The position with the stakeholder has not materially changed since ExQ1. The stakeholder's concerns relate to the impact of the haul road, the proposed scaffolding area and the pulling zone areas. The current position is set out in **8.3.30 Draft Statement of Common Ground - Ingrebourne Valley Limited [REP4-239]**. The Applicant is currently exploring options to reduce or remove the extent of the pulling areas required and understands this is the stakeholder's primary concern. **Candidate Sites** A number of candidate minerals sites have been identified and assessed by Essex County Council. The Assessment of Candidate Sand and Gravel Sites (November 2023) was subject to

Reference	Question to	Question	Applicant's Response
			consultation in parallel with the emerging Replacement Essex Minerals Local Plan 2025 to 2040 – Regulation 18 consultation draft (February 2024)[24]. The Assessment of Candidate Sand and Gravel Sites (November 2023) sets out the results of the assessments undertaken by Essex County Council to determine the suitability of the sites and therefore informs the process of deciding which sites should be allocated for quarrying development in an updated Minerals Local Plan. The Regulation 18 consultation draft Minerals Local Plan does not include a list of emerging or preferred sites for allocation. A list of potential allocations (Candidate Sites Assessments) was published with the consultation which set out a number of sites which, if allocated, would interact with the Order Limits and Study Area, including: • A86 Martells, North of Frating Road – West • A85 Martells, North of Frating Road – East • A79 Crown Quarry, North of Wick Lane • A47 Bradwell, Monk's Farm • A59 Lowleys Farm • A91 Land at Chignal St. James. An assessment of the Project against the emerging Essex Minerals Local Plan is included in **8.4.2 Policy Compliance Tracker [REP1-133]** (Page 381), submitted at Deadline 4. The text below summarises the updates to these sites since ExQ1.

[24] Essex County Council (2024) *Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 – Issues and Options)*

Reference	Question to	Question	Applicant's Response
			SRC Martell Minerals (A85 & A86) Since ExQ1, the Applicant has further developed its alternative scenario to minimise the interactions with the minerals site. The Applicant has sought to position the pylons as far north as practicable within the Limits of Deviation to minimise impacts within SRC's site. The alternative scenario is set out in **8.11 Approach to Scenarios [REP4-310]**, submitted at Deadline 4. A draft Statement of Common Ground has been agreed with the stakeholder (**8.3.28 Draft Statement of Common Ground - SRC Group (Martells Mineral Site A85 & A86) [Revision C]**). SRC Crown Quarry Minerals Since ExQ1, screening and scoping opinions (ESS/14/26/TEN/SPO and ESS/13/26/TEN/SO) for a northern extension to Crown Quarry for '*the extraction, processing, sale and distribution of sand and gravel and subsequent restoration using inert materials together with the necessary associated infrastructure and access improvements*', have been submitted to the local planning authority and are under consideration. The applications were submitted on 17 February 2026. Essex County Council issued their EIA Screening response on 27 March 2026 and adopted an EIA Scoping Opinion on 15 May 2026. The Applicant is reviewing mitigation options for pylon TB20 which is currently proposed to be situated within the existing quarry site. The Applicant is now committing to an alternative scenario to move the position of the pylon to better interface with the quarry site. The alternative scenario is outlined in **8.11 Approach to Scenarios [REP4-310]**, submitted at Deadline 4. A draft Statement of Common Ground has been agreed with the stakeholder (**8.3.29 Draft Statement of Common Ground - SRC Group (Crown Quarry mineral site A79) [Revision C]**).

Reference	Question to	Question	Applicant's Response
			Bradwell Monks Quarry (Blackwater Aggregates) (A47) The Applicant is reviewing its position on this site considering information received relating to an emerging allocation for a housing development and its proposed indicative layout plan. The option A alignment reduces the effects on housing but has increased effects on minerals resources sterilisation. The alternative option B reverses this balance. The Applicant is investigating whether there is scope to reduce the consequences for minerals sterilisation without materially changing the interface with the housing. A draft Statement of Common Ground that had been agreed with the stakeholder (**8.3.27 Draft Statement of Common Ground - Blackwater Aggregates (Bradwell Quarry) [REP4-233]**) will be updated following review of the design and engagement with relevant parties. Tritton Farming Partnership (Lowley's Farm) Since ExQ1, the Applicant has agreed a draft Statement of Common Ground with Tritton Farming Partnership, submitted at Deadline 4 (**8.3.32 Draft Statement of Common Ground - Tritton Farming Partnership and Brett Aggregates (Lowleys Farm Mineral Site) [REP4-243]**). The Applicant acknowledges the presence of a mineral deposit within the site at Lowley's Farm and that the design would potentially constrain or prevent the full extraction of this resource, and that as it currently stands the Project alignment would extend through the deepest point. It is considered not possible to fully avoid the mineral site within the Limits of Deviation, however it is possible to allow flexibility in the alignment to reduce the impact on the mineral site, should it be progressed. Widened Order Limits have been proposed in this location to allow for an alternative scenario that would reduce the impacts on the minerals site. This includes

Reference	Question to	Question	Applicant's Response
			the potential relocations of pylons TB128 to TB133 further to the south-east within the widened Order Limits. The stakeholder has provided the Applicant with site plans and information on extractable depths. Detailed routeing, pylon locations and pylon specifications for the Project have not yet been finalised, and the full extent of the impact cannot yet be determined. Further detail of the proposed Scenario B option is included in Table 2.6 of **8.11 Approach to Scenarios [REP4-310]**, submitted at Deadline 4. <u>A91 Land at Chignal St. James.</u> The location of the potential mineral extraction site is to the north of the Limits of Deviation and the Project's pylon alignment. The proposed access route for the minerals site intersects with the Project's Limits of Deviation in relation to the access via Boyton Hall from Roxwell Road A1060. The Project would not have any detrimental impact on potential future mineral operations for the site.
MW 2.3	The applicant Thurrock Council	Incidental extraction scheme Following comments and responses to ExQ1 [REP4-299] following Thurrock Council's proposal to consider an incidental extraction scheme, please update the ExA on the progress of discussions in this regard.	The Applicant is aware of Thurrock Council's concerns regarding the safeguarding of mineral resources and request for an incidental extraction scheme to be considered at Tilbury North Substation. Presently, further discussions with Thurrock Council on this matter have not progressed because to inform discussions it is necessary for the Applicant to produce an earthworks design, which needs to be informed by ground investigation surveys which begin this year. The Front End Engineering Design (FEED) for assessment was based on LiDAR data, with further topographical surveys required to be completed. Subject to confirmation of the above, it is expected the majority of material surplus (both topsoil and substrate) would be able to be reused on site (on a cut and fill basis) to raise the ground level of

Reference	Question to	Question	Applicant's Response
			the substation to the proposed finished floor level in the FEED design. The FEED design currently assumes the remaining excavated material would be deemed unsuitable for reuse and will be removed from the site. The results of the ground investigation surveys will determine its potential for reuse. The FEED design includes a large earth bund of 3 m in height to the west of the proposed substation platform and it is assumed the majority of excavated topsoil can be reused to form this earth bund (subject to classification testing), with any material surplus expected to be used around the site for landscaping.

12. Noise and vibration

Table 12.1 Noise and vibration

Reference	Question to	Question	Applicant's Response
NV 2.1	The Applicant	Noise & Vibration 1 The ExA notes ES Chapter 14 - Noise and Vibration [APP-256] states where movement within the limits of deviation would lead to changes in construction noise and vibration levels (increasing if movement is towards NSRs, and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (NPS EN-1, Noise Policy Statement for England, the National Planning Policy Framework and Planning Practice Guidance for Noise). How can the ExA be certain the appropriate level of mitigation will be used where movement within the limits of deviation occurs?	Specific noise and vibration monitoring locations will be identified by the Main Works Contractor(s) following their detailed construction noise and vibration assessments, and these will be shared with the relevant local planning authority, secured by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E]**. Monitoring proposals will be detailed in the Noise and Vibration Management Plan prior to commencement of construction, secured by commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E]**. Noise and/or vibration monitoring is also secured via commitment NV03 of **7.2 Outline Code of Construction Practice [Revision E]** as part of Section 61 applications for works which may exceed the relevant BS 5228 'ABC' or vibration thresholds, through consultation with the relevant Local Planning Authority. Commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E]** has been updated at Deadline 5 to include provision of details of proposed noise and vibration monitoring to the relevant Local Planning Authority, together with provision of the detailed assessments. NV03 has also been updated to clarify when, through consultation with the relevant Local Planning Authority, Section 61 applications will be undertaken. This relates to greater clarity on the definition of construction noise and vibration exceedance thresholds and 'significant adverse effects' in commitment NV01 of **7.2 Outline Code of Construction Practice [Revision E]** being included at Deadline 5. The assessment and management process, following the updates made at Deadline 5, are as follows:

Reference	Question to	Question	Applicant's Response
			1. The Main Works Contractor(s) will prepare detailed construction noise and vibration assessments based on their proposed methods, working locations, and works program, and determine site specific mitigation measures showing how 'significant adverse effects' will be avoided, and detail any proposed monitoring (Commitments NV05, NV01, and NV04). 2. The assessment will be shared with the relevant Local Planning Authority. (Commitment NV05) 3. Where potential construction noise and vibration threshold exceedances are identified by the Main Works Contractor's assessment, they will liaise with the Local Planning Authority to discuss and agree their requirements for Section 61 applications. (Commitment NV03) 4. Where requested by the Local Planning Authority, the Main Works Contractor(s) will prepare a Section 61 application, detailing the assessment, the mitigation measures and temporal restrictions to avoid 'significant adverse effects', and any monitoring proposals. (Commitment NV03 and NV01) 5. The Main Works Contractor(s) will update the Noise and Vibration Management Plan (NVMP) with the proposed mitigation and monitoring proposals. (Commitment NV05) The updated commitments therefore clarify how the Applicant can ensure and commit to 'significant adverse effects' being avoided, with appropriate oversight and consultation with the Local Planning Authority, irrespective of works locations within the Limits of Deviation.
NV 2.2	The Applicant	Noise & Vibration 2 Explain how you have reached your conclusions, as set out in ES Chapter 14 (Noise and Vibration) regarding construction noise and impacts on NSRs, bearing in mind	As outlined in response to question NV 2.1, the updates to commitments NV01, NV03, and NV05 in **7.2 Outline Code of Construction Practice [Revision E]** clarify the commitment to 'avoid significant adverse' effects due to construction noise and vibration, and the process by which this will be achieved, irrespective of the location of the works within the Limits of Deviation (LoD).

Reference	Question to	Question	Applicant's Response
		the degrees of variation that would be permitted by the Limits of Deviation as currently sought in the draft DCO? For example NSRs on Old Mill Lane could in theory be 50 metres away from a pylon placed on the edge of the Order limits. How has the ES has considered the worst case scenario for construction noise impacts on these NSR and how can the ExA be certain the level of effect will not be higher than those set out in the ES.	Taking the example given in the question of Old Mill Lane, whilst the LoD is approximately 50 m away from these receptors, the pylons could not feasibly be built at the nearest point of the LoD to these receptors, as the pylon is constrained by the corner location to ensure the overhead line does not over-sail outside of the LoD (noting that the LoD is for the overhead line, and not just the pylons). Nevertheless, a worst-case assessment of the outer extent of the LoD has been considered. The nearest proposed pylon based on the preferred alignment is located approximately 110 m from this location with a predicted worst-case noise level of 63 dB $L_{Aeq,T}$ for overhead line works and 66 dB $L_{Aeq,T}$ cumulatively for all works, without mitigation. As this level exceeds the 65 dB L_{Aeq10h} threshold for weekday BS 5228 'ABC' noise threshold it was identified as a 'hotspot' in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** and **6.14.F2 Environmental Statement Figure 14.2 - Construction Noise Assessment Outputs [APP-263]** (page 15). Assuming a pylon is constructed at the extent of the LoD, closest to the properties, the resultant worst-case construction noise level would be approximately 69 dB $L_{Aeq,T}$, without mitigation. With mitigation, noise levels would be expected to be lower and can readily be below the 65 dB L_{Aeq10h} 'ABC' threshold during weekday daytime periods, as defined by Annex E.3.2 of BS 5228-1[25]. However, it is considered unlikely that mitigation measures would be able to reduce noise levels to below the 'weekend' BS 5228 'ABC' threshold. Assuming this is the case, under the proposed commitments NV05 and NV03 in **7.2 Outline Code of Construction Practice [Revision E]**, the Main Works Contractor(s) will liaise with the Local Planning Authority to discuss and agree the requirements for a Section 61 application, and this will include detailing the specific mitigation and temporal restrictions

[25] British Standards Institution (2014). *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*.

Reference	Question to	Question	Applicant's Response
			during weekend periods to ensure that 'significant adverse effects' are avoided. This will also include any monitoring requirements. The same process will apply should the detailed assessment identify potential exceedance of the relevant BS 5228 'ABC' threshold during weekday daytime, or night-time periods. Through this process, suitable mitigation measures, including temporal restrictions, are secured such that 'significant adverse effects' are avoided.

13. Public Rights of Way

Table 13.1 Public Rights of Way

Reference	Question to	Question	Applicant's Response
PRoW 2.1	The Applicant	PRoW 1 The ExA notes your response to **ExQ1 [REP3-074]**, question PRoW 1.3. It also notes the outline PRoWMP (document 7.6) **[REP4-178]** and the responses set out in your 'Comments on any Further Information or Submissions Received by Deadline 2' **[REP3-070]**, as relevant to PRoW, especially where you state: "…no PRoWs are proposed to be temporarily closed without a diversion due to there being no suitable or safe available route. A number of short PRoW sections will become temporarily redundant due to the works but these will subject to the provision of connecting diversion routes, so the PRoW network as a whole will remain connected, with continuous access maintained either along the existing alignment under managed access (identified as Temporary Closure (Managed)) or via a temporary diversion (identified as Temporary Closure With Diversion)."	The Applicant notes the Examining Authority's query regarding the apparent discrepancy between the overarching PRoW strategy and the provisions of Article 16 and Schedule 8 (Part 4) of **3.1 Draft Development Consent Order [Revision E]**. The PRoWs listed in Schedule 8, Part 4 of **3.1 Draft Development Consent Order [Revision E]** include any that would be subject to temporary closure with no diversion and those that would be subject to temporary closure under a managed access regime (Temporary Closure (Managed)). As set out in **7.6 Outline Public Rights of Way Management Plan [Revision C]**, the routes subject to a Temporary Closure (Managed) regime would, in practice, remain available to users along their existing alignment, with access facilitated through appropriate management measures. The Applicant's position therefore remains that these PRoW, and the overall PRoW network, would continue to remain connected, with access maintained either through managed access on the existing alignment, or via localised, temporary 'Chapter 8' routeing around working areas where appropriate. The inclusion of these Temporary Closure (Managed) PRoWs in Part 4 reflects the fact that, at specific times during construction activities, there may be temporary and short-duration restrictions on PRoW use for safety reasons, for example where users may need to be held briefly while construction activities are paused to allow

Reference	Question to	Question	Applicant's Response
		However, the draft DCO at Article 16 (Temporary closure of streets and public rights of way) and schedule 8 (Streets or PRoW to be temporary closed) at Part 4 (PRoW to be temporarily closed for which no diversion is to be provided) would appear to contradict this position and allow the PRoW listed in Part 4 to be temporarily closed for which no diversion is to be provided. The applicant is requested to explain this discrepancy.	safe passage, where the contractor will manage crossings, or when directing users safely around a localised working area. The approach to listing PRoWs subject to managed access within Schedule 8, Part 4 is intended to ensure that all necessary powers are secured within **3.1 Draft Development Consent Order [Revision E]** to enable safe construction. This includes acknowledging the potential for temporary restrictions on use, even where PRoWs are expected to remain accessible in practice. This approach is consistent with that adopted on other Nationally Significant Infrastructure Projects to ensure appropriate powers were in place, including in the National Grid (Bramford to Twinstead Reinforcement) Order 2024, where PRoWs subject to managed access were similarly included within Schedule 7, Part 2 (Streets Or Public Rights Of Way To Be Temporarily Closed For Which No Diversion Is To Be Provided).
PRoW 2.2	The Applicant	PRoW 2 Tables 7.2 and 7.3 of the outline PRoWMP (document 7.6) [REP4-178] under the column 'Indicative Duration' (Table 7.2) and 'Indicative Duration of Regime' (Table 7.3) lists the 'Duration of Works'. However that term is not defined in the document. Does it mean the duration of the works specific to that element of the overall project, does it mean the duration of the entire works (ie the entire project), or does it mean something else. Can the applicant provide clarification?	The Applicant addressed this point on page 596 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in response to question PRoW 1.5 and confirmed that the term 'duration of works' has been used for activities associated with site access, haul roads and associated drainage. These are features that are established early in the construction programme to provide access to the working areas from Primary Access Routes and bellmouths, and are generally removed late in the programme once works are complete and commissioned. As such, their presence, and the resulting impacts on PRoWs, may extend for the duration of the main works construction activity in that section that they serve. More precise durations will be available once the Main Works Contractor(s) have developed the detailed construction programme post-consent.

14. Safety and security

Table 14.1 Safety and security

Reference	Question to	Question	Applicant's Response
SS 2.1	The applicant	Security and resilience Burstall Parish Council has made repeated submissions setting out its concerns relating to the security and resilience of Bramford substation, and the ExA notes such concerns could also be applicable to the other existing and proposed substations, as well as the pylons and overhead lines. A number of other representations have been received in respect of security concerns including relating to clustering of energy projects around substations. NPS EN-1 section 4.16 sets out that national security considerations apply across all national infrastructure sectors, and refers to consultation with relevant security experts from the National Protective Security Authority (NPSA). The applicant is asked to provide: a) Further detailed comments in response to Burstall Parish Council and others, particularly in relation to points made regarding network	The Applicant notes that a number of the matters raised in relation to security and resilience have been addressed in previous submissions and responses provided during the Examination, as well as within the application documents. Those submissions set out the Applicant's approach to network resilience, security design, operational continuity and protection of critical national infrastructure. The comments below provide further context in relation to network resilience, infrastructure clustering and engagement with relevant security bodies. The Applicant recognises that the scale and concentration of existing and proposed electricity infrastructure in the Bramford Substation area gives rise to concern for some local communities. However, the development and operation of transmission infrastructure is undertaken through established national planning, engineering, operational and regulatory frameworks intended to ensure the secure, resilient and efficient operation of the wider electricity network. The concentration of transmission infrastructure at strategic connection locations is not unique to Bramford and is not the result of unplanned or piecemeal development. Similar configurations exist elsewhere across the national electricity transmission network and will continue to form part of the coordinated development of the UK energy system as increasing volumes of generation, including offshore wind, solar and energy storage, are connected to the network in support of national energy policy objectives. Such arrangements form part of the established design and operation of

Reference	Question to	Question	Applicant's Response
		resilience and clustering of electricity infrastructure around existing and proposed substations. b) A high level summary of its consultation with the NPSA and any other relevant authorities. The ExA appreciates that assessments and proposals relating to security and resilience of existing and proposed electricity infrastructure are subject to public disclosure requirements. Therefore, if the applicant's submission includes matters which are subject to disclosure and therefore cannot be published publicly, the applicant is asked to provide this as a separate confidential document and to contact the Norwich to Tilbury case team regarding the Planning Inspectorate's handling of such information.	the national electricity transmission system and are intended to support secure and resilient network operation. In considering network design, there is a balance between resilience, operability, environmental effects, constructability, impacts on communities and overall value to consumers. While in theory it would be possible to develop a larger number of smaller substations and associated infrastructure across wider geographic areas, this would itself introduce substantial additional infrastructure, land requirements, maintenance and operational complexity, together with increased impacts on communities and the environment. The transmission network is therefore developed in accordance with established engineering and security standards intended to achieve an appropriate and proportionate balance across all these considerations. Whilst compliance with the Security and Quality of Supply Standard (SQSS) forms an important component of network resilience, the Applicant does not rely solely on compliance with the SQSS when considering resilience and operational continuity. Security and resilience considerations form part of a wider framework of design, operational and regulatory processes applied to critical national infrastructure, including consideration of credible outage and disruption scenarios. Security considerations have been taken into account throughout the development of the Project, including through the application of established security design principles, consideration of physical and operational resilience, and engagement with relevant security stakeholders where appropriate. The Applicant also notes that a number of generation and storage developments referenced in representations, including offshore wind, solar and battery storage projects, are promoted and operated by independent third parties. Such developments are subject to their own regulatory, operational, resilience and security obligations in accordance with the relevant legislative and industry standards.

Reference	Question to	Question	Applicant's Response
			In relation to engagement with relevant security authorities, the Applicant confirms that security considerations for the Project have been undertaken in accordance with established government guidance and through engagement processes with relevant security and advisory bodies, including the National Protective Security Authority and associated stakeholders where appropriate. The Applicant considers that the approach adopted is consistent with the security and resilience framework set out in paragraph 4.16.6 of NPS EN-1 (2024) for nationally significant energy infrastructure, including consideration of security matters during Project development and engagement with relevant security stakeholders. Due to the sensitive nature of security related matters, detailed assessments, operational arrangements and specific mitigation measures are not appropriate for publication within the public domain. The Applicant will continue to assist the Planning Inspectorate in answering any request it is able to make in accordance with the rules on handling such confidential information.
SS 2.2	East of England Ambulance Service	East of England Ambulance Service: request for response The ExA acknowledges the signed SoCG between the applicant and the East of England Ambulance Service [REP4-252]. However you have not responded to ExQ1 SS 1.5 regarding justification for your request for a funding as set out in your original submission [AS-063], which the applicant responded to at paragraph 1.1.5 of [REP1-135]. You are also asked to review the applicant's response to ExQ1 SS 1.3 (page 607 [REP3-074]) and provide any comments, as necessary.	The Applicant welcomes engagement with the East of England Ambulance Service NHS Trust, and will continue to engage where required as the Project progresses.

Reference	Question to	Question	Applicant's Response
SS 2.3	The applicant	Aviation safety – Consultation and engagement It is clear that there is a substantial difference in opinion between the applicant, the General Aviation Awareness Council and various airfields over the impact of the proposed development on aviation safety, with many representations noting the history of the project and ongoing consultation issues. As stated in ISH2, the ExA request that engagement on outstanding issues between the applicant and relevant stakeholders is prioritised. Provide detail of how you intend to achieve such engagement during the time remaining in the examination, including detail such as dates of meetings and deadlines for actions.	The Applicant's response focuses on our engagement and consultation with civil aviation stakeholders, and predominantly General Aviation aerodrome operators. Paragraphs 15.3.13 to 15.3.17 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]** provide a high-level description of our engagement with these operators, recognising their safeguarding responsibilities and the importance of ensuring understanding of aerodrome operational activities, as well as safeguarding concerns, to inform the Applicant's impact assessment and the development of the Project's design. This is in accordance with paragraphs 5.5.39 and 5.5.43 to 5.5.44 of National Policy Statement (NPS) EN-1 (2024). The Applicant is fully cognisant of differences in opinion with the General Aviation Awareness Council and a minority of aerodrome operators in relation to consultation matters. These are addressed within Statements of Common Ground (where applicable) as well as previous Applicant responses, but the key matters under discussion are described below, with the Applicant's position re-stated. It should be noted that the clear majority of aerodrome operators and their experts have accepted the approach adopted by the Applicant and have reached positions which are agreed in large part. • Consideration of major disasters within Environmental Impact Assessment (EIA) Scoping **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 264) responds to the **Raydon Wings Aerodrome Written Representation [REP1-268]** assertion that the possibility of a major disaster involving aviation was not considered in the EIA scoping. The Applicant's response disproves this assertion by referencing paragraph 5.7.3 (seventh bullet) of **6.19 Scoping Report [APP-296]** which shows the Applicant's early recognition of risks associated with third-party transport disturbing or damaging Project infrastructure, potentially leading to serious

Reference	Question to	Question	Applicant's Response
			harm. Within the same paragraph, the Applicant states that it will liaise with aerodromes in the vicinity of the overhead line (amongst other aviation stakeholders) to inform understanding of potential impacts and reduce adverse effects. This undertaking is consistent with the engagement approach taken, as described within **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]**, and in accordance with the Planning Inspectorate's **6.20 Scoping Opinion [APP-297]** which advised that any likely significant effects on users of airfields should be assessed within the Environmental Statement (see ID 3.13.13). Despite the previous Applicant response, the detail of which is also duplicated within its position in relation to Matter 7.2 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]**, the aerodrome operator has repeated their incorrect assertion as to the failures of the EIA within **Raydon Wings Aerodrome ISH2 Written Post-Hearing Submissions [REP4-370]**. This unfounded position has also been stated within **General Aviation Awareness Council Written Representation [REP2-050]**. • Consideration of aviation within early route development **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 264) responds to the **Raydon Wings Aerodrome Written Representation [REP1-268]** position that the Applicant took no account of General Aviation aerodromes proximate to the proposed route in its development of the preferred corridor graduated swathe. Our response signposts **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]**, undertaken to identify broad locations for the required infrastructure, within which Table 3.3 identifies aviation and defence as one sub-topic for consideration across the wider receptors within the Options Appraisal. The response explains that related sites did not form a constraint to be avoided by a defined separation, which the Applicant considers to be a reasonable and responsible approach

Reference	Question to	Question	Applicant's Response
			at this early stage of the route's development in view of the variable and site-specific factors that could determine Project impacts on aviation. It is also consistent with guidance in NPS EN-1 (2024) which does not suggest that infrastructure must always avoid aerodromes as part of strategic routeing. Rather it explains that aerodromes needs must be balanced with the urgent need for new energy developments which bring about a wide range of social economic and environmental benefits (see paragraph 5.5.5). The position is reiterated within Matter 7.2 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]**. Despite explanation and discussion, **Raydon Wings Aerodrome ISH2 Written Post-Hearing Submissions [REP4-370]** repeats the incorrect operator position that General Aviation aerodromes were not appropriately considered at an early stage. **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** (page 154) responds to the **General Aviation Awareness Council Written Representation [REP2-050]** which states General Aviation was not considered when the proposed route was first published, and the proposed route was identified before any attention was given to the existence or proximity of airfields. The response signposts the **8.8.1 Applicant's Comments on Written Representations [REP2-029]** response and further states that General Aviation was not considered differently to broader civil aviation impacts. The response reiterates that the Applicant's approach on this Project responds to the need to consider variable and site-specific factors to determine aviation impacts of the Project, informed by operator consultation, rather than applying a generic, potentially unsuitable and disproportionate separation distance to avoid identified aerodromes when developing the preferred corridor graduated swathe (considering generic parameters described within the Civil

Reference	Question to	Question	Applicant's Response
			Aviation Authority's CAP 793[26] guidance). Despite this explanation, the **General Aviation Awareness Council ISH2 Written Post-Hearing Submissions [REP4-361]** misrepresents the Applicant's position by stating the presence of aerodromes was not a consideration in route planning, and the presence and nature of aerodromes was not taken into account for the first two years of the Project being in the public domain. In fact, the preferred route corridor graduated swathe was first published and subject to non-statutory consultation in 2022. The 2023 Preferred Draft Alignment was subsequently developed, responding to feedback from aviation stakeholders (including from the GAAC – see Section 5 - **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249]**) and subject to non-statutory consultation again in 2023 (see also bullet point relating to 'meaningful consultation' below). Furthermore, the **General Aviation Awareness Council ISH2 Written Post-Hearing Submissions [REP4-361]** states there should have been a tailored appraisal taking account of the nature of the flying activity, topography and context. This position is entirely consistent with the Applicant's design development approach, aligned with the principles of the advice of the Civil Aviation Authority Airfields Advisory Team (CAA AAT) (see paragraph 15.3.15 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]** and paragraph 3.17.4 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**) but contradictory to the GAAC's previously articulated position that CAP 793 guidance for the design of runways (paragraph 3.6) should be applied as a requirement for no new obstacle of 150 ft to be within 2,000 m of a runway mid-point (see **General Aviation Awareness Council Written Representation [REP2-050]**).

[26] Civil Aviation Authority (2010) *CAP 793 Safe Operating Practices at Unlicensed Aerodromes*

Reference	Question to	Question	Applicant's Response
			Relevant legislation, regulation or national policy does not mandate or require a minimum separation distance from aerodromes and so these sites were not avoided by the initial corridor and graduated swathe development. In this respect, aerodromes were treated in a similar way to other interests or operations (such as listed buildings or third party developments). The Applicant's approach enabled ongoing, more nuanced consideration (informed by consultation and engagement with relevant parties) of how the emerging design interacts with aviation interests and how this interaction might most appropriately be responded to, reflecting potential and variable mitigation options delivered through design changes (such as route adjustments) or adjustments to operational procedures. The approach is also flexible, enabling the appropriate consideration of proposed or newly developed aerodromes, recognising general aviation airstrips in particular can be readily established with minimal consenting or licensing requirements. It is also consistent with the International Civil Aviation Organisation (ICAO) modernisation of the Obstacle Limitation Surface framework to support the management and acceptance of categories of obstacle-related risk, rather than avoidance, to reflect the realities of increased development near to aerodromes (see Action 5 (first and third bullet) of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**). • Meaningful consultation resulting in design changes Various representations from the operators of Raydon Wings, Tibenham and Priory Farm aerodromes have suggested the Applicant's consultation has not been meaningful, alleging feedback (from the operators themselves and other aviation-relevant stakeholders) has not been taken into account, and objecting to concerns raised not resulting in changes to the Project design. **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]**, **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]** and **8.3.37 Draft**

Reference	Question to	Question	Applicant's Response
			Statement of Common Ground – Tibenham Aerodrome [REP4-249] provide detailed chronologies of the Applicant's comprehensive engagement with these operators from the 2022 non-statutory consultation on the preferred route corridor graduated swathe to date. Furthermore, the SoCGs state the Applicant position that consultation undertaken was fully compliant with the Statement of Community Consultation as described within **5.1 Consultation Report – Appendix E - Statement of Community Consultation (SoCC) and supporting evidence [APP-071]** and legislative requirements under the Planning Act. The Applicant has been able to agree acceptable solutions with the majority of aerodromes in the vicinity of the proposed overhead line, who have all been consulted in a similar and proportionate manner as those still subject to negotiation. The ExA is referred to these negotiations and agreements summarised in Table A15.2.4 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]** and detailed within **5.9.22 Signed Statement of Common Ground – Barnards Farm Airfield [REP1-050]**, **5.9.23 Draft Statement of Common Ground – Thurrock Airfield [REP4-097]**, **5.9.32 Signed Statement of Common Ground – Brook Farm Aerodrome [REP1-060]**, **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101]** and **8.3.34 Signed Statement of Common Ground – South Norfolk Model Flying Club [REP4-244]**. The scope of disagreement with three named aerodromes should be seen in this context. The SoCGs reference the Design Development Report (DDR), which evidences consideration of stakeholder feedback throughout the development of the Project design. This evidence is summarised for each of the three named aerodromes as follows: Raydon Wings Pages 13 to 14 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** signpost paragraphs 5.4.104

Reference	Question to	Question	Applicant's Response
			to 5.4.110 of **7.21 2024 - Design Development Report for the Project [APP-359]** which explain how Operator feedback to the 2023 non-statutory consultation led to a significant change to the 2023 draft alignment to minimise aviation impacts (in accordance with paragraph 5.5.50 of NPS EN-1 (2024). It is therefore inaccurate for the Operator to suggest the Applicant refused to consider any changes to the position of the overhead line (see paragraph 3.8 of **Raydon Wings Aerodrome ISH2 Written Post-Hearing Submissions [REP4-370]**) when changes have been implemented. The Applicant response also references paragraph 6.1.6 and Figure 6.2 of **5.15 Design Development Report [APP-122]** which describe how subsequent Operator feedback to the 2024 statutory consultation on the resulting 2024 draft alignment ensured consideration of alternative overhead line routeing and Cable Sealing End (CSE) compound siting proposals, with the conclusion that the alternatives were not justified on grounds of aviation impacts and less preferred, transferring effects to other receptors. As such no further changes were implemented. Proposed changes to the underground cable alignment in the vicinity of Raydon Wings were subject to targeted consultation in 2025. The overhead line alignment was not subject to targeted consultation as it did not change from the 2024 draft alignment. The detail of the design development decision-making is further described as follows: The siting of the CSE compound has evolved throughout the development of the Project informed by the Horlock Rules (and Holford Rules for the connecting overhead line) as promoted by NPS EN-5 (2024). The initial consideration was of sites closer to the original corridor and graduated swathe as set out at paragraph 5.5.78 of **7.20 2023 - Design Development Report for the Project [APP-358]**. This earlier study concluded with a site to the south of

Reference	Question to	Question	Applicant's Response
			Notley Enterprise Park being preferred with an alignment offset to the south of the Raydon airfield alignment. Subsequent rounds of consultation and consideration of feedback has prompted further change. Initially (as reported in **7.21 2024 - Design Development Report for the Project [APP-359]**) with the CSE moved to the position to the north of Wenham Grove with the associated movement of the overhead alignment offset to the north of the airfield alignment and the underground cable routed to the south west end of the airfield. Finally, the cable route was modified to cross the northeastern end of the airfield runway. Other alternatives have been considered for the positioning of the CSE compound. All alternatives would lead to greater length of underground cable and at a cost far in excess of the overhead line alternative. The existing site is consistent with policy in respect of the National Landscape and does not require a change. All alternatives to the north of the disused rail line, for example to the north of Brimlin Wood, lead to an increase in effects for homes and listed buildings such as at Vauxhall and Brimlin Cottage and Elm Cottage and lead to additional effects from overhead line routeing through more restricted gaps between homes. Locations immediately to the north of the disused rail line limit the additional length of cable but do still increase effects on homes and listed buildings such as Wenham Grange and Vauxhall. Further detail is set out in paragraph 6.1.6 and Figure 6.2 of **5.15 Design Development Report [APP-122]**. The Applicant's position is also that such a localised switch (approximately 100 m) from one side to the other of the disused rail line would have no material effect on reducing the perceived risks to potential future aerodromes uses (see also continued engagement comments below). The Applicant is clear that the proposed location, between Wenham Grove and the disused rail line, provides a location in conjunction with the overhead line that benefits from substantial existing screening between the CSE compound and

Reference	Question to	Question	Applicant's Response
			existing homes and listed buildings and could see that screening readily strengthened. Priory Farm The Applicant response to SS 1.11 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** references **7.20 2023 - Design Development Report for the Project [APP-358]** (see paragraph 5.5.21, and paragraphs 6.4.13 to 6.4.17), **7.21 2024 - Design Development Report for the Project [APP-359]** (see paragraphs 5.4.25 to 5.4.26 and 5.4.29) and **5.15 Design Development Report [APP-122]** (see paragraph 4.5.1) which provide evidence of the consideration of consultation feedback (including Priory Farm operator concerns) throughout the Project's development. The response also explains that changes to the Project design have not been implemented as they are not considered to be appropriately justified by the minimal assessed adverse impacts on the operation and safety of the aerodrome. This Applicant position is also represented within Matter 7.4 of **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]**. Tibenham The Applicant response to SS 1.8 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** cross-references the response to SS 1.11, with the same DDR references also providing evidence of consideration of consultation feedback relating to Tibenham aerodrome (including Tibenham operator concerns) during the development of the Project's design. As with Priory Farm, the Applicant position is that it is unable to pursue alternative routeing options on the basis of potential adverse impacts to the aerodrome presented without sufficient evidence. This position is further represented within Matter 7.5 of **8.3.37 Draft**

Reference	Question to	Question	Applicant's Response
			Statement of Common Ground – Tibenham Aerodrome [REP4-249]. **Norfolk Gliding Club ISH2 Written Post-Hearing Submissions [REP4-366]** implies Chase Farm, along with Raydon Wings, Priory Farm and Tibenham aerodromes, has had the same experience with regards to the Applicant's consultation and engagement approach. This is not the case. Section 4 of **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101]** describes how early assessment of the preferred corridor graduated swathe recognised impacts on the continued operation of the aerodrome, with detailed assessment of the 2023 preferred draft alignment and assessment of alternatives confirming this conclusion. Design changes implemented within the 2024 preferred draft alignment in response to these assessments and stakeholder engagement reduced adverse impacts, but it was agreed with the operator that the Project (in its proposed alignment) would result in the aerodrome ceasing to operate. Subsequent collaboration between the Applicant and the operator has explored options for the reorientation or relocation of the runway to allow continued operations. The SoCG references paragraphs 2.6.6 and 10.3.1 to 10.3.5 of **5.15 Design Development Report [APP-122]** as summarising the consideration of Chase Farm's runway design options as well as alternative overhead line alignments and pylon types during the development of the proposed Project alignment. Chase Farm provides a clear example of the Applicant's early engagement and successful collaboration with an aerodrome operator to understand potential impacts on aviation operations and develop mitigations as appropriate (in accordance with paragraph 5.5.44 of NPS EN-1 (2024)) as well as the operator's ongoing review of the possibility of agreeing to make reasonable changes to aerodrome operations (paragraph 5.5.50 of NPS EN-1 (2024)). This is in direct accordance with paragraph 5.5.5 of NPS EN-1 (2024)

Reference	Question to	Question	Applicant's Response
			which places a reciprocal requirement on aerodrome operators and energy infrastructure developers to work collaboratively. Further evidence of collaborative engagement is provided in the cases of General Aviation aerodromes Brook Farm and Thurrock. **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** (page 162) responds to the **General Aviation Awareness Council Written Representation [REP2-050]**, which incorrectly states the Applicant has not included any mitigation measures as an integral part of the Project (to accord with NPS EN-1 (2024), paragraph 5.5.43), as well as stating no evidence has been presented to demonstrate the provisions of paragraph 5.5.50 of NPS EN-1 (2024) had been followed, which requires the Project to be designed, where possible, to minimise adverse effects on aerodromes. The response references paragraphs 5.4.43 to 5.4.44 of **7.21 2024 - Design Development Report for the Project [APP-359]**, and paragraphs 5.1.1 to 5.1.3 of **5.15 Design Development Report [APP-122]** which provide evidence of the Applicant's consideration of operator feedback and the implementation of design changes to realign the overhead line and minimise impacts on Brook Farm aerodrome. The response also references paragraphs 11.1.1 to 11.1.8 of **5.15 Design Development Report [APP-122]**, which provides evidence of extensive collaboration with the operator of Thurrock, resulting in the implementation of design-based mitigations, including realignment of the proposed overhead line and reductions to pylon heights to address aviation impacts, including cumulative effects due to an existing overhead line. **5.9.32 Signed Statement of Common Ground – Brook Farm Aerodrome [REP1-060]** confirms the operator's agreement of the acceptability of the proposed alignment, following test flying undertaken by the operator to validate the Applicant's impact assessment approach and conclusions. Matter 6.1 of **5.9.23 Draft Statement of Common Ground – Thurrock Airfield [REP4-097]** confirms the operator's

Reference	Question to	Question	Applicant's Response
			concurrence with the Applicant position that, following strong objection to the Project on the grounds of adverse aviation safety impacts, and the subsequent implementation of design changes, the proposed alignment will not be detrimental to the safe operability of the aerodrome. In contrast to Chase Farm, Brook Farm and Thurrock aerodromes, and as previously stated within paragraphs 3.17.5 to 3.17.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, the consideration of stakeholder feedback and Applicant impact assessments concluded changes to the Project design in relation to Priory Farm and Tibenham (or further changes in the case of Raydon Wings) were not sufficiently justified. The aerodrome operators have not agreed the acceptability of the proposed alignment but have also not collaborated with the Applicant through sharing of detailed operational information to verify or counter impact assessment conclusions, nor considered the possibility of making reasonable changes to operational procedures, where these have been identified. We continue to engage with the aerodrome operators to resolve outstanding matters. Further details are provided as follows: • Raydon Wings As per **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** (page 15) our engagement is focused on establishing if there is any sufficient information to justify re-opening the Cable Sealing End compound siting decision and implementing further design changes. Our response within **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]** refers to our repeated requests for information, including to obtain clarity on the operator's commitments in terms of future operational proposals to determine whether these have been appropriately considered (see also Matters 7.5 and 7.6 within **8.3.35 Draft Statement of**

Reference	Question to	Question	Applicant's Response
			Common Ground – Raydon Wings Aerodrome [REP4-245]). The Applicant understands that these proposed uses which by and large are not current are wide-ranging (including gliding, parachuting, the establishment of a flight school, and potentially licensing of the runway) and is conscious they will necessarily attract different (lesser) weighting to extant uses within any further impact assessment and design development-related decision making, subject to the maturity and tangible progression of proposals. Furthermore, the operator has not provided information to explain the proposals, how they would be impacted, or indeed mitigated such as via relocation of the CSE compound by 100 m. A meeting on 15 June has been agreed to discuss this further. We have requested the meeting also addresses whether impacts on extant or proposed uses can be mitigated by reasonable changes to operational procedures (such as the undertaking of aerobatics away from the aerodrome and/or the Project) as identified by paragraph 5.5.50 of NPS EN-1 (2024). Further to previous joint agreement that discussion of the appropriate mitigation of construction impacts can be progressed, we have also proposed this matter within the meeting agenda (see also Matter 7.7 within **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]**). • Priory Farm Further to SS1.11 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (pages 624 and 626) which recognised Applicant proposals to focus continued engagement on the operational matters of circuit flying and forced landing risks, as well as the potential incorporation of marker balls to mitigate operator visibility concerns, **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]** (Sections 3 and 5) updated that the discussion of these matters was not agreed by the operator. More recently and further to Action 5 (third bullet) within **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** which reiterated the Applicant's suggested

Reference	Question to	Question	Applicant's Response
			potential use of marker balls, as well as noting the absence of the operator's requirement for low height pylons, the operator has now agreed to meet to discuss appropriate mitigation options. A meeting on 12 June has been agreed, and will include discussion of potential benefits of and justification for a range of potential mitigation measures in order to reach agreement within the remainder of the examination period. • Tibenham Further to Action 5 (first bullet) within **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** which references **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249]** and describes attempted engagement with the operator to enhance consideration of site-specific impacts and explore appropriate mitigation measures, including in relation to competition flying (and in conjunction with the British Gliding Association (BGA)), the operator has continued to reject the Applicant's meeting proposals on the grounds of a perceived withholding of information by the Applicant. By contrast, **8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision B]** has been updated and submitted to provide details of the BGA and Applicant engagement and consideration of gliding-specific operational parameters (see Appendix A), directly relevant to Tibenham. The Applicant has proposed further meetings with the BGA, most recently for the week beginning 15 June 2026, to confirm our respective positions. The Applicant has invited the operator to attend also, recognising dependencies on their engagement to develop impact assessments and mitigation proposals. We have also proposed a separate, bilateral meeting between the Applicant and Norfolk Gliding Club in the same period, if preferred by the operator. In the interim, the Applicant position is that, based on its review of the operational parameter information shared and discussed to date, its impact assessment conclusions for the aerodrome remain accurate and

Reference	Question to	Question	Applicant's Response
			substantive design changes are not justified (see Matters 7.2 and 7.3 of **8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision B]**). • Other Aerodromes With regards to Chase Farm, updates to and the resolution of outstanding matters within **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101]** is pending the landowner/operator's receipt of a quote for proposed works prior to confirming their preferred mitigation option and the Applicant's securing of related commitments. For Thurrock airfield, the Applicant is confirming formal commitments to reassure the operator in relation to limitations to changes to the Limits of Deviation while the aerodrome remains operational (Matter 7.1 within **5.9.23 Draft Statement of Common Ground – Thurrock Airfield [REP4-097]** refers). It is anticipated that a signed version of the SoCG will be submitted at Deadline 6.
SS 2.4	The applicant General Aviation Awareness Council Norfolk Gliding Club/Tibenham Airfield Raydon Wings Aerodrome Priory Farm And any other relevant IP	Aviation safety resolution – Agent of change It was stated in ISH2 and is reiterated in the written summary of oral submissions [REP4-302] that the matter of public safety is one for the aerodrome operator and that insofar as operations are alleged by an operator to be unsafe then they will not happen and the operator will cease that element of the operation. However, there is clearly a difference in opinion between the applicant and many of the relevant airfield operators between whether the proposed development will	The Applicant has previously responded to representations relating to the 'agent of change' principle within the National Planning Policy Framework (NPPF, 2025, paragraph 200) from operators (see Matter 7.1 within **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]**, Matter 7.1 within **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249]** and page 273 of **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]**), the General Aviation Awareness Council (page 167 of **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]**) and Sport England (page 727 of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**). The Applicant's position is summarised with regards to its approach being consistent with the requirements of NPS EN-1 (2024) and

Reference	Question to	Question	Applicant's Response
		cause issues of public safety. The ExA understands the position of the applicant in this matter (in short that no harm will be caused, save to Chase Farm) but would appreciate the views of all relevant parties on the relevance of the 'agent of change' principle within the National Planning Policy Framework (paragraph 200).	NPS EN-5 (2024) as the primary determining policies for the application, whilst also having taken account of the NPPF and related Planning Practice Guidance, where relevant (see Matter 7.1 within **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]**, and Matter 7.1 within **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249]**). **5.6 Planning Statement [APP-085]** (paragraphs 2.5.7 to 2.5.9) also asserts this position. NPS EN-1 (2024) makes it clear that in its framing Parliament had regard to the contents of the NPPF (see paragraph 4.1.11). This will include those parts of the NPPF dealing with agent of change. The approach to aviation would also have had regard to these principles, and the bespoke approach to aviation businesses set out in NPS EN-1 provides a holistic approach to how the restrictions which might be imposed on aerodromes are to be seen in the context of nationally significant energy projects. NPS EN-1 makes it clear that there is a need to balance the national need for infrastructure against the needs of an aerodrome (paragraph 5.5.5) and that this might result in the need for operational changes (paragraphs 5.5.7, 5.5.44 and 5.5.50). Further, even the potential loss of a licensed aerodrome as a result of the need for the Project is acceptable unless national security or physical safety (arising from for example loss of air control) risks are presented (see paragraphs 5.5.59 and 5.5.60 and the Applicant response to SS 2.5 for further explanation). NPS EN-1 (2024) specifically embodies and delimits the relationship between the constraints imposed on aerodrome businesses in the context of energy Nationally Significant Infrastructure Projects (NSIPs). It cannot be countermanded by paragraph 200 of the NPPF. It is consistent with and has had regard to that paragraph but in the context of nationally needed infrastructure.

Reference	Question to	Question	Applicant's Response
			The Applicant recognises paragraph 200 of the NPPF (2025), in the context of statutory nuisance (e.g. noise) predominantly relating to music venues and sporting events, states '*existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established*' and also '*the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed*'. The Applicant notes the 'agent of change' principle does not feature in NPS EN-1 (2024) or NPS EN-5 (2024). Relevance to the Project must, therefore, be considered within the hierarchy of policy for NSIPs, where the weight given to the NPPF is determined by its conformity with the relevant NPS. Paragraph 200 of the NPPF therefore needs to be considered collectively as a whole where the NPS will attract the most weight. NPS EN-1 (2024) forms the primary policy relevant to the Project and the overall public interest balance due to the Project's critical national priority (CNP) status. Paragraph 200 is most relevant to projects which are not of national significance or CNP. Thus, NPS EN-1 (2024) policy requirements on the Applicant regarding aviation impact mitigation include providing appropriate mitigation measures as an integral part of the proposed development (paragraph 5.5.43), engaging operators and developing mitigations if appropriate (paragraph 5.5.44) and designing, where possible, to minimise adverse impacts on the operation and safety of aerodromes (paragraph 5.5.50). It is not required, nor is it realistic due to its nature, for the Project as a CNP to have no impact on existing businesses. Additionally, paragraph 5.5.5 of NPS EN-1 (2024) emphasises the need for collaboration and coexistence between aviation and energy stakeholders to ensure that aviation-related safety, operations and capabilities are not adversely impacted by new energy infrastructure, with the reciprocal need for aerodrome operators to work collaboratively with energy infrastructure developers essential for net zero. As part of

Reference	Question to	Question	Applicant's Response
			the reciprocal collaboration, paragraph 5.5.50 states '*it is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures*', demonstrating that responsibility for appropriate mitigation is not solely with the Applicant.
SS 2.5	The applicant	Aviation and Critical National Priority (CNP) Point 5.1b of the written summary of oral submissions [REP4-302] appears to state that the applicant's view is that unlicensed aerodromes do not fall within the remit of the CNP policy within EN-1 and that therefore effectively potential matters of public safety arising from the effect of the proposed development upon unlicensed aerodromes are not relevant to the application of the CNP policy. Is this a fair summation of your view?	No it is not a fair summation of the Applicant's case, so the Applicant is grateful for the opportunity to make the position clearer. Paragraph 4.2.15 of NPS EN-1 (2024) sets out a presumption that in all but the most exceptional circumstances it is unlikely that consent will be refused on the basis of residual impacts. That is the CNP presumption. The exception to this presumption of consent are residual impacts which present an unacceptable risk to or unacceptable interference with human health and public safety. All of the Project infrastructure relevant to this question is CNP infrastructure. Aviation risks are dealt with in Section 5.5 of NPS EN-1 (2024). Aerodromes which are unsafe cannot operate. Licensed aerodromes to the extent that they are unsafe will have their licences removed or modified by the CAA. For unlicensed aerodromes the responsibility to ensure safe operation lies with the operator to satisfy themselves that there is no unacceptable risk to public safety. If and to the extent that the operator takes the view, having regard to relevant guidance, that the aerodrome is unsafe then it should modify its operations (NPS EN-1 (2024) paragraph 5.5.50) such that it is safe or if that cannot be achieved then the unsafe aerodrome should close its unsafe operational capacity. The potential for infrastructure to require the closing of even licensed aerodromes is recognised by NPS EN-1 (2024) paragraph 5.5.59. For this reason, there cannot be an unacceptable risk to public safety as a result of the relationship between electricity infrastructure and aerodrome operation. If there is such a risk, then

Reference	Question to	Question	Applicant's Response
			it must be mitigated by operational changes and NPS EN-1 (2024) makes it clear that it is incumbent on the operator regularly to review the possibility of agreeing to make reasonable changes to operational procedures. If it cannot be mitigated then the aerodrome will be required to cease operation. In such circumstances there cannot be public safety implications and as a result the exception to the application of the CNP presumption is NOT engaged. All officially safeguarded aerodromes have official safeguarding zones. Areas of airspace around aerodromes which define ideally obstacle-free zones described as Obstacle Limitation Surfaces (OLS) and are shown on officially produced plans which show the OLS (NPS EN-1 (2024) paragraph 5.5.11). All civil aerodromes licensed by the CAA must comply with the OLS which are defined by criteria set out in relevant CAA guidance for licensed civil aerodromes. Unlicensed aerodromes are not required to define or abide by the OLS principle, but it is a recommended way of assessing the significance of obstacles at such aerodromes (paragraphs 5.5.14 and 5.5.15). CAA CAP 738[27] sets out that all licensed aerodromes (whether officially safeguarded or not) are required to ensure they have a system in place to safeguard their aerodrome against the growth of obstacles that present a hazard to operations (paragraph 5.5.12). Certified safeguarding maps for all aerodromes both licensed and unlicensed depicting the OLS are ordinarily deposited with the relevant Local Planning Authorities (paragraph 5.5.15). The responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator (paragraph 5.5.16). Where there is an interaction between proposed energy infrastructure and a civilian aerodrome (licensed or unlicensed)

[27] Civil Aviation Authority (2020) *CAP 738: Safeguarding of Aerodromes*

Reference	Question to	Question	Applicant's Response
			there should be a consideration of flight patterns and operational procedures (paragraph 5.5.40) and the need for mitigation (paragraph 5.5.44). Infringement of OLS by energy infrastructure can be mitigated by '*changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome*' (paragraph 5.5.44). When assessing the necessity, acceptability and reasonableness of operational changes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes (paragraph 5.5.51). Where infrastructure would prevent a **licensed** aerodrome from maintaining its licence and as a result the total operational loss of said aerodrome, the Secretary of State should consider whether such loss of operational capacity would have impacts on national security and defence or result in substantial local/national economic loss or emergency service needs (paragraph 5.5.59). Following this consideration (and in circumstances where the licensed aerodrome has by definition ceased all operations) then consent may be granted but only after the Secretary of State is satisfied that the impacts of the proposed infrastructure do not provide risks to national security and physical safety, e.g. by the loss of air traffic control or some other communication, navigation and surveillance (CNS) infrastructure associated with the closed licensed aerodrome (paragraphs 5.5.59 and 5.5.60). This series of tests reflects the greater importance generally of licensed aerodromes and the greater likelihood that they may house wider CNS capability. The loss of unlicensed aerodromes if it occurred would clearly be a material consideration but it is not a

Reference	Question to	Question	Applicant's Response
			matter where NPS EN-1 (2024) specifically directs the Secretary of State to have regard to the specific socio-economic impacts and the further tests in paragraph 5.5.59. The operational loss of unlicensed aerodromes which is brought about by the impact of energy infrastructure is not covered by the requirements of paragraph 5.5.59. The requirement only relates to licensed aerodromes and for a reason. In the present case, none of the aerodromes in question are officially safeguarded and none are licensed. None have or claim to have CNS infrastructure relevant to national security or which would give rise to physical safety issues in the event of their closure. For the reasons set out above, the Applicant is clear that the presence of the Project CNP infrastructure would not give rise to unacceptable safety concerns. Insofar as the operators take a different view – and it should be noted that save for Chase Farm none of the relevant operators appear to take the view that they are proposing to remove any capacity because it is too dangerous – the Applicant disagrees. But if the operator or the CAA takes the view that the Project infrastructure would create an unacceptable risk then it is under a duty to consider mitigation (paragraph 5.5.50) including operational changes. If these do not remove the unacceptable risk, then the aerodrome cannot operate. Either way there is no prospect of the public safety exception to the CNP presumption applying. Again, the loss of operational capacity would be a material consideration if closure took place, but in none of the cases would the impacts of closure come close to outweighing the benefits of the proposal or the CNP presumption set out above. The Applicant considers this summary to be consistent with its explanation within **8.5.7 Applicant's Written Summary of Oral**

Reference	Question to	Question	Applicant's Response
			Submissions to Issue Specific Hearing 2 [REP4-302] (pages 9 to 11) and **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** (pages 34 to 37).
SS 2.6	The applicant	Aviation safety and risk Point 5 (second bullet) of the applicant's response to ISH2 action points [REP4-303] states that the likelihood of any aircraft-specific emergency is unaffected by the presence of the Project, but that the applicant recognises that obstacles in the environment can increase the complexity of decision-making and can limit options in the event that a forced landing is required, which can affect the severity of the outcome (and therefore potentially contributes to a rise in risk). While the ExA agrees that the presence of pylons and overhead lines will not affect whether an engine failure (or similar emergency) occurs, the presence of the project would seemingly present a significant obstacle and severely limit options available to pilots of aircraft in the vicinity of the overhead lines. Furthermore, the consequences arising from an accident from an interaction between an aircraft and the overhead	The Applicant agrees with the Examining Authority's assertion that *'the consequences arising from an accident from an interaction between* [taken to mean a collision with] *an aircraft and the overhead lines and pylons would appear likely to be grave*'. That is of course the case with any electricity infrastructure and any aircraft at any location. The issue is whether the electricity infrastructure here gives rise to an unacceptable risk of collision in the real world. The Applicant has previously recognised this risk severity within **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 257) stating that potential incidents resulting from the Project obstacle may have severe consequences, and this position is reiterated within **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]** (page 268). Within **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (page 257), the Applicant has also recognised that the presence of the proposed Project as a new obstacle in the vicinity of aerodromes is a hazard that should be subject to evaluation, agreeing with the respondent (Norfolk Gliding Club) that determining the significance of risk presented by the Project as a hazard to aviation is of fundamental importance to establishing whether the risk can be accepted or requires mitigation. This is consistent with aviation risk management principles described within the Civil Aviation Authority's CAP 1059 guidance[28] The Applicant does not agree with the ExA's assertion that '*the presence of the project would seemingly present a significant obstacle*'. It is agreed that the pylons and conductors would

[28] Civil Aviation Authority (2013) *CAP 1059: Safety Management Systems: Guidance for small, non-complex organisations*

Reference	Question to	Question	Applicant's Response
		lines and pylons would appear likely to be grave. Respond to this view.	constitute large physical features in the context of an aerodrome. This is the case whenever large physical objects exist in the same context as aircraft. There are many aerodromes which operate safely on a daily basis with electricity infrastructure nearby. Obstacle significance is dependent on location relative to flight paths, height relative to the aerodrome, local topography and a number of other factors which are addressed by expert assessment. This approach is aligned with paragraph 4.5 of the CAA's CAP 168[29] standard, which lists a number of obstacle assessment criteria. Furthermore, paragraph 4.4 of the same document infers that obstacle significance is a site-specific variable. The Applicant does not agree that the proximity of a line would necessarily or unacceptably '*severely limit options available to pilots of aircraft in the vicinity*' in the circumstances of the aerodromes in this case apart from Chase Farm. Even then, there is a feasible alternative alignment of the runway, the principle for which the operator has confirmed is acceptable and the detailed options for the which are currently being considered between the operator and the Applicant. The Applicant's impact assessment methodology and its expert advice are specifically intended to result in design decisions that provide sufficient space for aircraft to manoeuvre in accordance with normal aviation practice, to avoid overflight of the Project if desired or to overfly it at a safe height, from which a normal range of manoeuvring options are available. the Applicant does not agree that the proximity of a line would necessarily '*severely limit options available to pilots of aircraft in the vicinity*' but has acknowledged that the proximity of the obstacle could potentially limit pilot options, again, dependent on multiple variables contributing to the likelihood that the obstacle could not be safely avoided, and consideration of appropriate mitigation such as pre-flight risk avoidance or via normal in-flight operational practice.

[29] Civil Aviation Authority (2025) *CAP 168: Licensing of Aerodromes*

Reference	Question to	Question	Applicant's Response
			As per our response to Action 5 (second bullet) within **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** increased risk derived from the Project as an obstacle is at worst incremental within the overall risk associated with a forced landing event. We wish to reiterate that, for all aerodromes potentially impacted by the Project (with the exception of Chase Farm) we do not assess that the presence of the proposed overhead line alignment severely or unusually limits pilot options in the case of a forced landing event and therefore do not assess that the risk to aviation operations is significant. The Applicant has sought expert guidance in this matter from its appointed aviation consultants, Alan Stratford and Associates (ASA). As a long-established company, specialising in General Aviation-related projects related to development and obstacle assessment, ASA can draw on considerable experience from work across the UK and beyond. The consultant leading the aviation analysis for the Applicant is a chartered mechanical engineer and has over 35 years of General Aviation experience, in the UK and overseas, holding qualifications for fixed and rotary wing aircraft, gliders and air traffic service provision, in addition to the highest level of commercial pilot licence. Flight safety and its role in the co-existence of General Aviation with all types of development is a longstanding and specific area of interest for ASA. ASA's role in the Project has been to support the Applicant's design development in balancing potential adverse aviation impacts with the urgent need for the proposed development as well as competing constraints. Regarding the nature of obstacles such as an overhead line, ASA has been required to answer the questions 'how far away can an overhead line be from an aerodrome and how high could it be, to ensure aviation impact is acceptably minimised' in accordance with NPS EN-1 (2024) requirements. These are questions requiring objective and quantitative answers and the norm would be to rely on established regulation to define minimum

Reference	Question to	Question	Applicant's Response
			safe distances, which allow a pilot to manoeuvre safely to avoid colliding with the line in any reasonable circumstance. For the type of operations impacted by this Project (i.e. those taking place from unlicensed aerodromes with typical General Aviation aircraft), there are few regulations. ASA has used those that are available, alongside its own General Aviation expertise and established best practice from the UK and elsewhere. For other, unregulated matters, a key objective of our engagement with aerodrome stakeholders (including aerodrome operators and aviation bodies) has therefore been to discuss and agree what site-specific distances are considered to be safe, and critically, why, so that consistent, quantified results can inform the operators' risk assessments as well as the design process. Matter 7.1 of **8.3.89 Draft Statement of Common Ground - British Gliding Association [Revision B]** explains the Applicant's aviation impact assessment methodology, primarily used to evaluate risks of collision, recognising the Project's proposed overhead line alignment will represent a new obstacle within the vicinity of aerodromes. It references paragraphs 15.3.22 to 15.3.42 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]** which provide the detailed methodology description, summarised as showing regard to multiple site-specific risk factors including the nature of the obstacle (being a line rather than a single isolated object) and whether there is an appropriate clearance margin to overfly or avoid the obstacle on take-off or landing, as well as within forced landing scenarios. The Applicant's position within the SoCG provides focus on the assumption parameters applied within the methodology (paragraph 15.3.28 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]**) and explains that the

Reference	Question to	Question	Applicant's Response
			Applicant considers UK SERA 3105[30], UK SERA 5005[31] and the CAA's ORS4 1496[32] in relation to minimum heights to be relevant to assessed overhead line clearances, especially where these relate to aircraft take-off and landing. The Applicant's engagement approach has been demonstrably successful at Brook Farm, Chase Farm and Thurrock aerodromes, where the Applicant's assessment agreed with the aerodrome operator's view that the Project's initial alignment did not allow for safe overflight and/or manoeuvring room to avoid the overhead line. In each of these cases, re-design of the line was the first option and was successful for both Brook Farm and Thurrock. The line close to Chase Farm was heavily constrained and so collaboration there has focused on aerodrome re-design, to achieve the calculated safe distances. In these cases and the majority of others, aerodrome operators are content that the Applicant's assessment and subsequent line design allows pilots to manoeuvre normally, with minimal or no operational changes. The Applicant recognises the nature of gliding and the absence of definitive obstacle clearance regulation results in some difference in the consideration of safe distances, versus those for powered aircraft. The Applicant understands the authority of the BGA in relation to gliding matters and the Applicant's engagement with that body has recently been focused on agreeing gliding-specific operational parameters (see Appendix A of **8.3.89 Draft Statement of Common Ground - British Gliding Association [Revision B]**). Engagement to date has been productive, with our apparent agreement of several parameters, although we acknowledge the need to confirm this and agree implications for impact assessments

[30] Civil Aviation Authority (2024) *UK Standardised Rules of the Air: Annex I – Rules of the Air, Section 3, Chapter 1 SERA.3105 Minimum Heights*

[31] Civil Aviation Authority (2024) *UK Standardised Rules of the Air: Annex I – Rules of the Air, Section 5 SERA. 5005 Visual Flight Rules*

[32] Civil Aviation Authority (2021) *Official Record Series 4, No. 1496: (UK) Standardised European Rules of the Air – Exceptions to the Minimum Height Requirements*

Reference	Question to	Question	Applicant's Response
			and resulting mitigations, which the Applicant intends to further agree with the operator responsible for specific aerodrome safeguarding (Norfolk Gliding Club in the case of Tibenham). Finally, we wish to emphasise why the Applicant on this Project has been focused on ensuring the agreement of safe, site-specific operational parameters, rather than applying a single, simple generic parameter (such as the 150 m (500 ft) minimum distance rule in SERA and ORS4 1496). The 'minimum distance rule' does not apply to take-off and landing, which are the phases of flight most pertinent to obstacle avoidance in this case and are considered to include the flight path chosen by a pilot when reasonably intending to land or up to the point at which enroute operations commence, after the aircraft leaves the ground. The Applicant's focus on the Project has been to recognise a pilot's requirement to manoeuvre in accordance with normal aviation practice and manage flight safety considerations (including but not limited to collision with any obstacle) and balance those needs with those of the Project. The Applicant position set out on the Project is that any disapplication of the exceptions to ORS4 1496 for take-off and landing would lead to inaccurate assessments that Project impacts on aviation were unsafe due to unacceptable risks, with consequential impacts on the continued operation of aerodromes affected by this Project, as well as wider implications for aerodromes already routinely and safely operating with similar infrastructure in their vicinity. Design decisions with respect to aviation have been based on the experience of operations already co-existing with overhead lines (e.g. Thurrock, Peterborough Sibson, Baxby, Stoke Medway, Elstree and others), as well as international best practice and relevant regulation. The resulting recommendations to aerodrome operators are intended to minimise obstacle collision risk and change to normal operational procedures, by providing calculated

<table>
<tr><th>Reference</th><th>Question to</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>clearances from the Project which are site-specific and based on the accepted principles of aircraft Performance Engineering.
It is expected that, as for operators already co-existing with nearby overhead lines, operators in consideration for this Project will use the impact assessment data provided to inform pilots using their site of the location and characteristics of the obstacle and help them plan their flights so that the obstacle collision risk can be reasonably managed alongside other flight risks, in accordance with normal practice.</td></tr>
<tr><td>SS 2.7</td><td>The applicant</td><td>Tibenham Airfield and low height pylons
Point 5 (third bullet) of the applicant's response to ISH2 action points [REP4-303] considers the use of low height pylons in the vicinity of Tibenham Airfield and Priory Farm
a) Provide further information and an assessment of the disadvantages of using low height pylons in this area
b) Could the use of low height pylons be deemed as appropriate mitigation given the acknowledged risk in this location?</td><td>In response to item a), the Applicant has summarised the additional effects arising from the use of low height lattice pylons between and including pylons RG48 and RG58 within the overall context of counterfactors. The Applicant's response to question LV 2.14 recognises low height lattice pylon characteristics include, wider cross arms, occupying a greater footprint and their bulkier and denser profile. Further information about the differences between standard height and low height pylons, including example images and dimensions, is provided in Section 2 of 7.21 Errata 2024 - Design Development Report for the Project Appendices [REP1-069].
<table>
<tr><th>Topic</th><th>Assessment of Disadvantages</th></tr>
<tr><td>Ecology and Biodiversity</td><td>Lowering the height of pylons would increase the amount of tree and shrub coppicing and pruning for electrical clearance including those in hedgerows. It would mean more features suitable for use by bats and/or confirmed bat roosts would be removed, and more artificial structures need to be provided to mitigate for that loss. The electrical clearance for the 400 kV overhead line between RG048 and RG049 passes through the newly identified County</td></tr>
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	Wildlife Site (CWS) known as Meadow Wood CWS near Cargate Common. This CWS has been identified as of county importance and medium value because it supports ancient wood pasture with veteran trees. Lowering the height of the pylons would affect the number of trees that require pruning and has the potential to negatively affect ancient and veteran trees which are irreplaceable habitat of national importance and high value. Additional mitigation measures to minimise impacts to this CWS would be needed.
Historic Environment	The larger pylon working area would affect more archaeology as the base covers a larger footprint.
Landscape and Visual	Low height lattice pylons can increase adverse visual effects, for example where relatively close to visual receptors without intervening filtering vegetation where they are likely to appear more noticeable in views from residential receptors. The Residential and Visual Amenity Assessment would slightly worsen visual effects for property A13. The assessment of landscape effects on Tas Tributary Farmland and Great Moulton Plateau Farmland would be the same as if there were standard height pylons, however, low height pylons would likely result in an increase in effects at Cargate Common due to their wider span, as recognised in relation to ecology and biodiversity commentary above.

Reference	Question to	Question	Applicant's Response

Other environmental topics	No significant disadvantages.

In response to item b), the Applicant can confirm that low height lattice pylons increase overflight clearance by the reduction in pylon height. Obstacle clearance gradients decrease with low height pylons versus standard lattice pylons, with the degree of this decrease determined by the height reduction and the distance of the line from the take-off point or other gradient origin.

Table A15.2.8 and Table A15.2.11 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]** show that the standard height lattice pylons within the assessed proposed overhead line alignment splays do not infringe take-off or landing Obstacle Limitation Surfaces for Priory Farm or Tibenham aerodromes respectively. The tables also demonstrate that overflight clearances are in excess of the applied minimum vertical overhead line clearance assessment parameter. The justification for lowering pylon height does not exist on this basis. This is further emphasised by the normal magnitude of pylon height reduction, in the order of 10 m (33 ft). For an aircraft in flight, 33 ft does not represent a material change when assessing risk of collision with the line – if it were material, it is likely that the assessed overflight clearance from the proposed overhead line would already be subject to other mitigations. As recognised within Matter 7.6 of **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP4-247]**, marking the top of the line where it is proximate to common aircraft flight paths (e.g. a circuit) could be a suitable mitigation for improving situational awareness of the line and helping pilots to judge overflight clearance, if the visual impact of such marking is acceptable to other relevant stakeholders. We

Reference	Question to	Question	Applicant's Response
			have proposed discussion of this matter to the Priory Farm aerodrome operator. We draw attention to the British Gliding Association (BGA) position within Matter 7.3 of **8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision B]** which states that (for Tibenham aerodrome) additional risk mitigation measures could include reduction to the Project pylon heights. The Applicant position in response states that, notwithstanding the extant position that aircraft clearances of the proposed overhead line are adequate (and substantive design changes are therefore not justified), the consideration of a reduction in the height of the overhead line requires clarity from aviation stakeholders (including the operator) on what clearances would need to be achieved to be acceptable. This clarity is yet to be provided, although, as noted within the Applicant response to SS 2.6 we recognise the need for further engagement with the BGA and the operator to agree the implications of operational parameters in terms of mitigation consideration. The Applicant further notes the response of the operator within **Norfolk Gliding Club ISH2 Written Post-Hearing Submissions [REP4-366]** which makes clear that a reduction to the height of the pylons within the aerodrome safeguarding zone is not sought, with their position remaining the proposed overhead line alignment should be re-located outside the safeguarding zone, or alternatively undergrounded. The operator's continued refusal to engage with the Applicant and the BGA limits the opportunity for collaboration to agree acceptable operational parameters and more reasonable mitigation to residual risk. Aside from Priory Farm and Tibenham aerodromes, paragraph 15.4.21 and Table A15.2.10 of **6.15.A2 Environmental Statement Appendix 15.2Review of Aviation Impact [REP4-161]** describes how and why, in the case of Thurrock aerodrome, the Applicant has

Reference	Question to	Question	Applicant's Response
			implemented design changes to introduce lower height pylons. This is in combination with the re-location and re-orientation of the proposed overhead line alignment to parallel an existing 132 kV overhead line to ensure the proposed Project alignment will benefit from shielding as a result of the predominant obstacle. The impact assessment calculations demonstrate that CAP 168[33] OLS measures are not achieved for either the proposed or existing overhead line, but the operator has confirmed they are content adverse aviation impacts have been minimised as a result of design changes, concurring with the Applicant's assessment that the proposed Project alignment will not be detrimental to the operability of the aerodrome (Matter 6.1 of **5.9.23 Draft Statement of Common Ground – Thurrock Airfield [REP4-097]**). Recognising the potential for allowable localised adjustments to the overhead line Limits of Deviation (LoD) to increase adverse impacts at Thurrock by altering overflight clearance and/or shielding effects in a worst-case scenario, the Applicant is currently confirming formal commitments to reassure the operator in relation to this issue (see Matter 7.1). This example demonstrates the Applicant's position that the use of low height pylons is an appropriate design-based mitigation in justified circumstances where overflight clearances are marginal or where their use ensures other mitigation effects such as obstacle shielding.
SS 2.8	Norfolk Gliding Club/Tibenham Airfield Priory Farm	Low height pylons and mitigation measures Point 5 (third bullet) of the applicant's response to ISH2 action points [REP4-303] considers Tibenham Airfield and Priory Farm.	This question is not directed at the Applicant.

[33] Civil Aviation Authority (2025) *CAP 168: Licensing of Aerodromes*

Reference	Question to	Question	Applicant's Response
		a) The applicant suggests that appropriate mitigation includes the use of marker balls for Priory Farm and changes to competition procedures for Tibenham. Please respond to such suggestions. b) Would low height pylons in the vicinity of the airfields serve to lower the risk of the proposed development?	
SS 2.8	Norfolk Gliding Club/Tibenham Airfield Raydon Wings Aerodrome Priory Farm And any other relevant IP	Applicant's response to action points The applicant's response to ISH2 action points [REP4-303] considers a wide range of matters relating to aviation safety. Please respond to such points.	This question is not directed at the Applicant.

15. Socio-economics, tourism and recreation

Table 15.1 Socio-economics, tourism and recreation

Reference	Question to	Question	Applicant's Response
SET 2.1	Babergh and Mid Suffolk District Councils	Socio-economics In your 'Comments on any further information or submissions received by deadline 1' [REP2-113] concern was raised in regard to the 'cumulative impacts of the proposed development' in relation to the applicant only considering other projects that physically interface with the order limits and the temporal interface of those projects which overlap. You considered other projects not considered by the applicant, as they fell outside of the above criteria, would also be likely to have socio-economic impacts when considered in conjunction with the applicants proposed development. These included i) pressure on the housing markets; ii) social integration; iii) loss of rental accommodation; and iv) pressure on local facilities and resources. The ExA would draw your attention to the applicant's response to your	This question is not directed at the Applicant.

Reference	Question to	Question	Applicant's Response
		deadline 2 submission in its 'Comments on any Further Information or Submissions Received by Deadline 3' [REP4-298]. We would also draw your attention to the applicants document entitled 'ES Chapter 17 Cumulative Effects -Response Update' [REP4-163] and ask whether the applicant's responses in these documents adequately address the socio-economic concerns, as listed above, which you raised. Please note the applicant has indicated an Employment and Skills Plan is to be submitted at deadline 5.	

16. Traffic and transport

Table 16.1 Traffic and transport

Reference	Question to	Question	Applicant's Response
TT 2.1	The applicant	PARs 1 Provide or signpost the ExA to details showing how Ardleigh Road and Bentley Road (PAR31 and 30) will be jointly managed and maintained in association with other NSIPs.	In relation to the **joint management of Ardleigh Road and Bentley Road**, see the Applicant's response to question GEN 1.20 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, which states that the three projects – Norwich to Tilbury (EACN), North Falls, and Five Estuaries – have already proactively coordinated on all matters relevant to final design and potential construction interfaces. This includes: • **Tripartite Position Statement** - setting out jointly developed measures to avoid significant cumulative effects across three key topics: traffic and transport (particularly construction traffic); landscape screening; and operational noise • **Outline Protocol (Onshore Substations Operational Noise and Noise Complaints Protocol)** - confirming that a joint maximum permissible noise level at sensitive receptors has been agreed and apportioned between the three projects • **Parallel DCO requirements and protective provisions** - ensuring consistent and enforceable cross-project controls (including sharing of information and coordination of works) are embedded directly within each scheme's DCO. Norwich to Tilbury, North Falls and Five Estuaries have shared with each other their respective worst case traffic numbers, which fed into the assessment of combined peak construction traffic flows on Ardleigh Road and Bentley Road as a worst case. This assessment fed into the identification of mitigation measures including the proposed improvement to the A120 / Bentley Road junction,

Reference	Question to	Question	Applicant's Response
			proposed widening of Bentley Road, and the Bentley Road NMU Route (Temporary Works). All three projects have been engaging and coordinating on the potential construction traffic management proposals and the volume of construction traffic. All three projects will continue to coordinate around construction traffic flows throughout the construction phase. All three projects have produced Outline Construction Traffic Management Plans, setting out this commitment and how communication will be undertaken between the projects and how construction traffic impacts will be jointly managed. The Applicant has previously signposted in responses TT 1.2 and TT 1.19 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** to the coordination and management mechanisms described in Section 6 of **7.3 Outline Construction Traffic Management Plan (CTMP) [Revision D]**, including cross-project coordination arrangements; a commitment to join and engage with a Developer's Forum; a booking and delivery management system; and forecasting and monitoring of construction traffic flows. These measures are intended to manage overlapping Heavy Goods Vehicle (HGV) activity on shared local routes, including Ardleigh Road and Bentley Road, in association with North Falls and Five Estuaries. **7.3 Outline CTMP [Revision D]** also states that Norwich to Tilbury construction vehicles will use, if it is available, the North Falls and Five Estuaries substation access road within the cable construction corridor between Bentley Road and Ardleigh Road. This would remove construction HGV traffic from a section of Bentley Road and a section of Ardleigh Road. Norwich to Tilbury, North Falls and Five Estuaries have contractually agreed to cooperate on a range of matters to facilitate coordination and joint management of project interfaces, including in relation to highways and access, such as:

Reference	Question to	Question	Applicant's Response
			• Regular coordination meetings • Cooperation and sharing of existing survey data to reduce the number of intrusive surveys • Ongoing information sharing and liaison around interfaces to coordinate works, programming, and minimise cumulative impacts • Use of interface agreements and operating protocols to regulate interface matters including but not limited to the management of construction traffic. In relation to the **maintenance of Ardleigh Road and Bentley Road**, these roads will remain part of the public highway, with Essex County Council retaining responsibility as the highway authority. Where one of the three projects carries out temporary highway works, for example the Bentley Road NMU Route (Temporary Works), it will be responsible for maintaining those works until they are no longer required. Where one of the three projects constructs permanent highway works, for example the A120/Bentley Road junction improvements, it will maintain those works until the Highway Authority becomes liable to maintain them in accordance with that project's Development Consent Order. In addition, the three projects have contractually agreed how any maintenance responsibilities for any highways works will be transferred between the projects should the need arise during construction; that the Bentley Road NMU Route (Temporary Works) will be maintained by one of the three projects for as long as Bentley Road is required for HGV access, after which the land will be reinstated; and that any transfer between projects of the Bentley Road NMU Route (Temporary Works) will be notified to the LPA and Highway Authority. The Applicant has also identified a series of controls relating to road condition and maintenance. These include a commitment in **7.3 Outline CTMP [Revision D]** to undertake pre-construction, interim

Reference	Question to	Question	Applicant's Response
			and post-construction highway condition surveys, and provisions in **3.1 Draft DCO [Revision E]** dealing with street works including repairs to the carriageway (Article 11); agreements with street authorities regarding the carrying out of works (Article 19); extraordinary traffic, damage to the highway and reimbursement of highway authority extraordinary expenses (paragraph 13 of Part 4 of Schedule 16 Protective Provisions).
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.	This question is not directed at the Applicant.
TT 2.3	The applicant	Outline CTMP 1 Further to Royal Mail's DL4 submission [REP4-371] can you explain why paragraph 5.8.5 of the outline CTMP [REP4-174] only requires reasonable endeavours to inform stakeholders of traffic matter, especially in the light of the discussion at ISH2 regarding liaison and provision of this type of information and the changes to the outline CTMP at DL4, including a commitment at 3.3.1 to provide information to residents and stakeholders.	Paragraph 5.8.5 and 5.8.6. of **7.3 Outline Construction Traffic Management Plan [Revision D]** have been updated at Deadline 5 to remove the word 'reasonable' and now state: '*National Grid/the Main Works Contractor(s) will provide advance notice of any proposed temporary road closures or traffic management measures that may affect access to the depot, including details of anticipated impacts on access and response times*. *Advance notification of planned diversions and closures will be issued to relevant stakeholders (such as Royal Mail, Blue Light Services and bus operators) where these may affect their operations, at the earliest possible opportunity.'* In accordance with commitment GG30 in **7.2 Outline Code of Construction Practice [Revision E]**, the Applicant is committed to ensuring that members of the community and local businesses are kept informed regularly of the works through active community liaison.

Reference	Question to	Question	Applicant's Response
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.	This question is not directed at the Applicant.
TT 2.5	The applicant	Outline CTMP 3 The applicant's drivers' pack has explained in greater detail following ISH2 which is very helpful [REP4-303]. The ExA would like further information on the following matters: • Regarding the question 'what does it look like' please explain if the pack is, for example, printed, electronic, via a smartphone app, on a bespoke system or another method. Depending on the answer please explain how the pack will be updated and how will there be certainty that the latest version is being used. • Regarding the question 'is it going to be used every day, by all drivers?' the ExA has some concern about the statement that it will not be feasible or practice to ensure all drivers will read and acknowledge the drivers' pack. This is not how the outline CTMP [REP4-174] is	The Applicant has set out a response to each point raised below. **Format and Version Control of the Driver Information Pack** The driver information pack will operate as a live, working document. Its primary format is expected to be electronic (e.g. PDF and/or a digital platform or app-based format). Adopting an electronic format will facilitate efficient version control, ensuring updates can be clearly tracked, managed, and distributed. **Applicability of the Driver Information Pack to All Drivers** The Main Works Contractor(s) will share the driver information pack with their supply chain(s) and, as this is a live document, any updates will also be shared in real-time to ensure that the most up-to-date version is being used by all supply-chain drivers travelling to site. It is not appropriate or practicable to require that all delivery drivers attending the site have read and acknowledged the driver information pack. This reflects the need to facilitate certain ad-hoc and time-critical deliveries which arise during the construction phase. In addition, some deliveries may be undertaken by third-party courier operators, whose drivers operate on fixed routes and standardised delivery procedures and cannot reasonably be expected to engage with project-specific documentation in advance. It is anticipated that a small proportion of deliveries throughout the construction programme will be reactive in nature. These may not be procured via the core supply chain due to their unplanned and

Reference	Question to	Question	Applicant's Response
		written and the drivers' pack is the basis for almost all of the additional mitigation measures, having exceptions makes this mitigation have weak links. Please provide further consideration on this matter and provide substantive assurances that the mitigation seen and relied on in the drivers' pack will be for all drivers. • Regarding the question 'frequency of review or read/ acknowledge' the last paragraph says that 'the pack is intended to be supplemented by additional mitigation…' Please confirm that this will happen, rather than have a non-definitive statement, and that this will be reflected as such in the deadline 5 update to the outline CTMP. • Bullet point five states 'When there was evidence that drivers were readily failing to follow the rules…'. How will it be known when the rules are not followed?	often urgent requirements. Such deliveries may include, but are not limited to, temporary site infrastructure (e.g. lighting towers and welfare units), office consumables, environmental mitigation materials (e.g. spill kits and silt fencing), and additional trench support or similar equipment required in response to site conditions. These deliveries are expected to be low in volume and are not incorporated within the baseline delivery scheduling. Notwithstanding this, where such deliveries are required, reasonable endeavours will be made by the Main Works Contractor(s) to communicate any key site-specific constraints, access arrangements, and safety considerations to the delivery driver upon arrival or in advance where practicable. The driver information pack is supplementary mitigation to the embedded and additional mitigation such as vegetation clearance and additional signage as detailed within **7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. **Commitment to Additional Mitigation** The driver information pack, proposed as standard mitigation, is supplemented and enhanced by additional mitigation such as vegetation clearance, additional signage and speed restrictions detailed in **7.11 Transport Assessment [APP-333]**, **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **7.3 Outline Construction Traffic Management Plan [Revision D]** (Table 5.7, Table 5.8 and Table 5.9). Section 6.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]** has been updated at Deadline 5 to provide additional information on the driver information pack. This section (contained within Paragraph 6.2.15) now states that the driver information pack will be supplemented by the additional mitigation for pedestrian and equestrian safety and safety near schools identified within **7.3 Outline Construction Traffic Management Plan [Revision D]** (Table 5.7, Table 5.8 and Table 5.9), **7.11 Transport Assessment**

Reference	Question to	Question	Applicant's Response
			[APP-333] and **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. **Monitoring and Identification of Non-Compliance** As noted in Paragraph 6.2.8 (Routeing Adherence) of **7.3 Outline Construction Traffic Management Plan [Revision D]**, the majority of Heavy Goods Vehicles (HGV) vehicles are to be fitted with GPS. Monitoring data obtained from these systems will include, but not be limited to, vehicle routes, timings, and speeds during deliveries. This data will be used to support ongoing compliance monitoring, auditing, and the investigation of any complaints. The Main Works Contractor(s) will be required to ensure a high proportion of HGVs are fitted with GPS so that route compliance can be checked. This data will be reviewed to identify any non-compliance with the driver information pack requirements. In addition, a dedicated contact number will be provided to enable members of the public to report concerns or complaints relating to the Project, including any non-compliance with measures contained within the driver information pack. All construction-related complaints will be recorded by the Main Works Contractor(s) within a formal complaints register, alongside details of the investigation, response provided, and any corrective actions undertaken. To support the identification of vehicles on the Project, an 'identifier' will be placed within the window of all HGV delivery vehicles. The registration numbers for all HGVs making deliveries will also be recorded. Alongside the HGV monitoring device data (where fitted) outlined above, this will allow a check of any reported breaches of measures contained within the driver information pack (such as agreed delivery routes and timings) and enforcement action to be undertaken if required. The Main Works Contractor(s) will issue the driver information pack and Code of Conduct to all supply chain partners during onboarding and expect all supply chain partners to follow the same standards.

Reference	Question to	Question	Applicant's Response
			Paragraph 6.2.9 of **7.3 Outline Construction Traffic Management Plan [Revision D]** additionally details the safety measures that will be monitored and captured. The Main Works Contractor(s) will set out their methods for mitigating, recording and monitoring these within the final CTMP. The non-compliance procedure is detailed within Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision D]**.
TT 2.6	The applicant	Outline CTMP 4 It is noted that the applicant intends to provide an update to the outline CTMP at deadline 5 to give further detail of the drivers' pack, please also provide a sample of the pack to allow the ExA to understand how the commitments will translate into content.	**Section 6.2 of the 7.3 Outline Construction Traffic Management Plan [Revision D]** has been updated with additional detail on the driver information pack. An example of the content of the driver information pack is provided in **Appendix I TT 2.6**.
TT 2.7	The applicant	Outline CTMP 5 In the updated outline CTMP at paragraph 6.3.2, it is stated that sanctions for non-compliance will be included in the final CTMP. How can the ExA and highway authorities understand how robust the implementation of the measures will be if there is no indication at this stage what the result of non-compliance is?	The Applicant acknowledges the request for greater clarity on the proposed sanctions for non-compliance with the Construction Traffic Management Plan (CTMP). At this stage, **7.3 Outline Construction Traffic Management Plan [Revision D]** sets the framework for measures, with detailed enforcement provisions to be secured within the final CTMP. However, to provide assurance on the robustness of implementation, the Applicant confirms that the final CTMP will include a proportionate and enforceable suite of sanctions consistent with those secured on other NSIPs. Examples of sanctions for non-compliance include the following: • Contractual obligations**: The Main Works Contractor(s) and all contractors / sub-contractors will be contractually bound to comply with the CTMP. Breaches will constitute contractual non-compliance and will trigger formal corrective actions, which may include financial deductions and/or removal of offending parties.**

Reference	Question to	Question	Applicant's Response
			• Access and site controls: **Vehicles or drivers failing to comply with CTMP requirements (e.g. approved routes or time restrictions) may be refused entry, suspended, or permanently excluded from the project.** • Escalation: **A structured escalation process will be implemented, including warnings, management intervention, and notification to the relevant highway authority where appropriate.** • Financial disincentives for persistent non-compliance: **Use of financial penalties or deductions for repeated breaches.** These will be refined, and sanctions for non-compliance will be included in the final CTMP. As a result, the sanctions will then be approved by the Local Highway Authorities.
TT 2.8	The applicant	Outline CTMP 5 Provide a full list of schools which will be on PARs and which are proposed to have restriction of construction traffic at certain times of the school day. For those which are not proposed to have restrictions, explain why it is considered not necessary to have such restrictions.	All schools within the Study Area, located within a 150 m radius of the Project Primary Access Routes (PARs), were assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The assessment took into consideration whether the school was directly accessed via the PAR and the existing highway provision along the PAR, e.g. the width of footway and separation, pedestrian crossing provision, existing warning signage, parking restrictions and potential for localised congestion. From this review it was identified that seven schools would be directly accessed via a PAR: • Freeman Primary School, Suffolk: PAR 16 - A1120 Church Road / A1120 Bell's Lane • Margaretting CofE Primary School, Essex: PAR 54 - B1002 Main Road. • Quilters Infant and Junior School: PAR 58 - A176 Noak Hill Road / A176 Laindon Road / A129 Southend Road) • The Billericay Secondary School: PAR 58 - A176 Noak Hill Road / A176 Laindon Road / A129 Southend Road)

Reference	Question to	Question	Applicant's Response
			• Cressing Primary School, Essex: PAR 41 - B1018 Braintree Road / B1018 Witham Road • Maltings Academy Secondary School: PAR 43 - Spinks Lane / Highfields Road / Spa Road / Flora Road / Faulkbourne Road / Church Hill). • Powers Hall Academy Primary School: PAR 43 - Spinks Lane / Highfields Road / Spa Road / Flora Road / Faulkbourne Road / Church Hill). The need for additional mitigation (over and above embedded and standard Mitigation) was only identified for the following two schools: • Freeman Primary School, Suffolk: PAR 16 - A1120 Church Road / A1120 Bell's Lane • Margaretting CofE Primary School, Essex: PAR 54 - B1002 Main Road. On the above PARs, construction vehicles would avoid school drop-off and pick-up times as secured within Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. This mitigation was considered appropriate at these two schools to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and potentially high congregations of pupils and parents outside the school pedestrian entrance(s) during the drop-off and pick-up periods where footways were considered narrow and evidence of kerbside parking was identified. The remaining five schools that have a direct access to PARs, but where restrictions on construction movements are not considered necessary based on the Applicant's assessment within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** were all located within Essex. From the Applicant's review, it was identified these schools did not have the same level of risk due to the presence of existing local

Reference	Question to	Question	Applicant's Response
			infrastructure (e.g. pedestrian crossings, wide or separated footways, alternative accesses on nearby roads, available drop-off areas within or near to the school grounds and existing school children ahead warning signs). Furthermore, due to the low expected Project construction traffic during the predicted peak weeks of the construction programme and the reduced risk associated with the level of interaction between construction vehicles and vulnerable users. The Applicant considers that restricting HGV movements during school drop-off and pick-up periods is not necessary at the follwoing schools for the reasons detailed below: • Quilters Infant & Junior School and The Billericay School (secondary school) – A129/A179: Seven HGVs (seven movements one-way) a maximum of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic • Cressing Primary School – B1018: Eight HGVs (16 two-way movements) a maximum of one HGV approximately every four minutes and a net increase of 1% of total traffic • Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: Nine HGVs (18 two-way movementsa maximum of one HGV every three minutes and a net increase of 2% of total traffic. However, in response to ongoing discussions with Essex County Council on their concerns raised on road safety, the Applicant has discussed undertaking further site observations on the PARs at the schools listed above during school drop-off and pick-ups to confirm site conditions. The Applicant will keep this matter under review and will continue to discuss it with Essex County Council as part of the SoCG.

Reference	Question to	Question	Applicant's Response
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.	The Applicant considers the Suffolk County Council proposal appropriate and reasonable, and has committed to a quarterly report, including many of the matters requested to be reported on by Suffolk County Council, contained within **7.3 Outline Construction Traffic Management Plan [Revision D]** and **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision B]**. As detailed within these documents, the commitment is secured through Requirement 4 of Schedule 3 of **3.1 Draft DCO [Revision E]**.
TT 2.10	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk 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.	This question is not directed at the Applicant.
TT 2.11	The applicant	Cap on HGVs Provide examples of consented NSIPs which have put a cap on HGVs and explain how these compare with the proposed development.	**Introduction** The Applicant has not, in the time available, undertaken a review of all consented DCOs. Instead, a proportionate sample of consented single-site and linear NSIPs have been selected for consideration which, in the professional experience of its technical team, represent an objectively sound comparison, whether by virtue of the nature of the development or by virtue of geographic proximity. **Consented single-site NSIP with vehicle caps in place** The Sizewell C Project [EN010012] represents an example of a consented NSIP where a numerical HGV cap has been applied, reflecting the specific characteristics of a single, fixed construction

Reference	Question to	Question	Applicant's Response
			site. The Sizewell C Project incorporates a maximum daily limit on construction HGV movements to/from the main development site and the wider highway network. Consent for the Sizewell C Project was granted on 20 July 2022. Document 8.7 Construction Traffic Management Plan - Revision 2.0 [REP2-054] in the Sizewell C Project documentation [EN010012] sets out how the HGV limits were derived, based on the forecasts contained within the 8.5 Consolidated Transport Assessment [REP4-005] in the Sizewell C Project documentation [EN010012]. The limits are applied to all HGV movements arriving at and departing from the main development site and are monitored through a delivery management system. These include daily HGV movement limits for weekdays and Saturdays, with no HGV movements permitted on Sundays or public holidays. A comparable approach was adopted for another large, single-site NSIP - Hinkley Point C New Nuclear Power Station [EN010001] - consented on 19 March 2013. The Hinkley Point C Development Consent Order secures compliance with an approved Construction Traffic Management Plan, within which a numerical cap on daily HGV movements on construction HGV movements is set out. While this approach was applied to the Sizewell C and Hinkley Point C projects, the Applicant does not consider it either necessary or practicable for the Norwich to Tilbury Project. This is primarily due to the fundamentally different characteristics of the scheme. Both the Sizewell C and Hinkley Point C projects are located at a single site, allowing a project-wide vehicle cap to be monitored and managed more appropriately and effectively. By contrast, the Norwich to Tilbury Project is a linear scheme extending over a wide geographic area and several local authorities, with multiple construction and site access point locations. Construction traffic will therefore be spatially dispersed and will vary over time as works progress along the route, due to the nature of construction. A single project-wide vehicle cap (as applied for Sizewell C and Hinkley

Reference	Question to	Question	Applicant's Response
			Point C New Nuclear Power Station) would not provide a meaningful control on localised impacts and would be difficult to enforce in practice. **Consented linear NSIPs with no vehicle cap in place** The Applicant's approach is consistent with consented linear NSIPs (Bramford to Twinstead [EN020002] and Lower Thames Crossing [TR010032]). The Applicant has adopted similar mitigation measures for the number of HGV vehicles against those assessed, to those accepted within the Bramford to Twinstead examination (detailed within the Bramford to Twinstead Construction Traffic Management Plan [REP8-018]). The Examining Authority on that project was satisfied that the monitoring and compliance within the CTMP would provide a suitable checking process for the highway authorities to identify short-term impacts attributed to actual traffic numbers per access exceeding the assumed worst case. This is detailed in paragraph 3.15.130 of the Examining Authority's Recommendation Report for the Bramford to Twinstead Reinforcement[34]. As stated in paragraph 3.15.136 of that report, '*Given the robust arrangements that would be available to monitor and review these traffic movements and the non-significant road network performance and safety impacts set out in the TA and ES, the ExA finds no reason to recommend a cap on vehicle numbers*'. Consent for the Bramford to Twinstead Reinforcement scheme was granted on 12 September 2024. Similarly, the Lower Thames Crossing, consented on 25 March 2025, does not include a project-wide cap on HGV movements. Lower Thames Crossing [TR010032] document 7.4 Outline Traffic Management Plan for Construction [REP9-235] instead secures phased, route-based management, monitoring, and mitigation of construction traffic in consultation with highway authorities. The

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

Reference	Question to	Question	Applicant's Response
			consented Lower Thames Crossing approach demonstrates that robust assessment, mitigation, and monitoring in consultation with highway authorities can provide an effective and proportionate alternative to a vehicle cap. A further example of a linear scheme with no explicit project-wide vehicle cap is the A428 Black Cat to Caxton Gibbet Improvement Scheme [TR010044], consented on 18 August 2022. The A428 Black Cat to Caxton Gibbet Improvement Scheme 7.4 Outline Construction Traffic Management Plan [REP10-020] places an emphasis on route restrictions for construction vehicles, monitoring and responsive mitigation, rather than fixed vehicle limits. **Consented linear NSIP with vehicle caps in place** The Applicant has reviewed the Norfolk Vanguard project [EN010079], which is considered to be linear and in close proximity to the Norwich to Tilbury project. Consent for the Norfolk Vanguard project was granted on 11 February 2022. The Norfolk Vanguard 8.8 Outline Traffic Management Plan sets out capped HGV routes for the Norfolk Vanguard project and also presents capped HGV routes Norfolk Vanguard cumulatively with Hornsea Project Three. The vehicle caps are route / access based. The Norfolk Vanguard project proposes the use of a booking system for deliveries to ensure compliance with the assessed HGV movements. Compliance with the Norfolk Vanguard 8.8 Outline Traffic Management Plan is set out in Requirement 21 of the Norfolk Vanguard Development Consent Order. However, Norwich to Tilbury is a much larger onshore project than Norfolk Vanguard, with the Norfolk Vanguard onshore cabling section extending to approximately 60 km. Norfolk Vanguard is also delivered within a single Local Highway Authority (Norfolk County Council), whereas the Norwich to Tilbury Project extends across multiple highway authorities.

Reference	Question to	Question	Applicant's Response
			Conclusion From a desk-based assessment of consented NSIPs, the Applicant has concluded that there is a set precedent for the implementation of vehicle caps for single site projects (Sizewell C and Hinkley Point C). By contrast, for linear infrastructure projects (Bramford to Twinstead, Black Cat and Lower Thames Crossing), there is no consistent precedent. For linear schemes, albeit smaller in length than Norwich to Tilbury, with Bramford to Twinstead approximately 29 km in length, consented practice demonstrates that robust assessment, monitoring, and management provide an effective and proportionate alternative to a vehicle cap, which the Applicant considers appropriate for the Project. The Project is over 100 km longer, where the approach of monitoring and management is appropriate. While Norfolk Vanguard provides a linear project example of route and access-based caps, it relates to a shorter onshore route (approximately 60 km) and is delivered within a single Local Highway Authority only which therefore is not considered to be a directly comparable precedent for a scheme of the scale and complexity of Norwich to Tilbury. The Applicant considers that the imposition of a cap on construction vehicle numbers would present a material risk to the delivery of the Project, particularly if set at an unduly restrictive level, and jeopardise the ability to meet the Government's target for Project delivery by 2030. Also, the absence of clarity as to the level at which any cap might be set introduces a significant degree of uncertainty into programme planning and construction sequencing. This uncertainty undermines confidence in the achievability of the programme and could adversely affect the overall deliverability of the Project. The Applicant has provided further detail on the approach to monitoring and management of construction HGVs in response to Action Point 45 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**.The Applicant proposes a

Reference	Question to	Question	Applicant's Response
			robust approach in active vehicle monitoring and mitigations, with consultation with Local Highway Authorities (as detailed within **7.3 Outline Construction Traffic Management Plan [Revision D]**). This enables any variation in vehicle volumes compared to those assessed within the robust assessment of the Environmental Statement and Transport Assessment to be identified and proactively managed with the Local Highway Authorities, where and when they arise, rather than through a blanket numerical cap.
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.	The expectation for structural assessments along the AIL routes is that these will be completed by the Main Works Contractor(s) and agreed in principle with the asset owners prior to DCO determination. Post DCO determination, the Main Works Contractor(s) will confirm the final vehicle selection, origin location, and subsequent delivery route via the ESDAL (Electronic Service Delivery for Abnormal Loads) system, which will notify the various stakeholders, police forces and asset owners of the proposals. The use of the ESDAL system is secured within Paragraph 5.2.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. If structural assessments confirm a structure is unable to accommodate the required AIL vehicles, the Main Works Contractor(s) will consider a range of engineering solutions or other measures such as strengthening of the existing structure, carriageway resurfacing or management of traffic speeds and flows. If there is still a residual issue, alternative AIL delivery routes avoiding those structures would be considered. The Applicant has included provisions in **3.1 Draft DCO [Revision E]** to enable the above measures to be implemented, including: • Article 11(2) street works • Article 19 agreements with street authorities • Article 21 protective works

Reference	Question to	Question	Applicant's Response
			• Schedule 1 (list of associated development) • Schedule 16 protective provisions. Paragraph 5.2.2 in **7.3 Outline Construction Traffic Management Plan [Revision D]** details that should a structural assessment fail, the route will be reviewed and adjusted.
TT 2.13	The applicant Essex Police Suffolk Constabulary	AILs 2 Since ISH2 and submissions at deadline 4, please update the ExA on engagement between the applicant and the joint forces regarding AILs and update the ExA on any further discussions that may have taken place since the deadline 4 submissions.	Following ISH2, the Applicant met with the Joint Police Forces on 8 May 2026 to discuss AIL arrangements, funding mechanisms, information sharing and liaison, and updates to be made to the Deadline 4 draft Statements of Common Ground. Since the Deadline 4 submissions, the Applicant and the Joint Police Forces met on 8 June 2026 to discuss a legal agreement between the parties. A meeting has also arranged for 12 June 2026 to discuss AIL arrangements and updates to be made to the draft Statements of Common Ground at Deadline 6. The Deadline 5 draft Statements of Common Ground have been updated to reflect engagement and discussions between the Applicant and the Joint Police Forces.
TT 2.14	The applicant	AILs 3 If AIL routes are not finalised, or structural assessments are not completed before the close of the examination, what assurances do the ExA have that they will be concluded in time to permit the 18 month lead-in period for the joint forces? Also explain what the proposal will be if the timescale is not met.	From discussions it has had with the Police Forces, the Applicant understands that the key information that they require to stand up resources is AIL numbers, delivery dates, ports of origin and specific routes. The Deadline 5 draft SoCGs outline that AIL numbers, delivery dates, ports of origin and specific routes will be sufficiently defined and provided to Essex Police/Suffolk Constabulary in Q1 2027, to ensure that an appropriate lead-in period of 18 months is available in line with the Joint Police Forces' requirements. Note, AIL movements will be phased between 2028 and 2030, meaning that some routes may only be required later in the construction programme. The expectation for structural assessments along the AIL routes is that these will be completed by the Main Works Contractor(s) and

Reference	Question to	Question	Applicant's Response
			agreed in principle with the asset owners prior to DCO determination. Note, there will be a further four-month period between close of the Examination and Q1 2027 where assessments can be completed should the need arise. If the structural assessments find a potential AIL route is not suitable, the Applicant and/or its Main Works Contractor will investigate alternatives such as engineering solutions, alternative routes, and using the temporary haul road to move AILs to where they are required. These measures will ultimately be presented to and agreed with the various stakeholders, including the Joint Police Forces, asset owners and streets authorities, through ongoing engagement and the ESDAL system. Anticipated bridge mitigations which could be required have been set out in the response to 2.12 above, meaning it is highly probably that the routes proposed within **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** will be selected. In the unlikely scenario that a particular AIL route was found to be unsuitable following completion of the structural assessments, and no other alternative routes involving the haul road or otherwise could be easily ascertained, the Applicant and/or its Main Works Contractor would seek to engage with the Joint Police Forces, including to explore the possibility of agreeing specific and targeted variations to the 18 month lead-in period.
TT 2.15	The applicant Network Rail	Network Rail The SoCG with Network Rail [REP4-099] states that crossing agreements are progressing, will these be complete by the close of the examination and if not, how can the ExA be assured that they will be completed and how is this secured in the draft DCO	Crossing Agreements are subject to details obtained through significantly advanced detailed design works and so it is not anticipated nor intended that these agreements be completed within the Examination window. Bespoke protective provisions are currently being negotiated with Network Rail, which will require the Applicant to enter into an Asset Protection Agreement with Network Rail post-examination and prior to carrying out the relevant works, ensuring that Network Rail is content with the details of the crossing of its assets.

17. Water environment – flood risk, hydrology and drainage

Table 17.1 Water environment – flood risk, hydrology and drainage

Reference	Question to	Question	Applicant's Response
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]**.	This question is not directed at the Applicant.
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.	This question is not directed at the Applicant.
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.	This question is not directed at the Applicant.

Appendix A.
GEN 2.2

nationalgrid

Appendix A
GEN 2.2

Table A.1 GEN 2.2 part a) An update to the table provided in Appendix E of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Landscape and visual						
Tree replanting	Norfolk County Council – 6.4, 6.22, 6.25 Suffolk County Council and Babergh and Mid-Suffolk District Councils – 13.229 Chelmsford City Council – 9.26 Thurrock Council - p5	Multi-authority planning obligation – s106 or similar	To secure off-site tree planting	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering 3:1 tree replanting for individual trees and individual trees in small groups. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's 3:1 commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. There are no obligations on the Local Planning Authorities as a result of the	Yes – all	The Heads of Terms for the unilateral undertaking was shared with the Local Planning Authorities in August 2025, and comments will be taken into consideration in the drafting of the detailed agreement. The Applicant is currently drafting the detailed unilateral undertaking to share with the Local Authorities for their comments and expects to share it with the Local Authorities shortly after Deadline 5.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				agreement which would more readily suit a bilateral agreement. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver on the commitment or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.		
Biodiversity Net Gain (BNG)	Norfolk County Council – 6.4, 6.22, 6.25	Multi-authority planning obligation – type of agreement not specified	To secure BNG	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% BNG. This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG will be	Yes – all	The Heads of Terms for the unilateral undertaking was shared with the Local Planning Authorities in August 2025 and comments taken into consideration in the drafting of the detailed agreement.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				secured through legal agreements (either s106 agreements or conservation covenant agreements) between the appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable). The Applicant shall then acquire biodiversity units from these landowners. The s106 unilateral undertaking intended to be given by the Applicant to the Local Planning Authorities will not itself secure the management and maintenance of any off-site BNG. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's BNG commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. As BNG		The Applicant has provided the Local Planning Authorities a draft of the detailed unilateral undertaking for review and requested comments to be provided by 12 June 2026.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				is being provided as a voluntary commitment, there is no need to place any obligations on the Local Planning Authorities. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver a 10% BNG or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.		
Landscape enhancements	Norfolk County Council – 6.4, 6.22, 6.25, 11.2, 11.31 Suffolk County Council and Babergh and	Multi-authority planning obligation – type of agreement not specified	To secure funding contributions to landscape scale restoration/enhancement projects	The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's Comments on Local**	No – ask should be justified on a case-by-case basis	The Applicant maintains the position set out recently in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant however sought further detail

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
	Mid Suffolk District Councils – 13.159 Essex County Council – 4.10.43			**Impact Reports [REP2-030]**. Notwithstanding the Applicant's position, the request is limited in detail; therefore, the Applicant is seeking to understand the request in more detail and their justification for it. At present, given the Applicant's position on the requirement for landscape compensation, it is considered that such an obligation would not meet the legal tests by virtue of not being necessary to make the development acceptable. Without further detail on the request, it is not possible at this stage to state whether the obligation would meet the other legal tests.		regarding this request from the Local Planning Authorities recognising Action 27 from Issue Specific Hearing 2 (ISH2). Norfolk County Council, Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council and Thurrock Council responded, and the Applicant held meetings with the Councils in relation to the compensation sought to understand the ask and justification for the ask further. Further detail on this work has been provided in response to written question LV 2.17 and in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [Revision A]**.
Landscape and visual compensation	Essex County Council – 4.10.43, 4.4.64	Not specified	To secure a substantial funded landscape and visual	The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of **8.8.2 Applicant's**	No – request should be justified on a case-by-case basis	The Applicant maintains the position set out recently in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
	Colchester City Council – 12.116 Chelmsford City Council – 8.441, 8.544, 9.22, 11.39 Brentwood Borough Council – 6.64		compensation scheme	**Comments on Local Impact Reports [REP2-030]**. Notwithstanding the Applicant's position, the request is limited in detail; therefore the Applicant is seeking to understand the request in more detail and their justification for it. At present, given the Applicant's position on the requirement for landscape compensation, it is considered that such an obligation would not meet the legal tests by virtue of not being necessary to make the development acceptable. Without further detail on the request, it is not possible at this stage to state whether the obligation would meet the other legal tests.		**Specific Hearing 2 [REP4-302]**. The Applicant however sought further detail regarding this request from the Local Authorities recognising Action 27 from ISH2. Norfolk County Council, Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council and Thurrock Council responded, and the Applicant held meetings with the Councils in relation to the compensation sought to understand the ask and justification for the ask further. Further detail on this work has been provided in response to written question LV 2.17 and in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [Revision A]**.
Compensation	Norfolk County Council – 11.31	Not specified	To secure funding for the Waveney	The Applicant is currently engaging with Suffolk Wildlife Trust on the Waveney and	No – geographically and Project	The Applicant maintains the position set out recently in **8.5.7 Applicant's Written**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			and Little Ouse Recovery Project	Little Ouse Recovery (WaLOR) project on the potential delivery of biodiversity units within the WaLOR project. The commitment to and delivery of BNG is to be secured by a unilateral legal agreement (see the second row in this table on BNG). Through delivery of BNG, suppliers will be asked to confirm that they can deliver a range of biodiversity gains, that deliver wider environmental and societal benefits. It is therefore considered that the purchase of biodiversity units from the site, in line with the Applicant's ambition, will yield stacked benefits which will benefit the locality and wider scheme.	specific request	**Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant however sought further detail regarding this request recognising Action 27 from ISH2 and held a meeting with Norfolk County Council and Suffolk County Council on 22 May 2026 in relation to the compensation sought to understand the ask and justification for the ask further. Further detail on this work has been provided in response to written question LV 2.17 and in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [Revision A]**.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Socio-economics, recreation and tourism						
Skills and Employment Plan	Suffolk County Council and Babergh and Mid-Suffolk District Councils – 10.7, 10.40	Requirement or s106	To secure a Skills and Employment Plan to deliver: Phase-by-phase workforce modelling Apprenticeship targets Social value measures	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. No legal agreement through a s106 is required.	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed.
Workforce skills training	Suffolk County Council and Babergh and Mid Suffolk	s111 agreement	To secure workforce skills training	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
	District Councils			commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. No legal agreement through s111 is required.		meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.
Employment, Skills, Education and Supply Chain Strategy	Essex County Council – 2.5.12, 4.8.28, 4.8.29, Colchester City Council – p150-152 Braintree District	s106	To secure an employment, education, skills and supply chain strategy and appropriate funding	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
	Council – 17.1.7			to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is required.		ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.
Support for existing projects and programmes	Essex County Council – 4.8.31	Not specified	To secure support for: Sustainable Skills Innovation Centre Destination Renewables Programme or similar Skills Bootcamps Connect to Work	The Applicant will consider the applicability of engaging with these projects/programmes when developing the Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a	Depends on programme/project	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			Essex Levy Transfer Service Grid for Good Programme Tendring Future Skills Programme Technical Excellence College Status bid for energy Apprenticeship Grant Programme Harwich Innovation Centre/Hub Supply Chain Portal to be launched March 2026 Employment brokerage service to be launched in 2026	DCO Requirement to be added into the Draft DCO. Supporting existing projects/programmes relating to employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is required.		preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.
Skills, education and employment	Colchester City Council – page 153	Not specified	To secure the following: • Work with local further education	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			providers to invest in and support the development of training and skills programmes. • Contractual targets to create local jobs. • Apprenticeship target, shaped to reflect local economic strategy. • A financial contribution to enable local authorities to target those furthest from employment. • Contractual targets to create local jobs'	the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. No legal agreement through s106 required. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits.		to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Skills, education and employment	Tendring District Council – 21.4	Not Specified	To secure • Local Apprenticeships & Traineeships: time-bound, numbered places (including priority for NEETs and disadvantaged groups), tied to construction phases and contractors, with audited outputs. • Local Labour & Procurement: percentage targets and £ value for Tendring-based SMEs and VCSEs, broken down by package, with quarterly publication and	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. No legal agreement through s106 required. Supporting employment, education	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			independent verification. • Education & Provider Partnerships: binding arrangements (e.g., with Colchester Institute, schools/FE providers) that deliver accredited pre-employment training, site-ready cards and guaranteed interviews, again quantified and reported. • Monitoring & Enforcement: a DCO Requirement (and/or S.106-style obligation) with KPIs, baselines,	and skills development will also be considered separately outside the development consent process through community benefits.		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			milestones, and sanctions/withholds for non-performance. (The Examination Library currently contains no such secured mechanism for N2T)			
Skills	Braintree District Council – 17.1.6 Chelmsford City Council – 8.493	Not specified	To secure a skills fund to be used to: • Invest in local further education facilities and provision • Sport employment and skills programmes relevant to the construction and energy sectors • Enhance careers	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. The Applicant emphasises that such a response to social value is	Yes	The Applicant submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to them for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			education and school engagement • Fund local authority officer resource required for engagement, monitoring and oversight of the employment and skills strategy'.	presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits.		**Consent Order [Revision E]**. No legal agreement is being progressed as this is not required.
Local Business Coordinator	Colchester City Council – 14.24		To fund a local business coordinator role	Members of the community, local businesses and local stakeholders will be kept informed regularly of the works through active community liaison see commitment GG30 in the **7.2 Outline Code of Construction Practice [REP2-014]** to be secured via DCO Requirement 4. As such, the Applicant does not consider a planning obligation to fund a Local Business Coordinator is fairly	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				or reasonably related in scale and kind to the development. Any planning obligation must be in accordance with the legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010.		
Traffic and Transport						
Highway Authority resource	Suffolk County Council – 12.148	Planning Performance Agreement (PPA)	To secure funding for Highway Authority resourcing	The Applicant has begun discussions with the host Local Highway Authorities and National Highways on the recovery of appropriate costs through a PPA.	All host Local Highway Authorities and National Highways	The Applicant is continuing to liaise with host Local Highway Authorities and National Highways on this matter.
Police resource	Suffolk County Council – 12.148 Colchester City Council – 14.18, 14.19	Not specified	To secure funding for the Police resource in relation to AILs	The Applicant has held regular meetings with Essex Police and Suffolk Constabulary and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for Abnormal Indivisible Load (AIL) escorts.	Yes – Essex Police	The Applicant's legal representatives have arranged a meeting in June 2026 with the legal representatives of Essex Police and Suffolk Constabulary to discuss a legal agreement.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Framework Highways Agreement	Essex County Council – 5.1.8 Colchester City Council – p168, p189 Thurrock – p4 (DCO comments table)	A section 278 agreement under the Highways Act 1980	To manage the design approvals	It is the Applicant's understanding that the highway authorities are seeking a joint highways framework agreement (a section 278 agreement under the Highways Act 1980) in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination.	All host Local Highway Authorities	The Applicant is continuing to liaise with host Local Highway Authorities on this matter.
Road Condition Surveys	Tendring District Council – 12.16	Not specified	To secure a contribution to road condition surveys and post construction repairs on all affected rural lanes and A-routes in Tendring	Paragraph 13 of Part 4 of Schedule 16 to **3.1 Draft Development Consent Order [Revision C]** outlines the Applicant's approach to extraordinary traffic with regards to condition surveys and reimbursement of expenses. This specifies that the repair of any damage that is directly attributable to the Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense.	Yes	No legal agreement on these matters is being progressed as they are addressed by **7.3 Outline Construction Traffic Management Plan [Revision D]** and **3.1 Draft Development Consent Order [Revision E]**.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any extraordinary expense, the relevant highway authority may have recourse to Section 59 of the Highways Act 1980 in the usual way. In relation to road condition surveys, **7.3 Outline Construction Traffic Management Plan [Revision B]** to be secured via DCO Requirement 4, sets out that the Applicant proposes to undertake pre- and post-construction condition surveys of the existing highway network on AIL and Heavy Goods Vehicle (HGV) routes.		
Construction traffic and noise controls	Tendring District Council 14.16	Not specified	To secure construction traffic/noise controls for Bentley Road and	The Applicant is committing to employing best practicable means (BPM) to reduce the effects of construction noise and vibration. Specific	No	No legal agreement is being progressed as these matters are addressed by the management plans to be secured by **3.1 Draft**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			adjacent lanes including: • Capped daily HGV flows, time-of-day restrictions, no evening/night HGVs, and advance works black-outs during sensitive periods (e.g., school runs). • Mandatory low-noise surfacing, temporary traffic calming, and on-plot acoustic protection (temporary or permanent) where modelled/monitored triggers are exceeded. • Real-time noise and vibration monitoring at agreed	mitigation measures will be determined following detailed construction and noise and vibration assessments by the Main Works Contractor(s), as per commitment NV05 of **7.2 Outline Code of Construction Practice [REP2-014]** be secured via DCO Requirement 4. Mitigation in the form of BPM will be identified and employed to avoid potential significant adverse effects and reduce potential adverse effects as per the range of commitments in **7.2 Outline Code of Construction Practice [REP2-014]** and **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]** to be secured via DCO Requirement 4.		**Development Consent Order [Revision E]** Requirement 4 as previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			receptors with publication dashboards and automatic stand-down/escalation protocols tied to numeric thresholds.			
Health and wellbeing						
Local community assets	Suffolk County Council and Babergh and Mid Suffolk District Councils – 17.90	Not specified	To secure investment in local community assets (public spaces, village halls or community organisation)	In line with government guidance (Community Funds for Transmission Infrastructure: Guidance[35]), the Applicant expects to invest in community benefits to support communities near our Norwich to Tilbury proposals. We are currently developing our approach to community benefits, and in spring 2026, we plan to begin consulting on how the community benefit funds should be used. Throughout that consultation, we will	Yes	No legal agreement on this matter is being progressed for the reasons previously outlined.

[35] Department for Energy Security and Net Zero (2025) Community Funds for Transmission Infrastructure: Guidance

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				engage with local communities and elected representatives to find out more about local priorities and where community benefits could deliver long-lasting benefits. The feedback we receive will help shape and inform our approach to community benefits. Following the consultation, we will develop a community benefit programme to address key themes and priorities. While community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime.		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				In terms of how a community benefit fund would operate, we will outline an application process for funding following the consultation process. For the avoidance of doubt, community benefits funding is not a material consideration and is separate to the development consent process. No legal agreement required as part of development consent.		
Mental Health	Suffolk County Council and Babergh and Mid Suffolk District Councils – 17.90	Not specified	To fund local mental health organisations providing Mental Health First Aid training for community members and promoting resources such as East Suffolk Council's WellMinds.	There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified. Table 10.14 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** contains the findings from the assessment of potential impacts on mental health and wellbeing during the construction phase and includes opportunities for mitigation such as	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				appropriate communication and awareness-raising of construction activities.		
Health and wellbeing monitoring framework	Tendring District Council – 14.17	Not specified	To secure a health and wellbeing framework which includes: A co-designed baseline and monitoring programme (with TDC, ICS/Public Health, local practices and community reps) covering sleep disturbance, stress/anxiety indicators, complaint analytics, PRoW usage and access to services, with quarterly public reporting and mitigation "triggers".	In regard to comments made relating to a Health and Wellbeing Monitoring Framework, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. As such the Applicant does not consider a planning obligation to secure a health and wellbeing framework meets the legal tests.	No	The Applicant has added a new commitment in the latest iteration of **7.2 Outline Code of Construction Practice [Revision E]** submitted at Deadline 5. Commitment GG37 states that '*Active community liaison will form part of the approach to managing community stress and anxiety over the pre-construction and construction periods. In addition to the detailed communication strategy referred to, a robust and accessible complaints procedure will be developed. Information relating to complaints (e.g. theme, type of action and speed of escalation) will be reported regularly and used to help understand where additional communication approaches*

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
						or other action may be required.' No legal agreement on this matter is being progressed for the reasons previously outlined.
Safe movement package	Tendring District Council – 14.18	Not specified	To secure a PRoW, NMU and safe movement package including: • Mapped, fully segregated NMU routes where HGVs intersect with everyday pedestrian/horse-rider movements; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes.	The Applicant responded, on pages 744-745 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, to Tendring District Council's request for a safe movement package including mapped, fully segregated NMU routes; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes; and micro-grants. The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding these matters. The Applicant considers micro-grants for community	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• Micro-grants for community route guardianship, wayfinding, and rural wellbeing walks during construction phases.	route guardianship, wayfinding and rural wellbeing walks during construction could be considered through community benefits. Community benefits are separate from and not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order. We are currently developing our approach to community benefits, and in spring 2026, we plan to begin consulting on how the community benefit funds should be used.		
Psychosocial support and EMF commun-ications	Tendring District Council – 14.19	Not specified	To secure targeted Psychosocial Support & EMF Communications which include: • Independent, clinician-led drop-ins and	The Applicant's approach to engagement for the construction phase is currently outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public**	Yes	The Applicant updated the text in relation to EMFs in **7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public Information [REP4-168]** at

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			fast-tracked signposting for construction stress and sleep problems; evidence-based EMF engagement with accessible materials, local Q&A sessions, and named liaison for Tendring residents	**Information [APP-305]**, which confirms that the Project website will be maintained and managed by a community relations team to enable up-to-date information to be provided to stakeholders, including provision of Project updates, information relating to a free Project hotline, Project email and freepost address, publication of Project contact details in newsletters, and provision of the same details on boards around the perimeter of construction sites in locations where they would be visible to the public. The Applicant suggests the following wording will be added to the Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] in relation to EMFs: • The Applicant is committed to ensuring that		Deadline 4 (see paragraphs 1.1.8 and 1.1.9). No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice • With regard to EMFs specifically, and in recognition of the importance of clear communication and scientific evidence, the Applicant will provide accessible, clear, and up-to-date information about EMFs, their nature, and the scientific consensus that EMFs at levels associated with the Project do not pose a health risk, in the following ways:		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				– Hosting the latest information and FAQs on the Project website, also signposting to www.emfs.info as well as links to trusted health authorities (such as the World Health Organisation) and scientific bodies – Preparing and sharing an up-to-date information factsheet (alternative formats would be prepared upon requests) with key contacts along the route to facilitate access – Responding to queries via our usual channels of communication (hotline, email address, freepost) The above approach is considered to be proportionate and appropriate, taking into		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				account the communication needs of local communities and setting out a range of methods of communication to support hard-to-reach groups. The Applicant will review their approach regularly in light of evolving needs and consider if any other methods of communication could also be beneficial in addition to the above.		
Community Liaison and Complaints Resolution	Tendring District Council – 14.20	Not specified	To secure a single, visible Tendring liaison team, minimum service standards (response times, case tracking), and binding escalation to pause activities if agreed noise/traffic limits are breached pending remedial action.	In relation to community liaison, **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. The Applicant considers the approach for engagement	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				with the community and stakeholders during construction as set out in commitment GG30 in the **7.2 Outline Code of Construction Practice [REP2-014]** is precise, enforceable and reasonable in all other respects to be secured via DCO Requirement 4.		
PRoW promotion	Thurrock – 6.8.36	Not specified	To secure funding to be coordinated with a Recreation and Leisure Management Plan to engage local communities in the use of PRoWs and green/open spaces	The Applicant considers that the request for PRoW promotion falls outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance[36].	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

[36] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Noise and vibration						
Noise and vibration liaison officer	Tendring District Council – 13.24	Not specified	To secure funding for a named and dedicated Tendring noise and vibration liaison officer	The Applicant does not consider this necessary. **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** to be secured via DCO Requirement 4 explains that community liaison, including notification of noisy works and/or activities anticipated to be conducted outside of core working hours, and construction-related complaints will be the responsibility of the Applicant and Main Works Contractor(s). A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project and all construction-related complaints will be logged by the Main Works	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				Contractor(s) in a complaints register, together with a record of the responses given and actions taken. Furthermore, the Applicant confirmed in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], that 7.2 Outline Code of Construction Practice** (Revision C) to be secured via DCO Requirement 4, establishes that responsibility for construction management, compliance and day-to-day control rests with the Applicant and its contractors, supported through approved management plans, monitoring and reporting mechanisms secured by the DCO Requirements. The Outline Code of Construction Practice requires monitoring data to be recorded and retained by the Applicant and its contractors as part of the		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				project's environmental management system. Where relevant, this information is to be made available to the local planning authority on request, rather than through routine reporting, enabling authorities to review compliance, investigate issues or follow up complaints as necessary. This approach provides transparency and oversight while maintaining applicant responsibility for monitoring and record-keeping enforcement, however, is a statutory function exercised independently by local authorities in the public interest and on a discretionary basis, and it is not appropriate for this to be funded by an applicant. **7.2 Outline Code of Construction Practice (Revision C)** does not assume that local authorities will undertake routine		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				monitoring on behalf of the Applicant, nor that they will absorb a significant resource burden associated with enforcement. Instead, it provides a proportionate framework intended to minimise the risk of non-compliance through applicant-led controls, with enforcement retained as a regulatory backstop consistent with established NSIP practice. The funding of a noise and vibration liaison officer is therefore not necessary or reasonable to secure through a Section 106 legal agreement and would fail the tests.		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Legacy enhancements	Thurrock – 6.14.25	Not specified	To secure a fund to provide legacy enhancements targeted at Green Grid links and wayfinding to connect South Ockendon, Tilbury and Chadwell St Mary to parks and riverside; small grants for community activation when routes reopen.	The Applicant considers a fund to provide legacy enhancements could be considered through community benefits. Community benefits are separate from and not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order. We are currently developing our approach to community benefits, and in spring 2026, we plan to begin consulting on how the community benefit funds should be used.	No	No legal agreement on this matter is being progressed for the reasons previously outlined.
Historic Environment						
Compensation	Tendring District Council – 12.20	Not specified	To secure a Tendring heritage compensation package comprising: • Targeted undergrounding	None of the policies on heritage in EN-1 and EN-5 expressly mention compensation. Furthermore, the National Planning Policy Framework (2025) does not make reference to a	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			of short spans at the worst-affected Ardleigh views (if re-route is not secured); and/or • A ring-fenced Historic Environment Fund for conservation projects in Tendring District (e.g., fabric repairs, setting enhancements, public realm in Ardleigh CA), heritage interpretation, and condition surveys, prioritised by TDC'	requirement for compensation for any harm to heritage assets. Targeted undergrounding of short spans at the worst-affected Ardleigh views is a design matter that would require a design change and could not be secured through a legal agreement as part of a wider compensation package. It is considered that a ring-fenced Historic Environment Fund for conservation projects in Tendring District would fail to meet the tests for a section 106 Agreement on the basis that such a financial package is not necessary to make the development acceptable in planning terms. The provision of an Historic Environment Fund for conservation projects in Tendring District would not reduce or remove harm and therefore does not materially		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				inform the planning balance. The provision of a compensation package which is not tied to a specific heritage asset would fail to meet a test on demonstrating that it is directly related to the Project.		
Compensation	Chelmsford City Council – 8.69, 9.27	Not specified	To secure heritage compensation to include repair of listed buildings and/or associated built and landscape features to offset harm to setting.	None of the policies on heritage in EN-1 and EN-5 expressly mention compensation. Furthermore, the National Planning Policy Framework (2025) does not make reference to a requirement for compensation for any harm to heritage assets. The provision of heritage compensation as described would not reduce or remove harm and therefore does not materially inform the planning balance. The provision of a general package which is not tied to a specific heritage asset would fail to meet the legal	No	No legal agreement on this matter is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				tests under regulation 122 of the Community Infrastructure Levy Regulations 2010 on demonstrating that it is directly related to the project. It is considered that the provision of heritage compensation repairs would fail to meet the tests for a section 106 Agreement.		
Cumulative effects						
Energy Infrastructure Plan	South Norfolk Council – 8.5.1	Not specified	Energy Infrastructure Plan to deliver: • a share understanding of the connection capacity • a coordination of construction periods • coordinated access tracks and construction compounds	As stated in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** page 158, the Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed	No	No legal agreement is being progressed for the reasons previously outlined. The Applicant has committed to joining the Developer's Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]**.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• locally shared ecological mitigation sites • local cumulative compensation and community mitigation fund	to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways matters. **7.3 Outline Construction Traffic Management Plan [Revision B]** further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of **3.1 Draft Development Consent Order [Revision C]**.		
Essex Developer Forum	Essex County Council – 4.4.31	Not specified	To secure funding to resource Essex County Council Developer Forum meetings	As stated in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** page 158, the Applicant has committed to joining and engaging in the	No	No legal agreement is being progressed for the reasons previously outlined. The Applicant has committed to joining the Developer's

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				Developer's Forum proposed by Essex County Council to help facilitate coordination. The Applicant has begun discussions with Essex County Council on the recovery of appropriate costs through a PPA		Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]**.
Resourcing officer time post consent	Essex County Council – 4.4.31, 4.5.109		To secure funding to resource Essex County Council officer time post consent	The Applicant has begun discussion with host authorities, including Essex County Council, regarding the potential use of PPAs to support the resourcing of officer time following the grant of development consent. Any such arrangements would be progressed separately from the Development Consent Order and would be subject to agreement between the Applicant and the relevant authority.	All host authorities	The Applicant is continuing to liaise with host Local Authorities on this matter.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Cumulative impact mitigation fund	Essex County Council – 4.4.60	Not specified	To secure funding for • PRoW enhancements • Local mental health support • Green infrastructure improvements	There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The Applicant considers that these matters fall outside the development consent process and are not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance[37].	No	No legal agreement is being progressed for the reasons previously outlined.

[37] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
Community Impact Mitigation	Tendring District Council – 12.16	Not specified	To secure a community impact mitigation or resilience fund	The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance[38].	No	No legal agreement is being progressed for the reasons previously outlined.
Project Coordinated	Tendring – 12.10	Not specified	To secure a legally binding project coordination framework (minimum between NF, FE and N2T) to require: • Shared construction timetables • Joint planning of peak-impact phases • Formal reporting to ECC Highways & TDC or any subsequent	Matters relating to binding coordination mechanisms between the Five Estuaries, North Falls and Norwich to Tilbury projects raised in **Tendring District Council Local Impact Report [REP1-182]**. The Applicant responded to these matters at Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, page 804. The below extract provides the position: '*The Applicant does not consider it appropriate or necessary to have a legally*	No	No legal agreement is being progressed for the reasons previously outlined.

[38] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			newly formed combined authority • A requirement for quarterly joint coordination boards chaired by ECC or TDC	*binding commitment that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables and shared mitigation strategies. These are separate schemes at different stages. The Applicant will, through existing measures in its own DCO documentation, ensure there is no conflict during construction activities. This will be developed further through continued co-operation/engagement*.'		
District Wide CTMP	Tendring District Council – 12.11	Not specified	To secure a single multi-project CTMP requiring: • Jointly agreed HGV routing • Restrictions on peak-time movements • Prohibition of simultaneous closures on key links	The Applicant responded, on page 741 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, to Tendring District Council's request for a single multi-project CTMP. The Applicant's response referred to its commitment to joining and engaging with the Developer's Forum to be set up by Essex County Council and other measures set out	No	The Applicant has committed to joining the Developer's Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• Shared traffic monitoring • Mitigation triggers (e.g., when HGV volumes exceed thresholds) • Coordination with Essex Police, emergency services, parish councils, freight operators and local bus providers	in **7.3 Outline Construction Traffic Management Plan [Revision B]**. The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding this matter.		
Shared use of infrastructure	Tendring District Council – 12.12	Not specified	To secure an agreement requiring: • Share haul roads • Coordinate temporary compounds • Co-use cable corridors where feasible	The Applicant does not consider it necessary or appropriate to secure a separate agreement requiring the measures listed with other schemes in Tendring District Council's area including North Falls and Five Estuaries, as these are separate schemes at different stages. However, the Applicant has committed	No	The Applicant has committed to joining the Developer's Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• Restore land jointly to avoid repeated disturbance	to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways matters. **7.3 Outline Construction Traffic Management Plan [Revision B]** further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of **3.1 Draft Development Consent Order [Revision C]**.		
Community Commun-ications	Tendring District Council – 12.13	Not specified	To secure a single coordinated communications plan across projects including:	The Applicant considers the approach for engagement with the community and stakeholders during construction as set out in commitment GG30 in the **7.2**	No	No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• One "front door" for construction queries so that affected communities are not send pillar to post to have their concerns heard • Integrated public notices with useful information and up to date contact numbers and details • Predictive and accurate information on upcoming traffic impacts allowing affected residents and businesses to plan ahead	**Outline Code of Construction Practice [REP2-014]** is precise, enforceable and reasonable in all other respects to be secured via DCO Requirement 4. The funding of a Tendring specific community liaison officer is therefore not necessary or reasonable to secure through a Section 106 legal agreement. It would also not be fairly related in scale or kind to fund a Tendring specific officer only.		

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			• A Tendring-specific community liaison officer empowered across all projects			
Monitoring and adaptive management	Tendring District Council – 12.15	Not specified	To secure a multi-project monitoring with: • Real-time data sharing • Joint incident response • Requirements to change construction methods or timings where cumulative harm emerges	In relation to cumulative impact management, we note the suggestion for a Tendring Construction Coordination Plan aligning programmes across Nationally Significant Infrastructure Projects (NSIPs). The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. The Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways	No	The Applicant has committed to joining the Developer's Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				matters. **7.3 Outline Construction Traffic Management Plan [Revision B]** further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of **3.1 Draft Development Consent Order [Revision C].** The Applicant considers that a separate, commitment relating to multi-project monitoring is not required.		
Coordination Board	Tendring District Council – 12.16	Not specified	To secure a Tendring NSIP coordination board with the power to require justified phasing	The Applicant does not consider it necessary or appropriate to establish a Tendring NSIP coordination board with powers to require justified phasing adjustments	No	The Applicant has committed to joining the Developer's Forum proposed by Essex County Council as detailed in Section 6.6 of **7.3 Outline Construction Traffic**

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
			adjustments and additional monitoring/ monitoring equipment to be installed.	and additional monitoring/monitoring equipment to be installed, as the Project will be delivered in accordance with the controls and approvals set out in the draft Development Consent Order (including the relevant requirements for construction management plans) and the Contractor will retain responsibility for construction methodology and programming. Notwithstanding this, the Applicant recognises the importance of coordination to minimise cumulative impacts and the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. **7.3 Outline Construction Traffic Management Plan [APP-309]** further notes that the Main Works Contractor will liaise with the relevant		**Management Plan [Revision D]**. No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. The Applicant does not consider that the need for additional monitoring/monitoring equipment. **7.2 Outline Code of Construction Practice [REP2-014]** includes mitigation and monitoring as part of the commitment's framework, the final scope of which will be agreed through the discharge of Requirement 4.		
Emergency Access Protocol	Tendring District Council – 12.16	Not specified	To secure a multi-project emergency access protocol to safeguard ambulance and fire coverage	The Applicant acknowledges the importance of safeguarding ambulance and fire coverage. However, the Applicant considers that a separate, bespoke multi-project emergency access protocol is neither necessary nor appropriate, as the matter can be addressed	Yes	No legal agreement is being progressed for the reasons previously outlined.

Topic Matter	Local Planning Authority - LIR Paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response at Deadline 4	Application to Any Other Local Planning Authorities?	Deadline 5 Update
				through existing proposed controls in **7.3 Outline Construction Traffic Management Plan [Revision B]** (see section 6.6 coordination with other developments/events) and secured through Requirement 4 of **3.1 Draft Development Consent Order [REP2-004]**.		
Cumulative Impact Management	Tendring District Council – 14.21	Not specified	To secure a Tendring Construction Coordination Plan aligning programmes across NSIPs (traffic windows, noisy works), with joint dashboards and cross-promoter escalation to protect community health and wellbeing	In relation to cumulative impact management, we note the suggestion for a Tendring Construction Coordination Plan aligning programmes across NSIPs. The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements.	No	No legal agreement is being progressed as this matter is addressed by the management plans to be secured by **3.1 Draft Development Consent Order [Revision E]** Requirement 4.

Table A.2 GEN 2.2 part b) Summary of ongoing agreements with Local Planning Authorities which are being progressed with expected timeframes for completion

Legal Agreement	Type of Agreement	Relevant Local Planning Authorities (LPAs)	Expected Timeframe for Completion
S85 of the Countryside and Rights of Way Act 2000 duty	Bilateral s106 agreement	Suffolk County Council (signatory)	Heads of Terms agreed. Unsigned draft agreement submitted at Deadline 5 in Appendix A of **8.25 National Landscape – DRAFT – Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [Revision A]** with signed agreement targeted to be submitted at Deadline 6.
Biodiversity Net Gain	Unilateral s106 agreement	South Norfolk DC Babergh and Mid Suffolk DC Tendring DC Colchester CC Chelmsford CC Brentwood BC Braintree BC Basildon DC Thurrock Council	Heads of Terms shared with all Local Planning Authorities on 12 August 2025. Detailed agreement shared with all Local Planning Authorities on 27 May 2026. Deadline for receipt of comments from Local Planning Authorities 12 May 2026. Targeted submission of signed agreement at Deadline 7.
3:1 tree planting and offsite delivery	Unilateral s106 agreement	All LPAs	Heads of Terms shared with all Local Planning Authorities on 12 August 2025. Detailed agreement currently being drafted to be shared with Local Planning Authorities shortly. Targeted submission of signed agreement at Deadline 7.
Police Resource	s106	Suffolk and Essex Police	The Applicant's legal representatives have arranged a meeting in June 2026 with legal representatives of Essex Police and Suffolk Constabulary to discuss a legal agreement. The Applicant aims to have a signed agreement in place by Deadline 7.

Legal Agreement	Type of Agreement	Relevant Local Planning Authorities (LPAs)	Expected Timeframe for Completion
Highway Authority Resource	PPAs	Host Local Highway Authorities and National Highways	The Applicant is continuing to liaise with host Local Highway Authorities and National Highways on this matter. The Applicant aims to have a signed PPA in place by Deadline 7.

Appendix B. Response to GEN 2.3

nationalgrid

Appendix B
GEN 2.3

Table B.1 Response to GEN 2.3

Question	Applicant's Response
GEN 2.3	a) In the absence of an industry standard methodology for the assessment of inter-project cumulative effects, the Applicant defined the term 'significant magnification' to allow the inter-project cumulative assessment to consider whether effects with other developments would be significantly greater / larger / magnified than those reported as a result of the Project in isolation. For example, where significant adverse effects are already reported as a result of the Project within the relevant environmental topic chapter in isolation, the use of 'significant magnification' considers where further significant effects are likely cumulatively. 'Significant magnification' has been applied using professional judgement and the assessments of other developments to determine the levels of cumulative effects. b) With the significance criteria in Table 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**, it would not be possible that localised effects could also be Major (significant). The significance criteria in Table 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** outlines that only potentially wide-ranging effects could result in a conclusion of Major and significant effect on receptors/resources. Localised effects would result in a Moderate effect, however, this is still a significant effect. This was developed to distinguish between wide-ranging and localised effects, however significant effects can still occur on both wide-ranging and localised effects. Professional judgement has been used to determine whether a predicted effect is deemed to be a significant magnification of effects already predicted to occur, which has included consideration of value and resilience of the receptor affected, as well as other factors such as duration of effect, extent of effect, type of effect, frequency of effect and likely success of mitigation. The sensitivity (informed by value and resilience / susceptibility) of receptors considered in the cumulative assessment is the same as identified in the individual environmental topic chapters. c) As stated in paragraph 17.5.18 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]:** 'The assessment involved describing and evaluating the likely significant inter-project cumulative effects arising from the Project and other developments using professional judgement and the significance criteria detailed in Table 17.6'. The criteria detailed in Table 17.6 are as follows: – A major (significant) effect is described as an adverse or beneficial effect that is a significant magnification of potentially wide-ranging effects on a receptor/resource that is already predicted to occur

- A moderate (significant) effect is described as adverse or beneficial effects that are a significant magnification of localised effects on receptors or resources that are already predicted to occur
- A minor (not significant) effect is described as an adverse or beneficial effect that would only lead to a localised and not significant magnification of effects on a receptor or resource
- Negligible effects.

Residual effects were taken from the assessments in the environmental topic chapters of the Environmental Statement (ES) to inform the assessment of significance of inter-project cumulative effects with other developments using professional judgement to determine whether effects with other development would be significantly greater / larger / magnified than those reported as a result of the Project in isolation.

The assessment of inter-project cumulative effects was undertaken by the same competent experts that undertook the assessments in the environmental topic chapters in the ES.

d) The Applicant has provided a table to outline examples of similarities and differences between the approach to the inter-project cumulative effects assessment the Project has taken, and the approaches taken by other linear Nationally Significant Infrastructure Projects (NSIPs), because, as stated above, there is no industry standard methodology for the assessment of inter-project cumulative effects.

	Similarities (marked with ✓) and differences (explained in text) between approaches to the cumulative effects assessment					
Project	*Use of staged approach to inter-project cumulative effects assessment as outlined in Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025)*	*Zones of Influence (ZOI) used to establish the long list of other developments*	*'Major Development' considered in the long list as defined under the Town and Country Planning (Development Management Procedure) (England) Order 2015, excluding minor developments*	*Significance Criteria*	*Assumptions - Where publicly available information is not available, professional judgement has been applied to identify the potential for significant cumulative effects where possible. In absence of information, a realistic worst case scenario is assessed.*	*Further Stage 4 assessment of 'clusters' of two or more other development with the Project*

Norwich to Tilbury	✓	Different ZOIs are used by each project based on the Study Areas used in each of the environmental topic chapters in the ES, which vary due to the nature, scale and locations of the projects as well as the sensitivities of environmental receptors, in order to undertake a proportionate approach.	✓	Please see response to GEN 2.3 (c) above. A major (significant) effect is described as an adverse or beneficial effect, that is a significant magnification of potentially wide-ranging effects on a receptor/resource that is already predicted to occur. A moderate (significant) effect is described as adverse or beneficial effects that are a significant magnification of localised effects on receptors or resources that are already predicted to occur. A minor (not significant) effect is described as an adverse or beneficial effect that would only lead to a localised and not significant magnification of effects on a receptor or resource.	✓	✓
Yorkshire GREEN	✓		✓	No cumulative effects specific significance criteria are used. The significance criteria used to identify likely significant effects are consistent with the criteria used for individual	✓	✓

				environmental aspect chapters.		
Bramford to Twinstead Reinforcement	✓		✓	Professional judgement has been applied. No significance criteria are provided in the methodology.	✓	✓
Sea Link	✓		✓	Professional judgement has been applied in determining whether the combination of effects from two developments could result in a significant effect overall. An indicative matrix is provided demonstrating how the significance of effects for each development is combined to provide the likely significance of cumulative effect (e.g., if developments 1 and 2 both report a Major significant effect, then the cumulative effect is likely to be Major and significant).	✓	✓

The number and scale of other nearby projects that have been or are yet to be constructed at sites such as the proposed East Anglia Connection Node (EACN) and Tilbury North Substations are similar to those of other linear projects. Other areas of England have larger numbers of other nearby projects, such as Yorkshire and Lincolnshire, in the Humber region, where a number of large scale developments are under construction, or yet to be constructed. These include linear pipeline NSIPs such as the Humber Carbon Capture Pipeline, Thorpe Marsh Gas Pipeline and Project Union: East Coast 420 km hydrogen gas pipeline, alongside electricity transmission infrastructure, energy parks, solar farms, power stations, residential developments and infrastructure associated with estuary ports.

e) The following table summarises good practice guidance the Applicant has applied in determining cumulative effects for each environmental topic assessed. However, as previously stated there is no industry standard approach to undertaking cumulative assessments. This table has been derived from the guidance listed in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** paragraph 17.2.14.

Good Practice Guidance	How good practice guidance has been applied in determining cumulative effects
The IEMA Special Report – The State of Environmental Impact Assessment Practice in the UK (IEMA, 2011)	The cumulative effects assessment for all topics assessed has considered the guidance set out in the IEMA Special Report – The State of Environmental Impact Assessment Practice in the UK. This included defining impacts (both intra-project and inter-project cumulative effects) the Project should assess.
The Institute of Environmental Management and Assessment (IEMA) Demystifying Cumulative Effects, Thought Pieces from UK Practice. Impact Assessment Outlook Journal, Volume 7: July 2020.	The cumulative effects assessment has considered the guidance set out in the IEMA Demystifying Cumulative Effects, Thought Pieces from UK Practice. Impact Assessment Outlook Journal when undertaking the cumulative effects assessment. This included the approach to use professional judgement in absence of standardised methodology when determining significance of a cumulative effect. It also advises avoiding speculation on the potential impacts of 'other developments' where there is limited or no information available, and that limitations and uncertainties within the assessment should be documented for transparency.
Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025). The Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025) provides the following four stages to cumulative effects assessment: • Stage 1: Establishing the 'Long List' of 'other existing developments and, or approved developments'. • Stage 2: Establishing a 'Short List' of 'other existing developments and, or approved developments'. • Stage 3: Information gathering. • Stage 4: Assessment	The methodology of the inter-project cumulative effects (used to assess all topics) is structured using the staged assessment approach detailed in the Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025). The cumulative effects assessment for each environmental topic is provided in a template that follows a similar level of detail and structure provided in the templates at Annex 1 and Annex 2 of the advice note. The criteria that inform the likely significance of cumulative effects (duration of effect, extent of effect, type of effect, frequency of effect, value and resilience of the receptor affected, and likely success of mitigation) have been derived from guidance and methodology specific to each environmental topic as detailed in individual environmental topic chapters of the ES,

Question	Applicant's Response
The Planning Inspectorate Advice Note on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025) states that the criteria for determining significance of effects should consider capacity of the receiving environment and receptors to accommodate changes likely to occur. This includes consideration of duration of effect, extent of effect, type of effect, frequency of effect, value and resilience of the receptor affected, and likely success of mitigation.	as well as the professional judgement of environmental topic subject matter experts.
In addition to guidance, the cumulative effects assessment has been undertaken in accordance with relevant policy which is listed in the rows that follow.	
Overarching National Policy Statement (NPS) for Energy (EN-1): • Paragraph 4.1.5 in EN-1 states: '*In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: … its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'. • Paragraph 4.2.12 in EN-1 states: *'The cumulative impacts of multiple developments with residual impacts should also be considered.'* • Paragraph 4.3.3 in EN-1 states: *'The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects'.* • Paragraph 4.3.19 of EN-1 states: *'The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place'*. • Paragraph 4.4.5 in EN-1 states: '*The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate'.*	All environmental topics have complied with NPS EN-1 when undertaking the cumulative effects assessment.

Question	Applicant's Response
NPS for Electricity Networks Infrastructure (EN-5): • Paragraph 2.13.20 in EN-5 states: '*Applicants should refer to policy text in … EN1 (including sections 4.4 and 5.4) regarding consideration of impacts and cumulative impacts in the environment, as well as policy text in the remainder of this policy statement regarding consideration of impacts onshore*'.	All environmental topics have complied with NPS EN-5 when undertaking the cumulative effects assessment.

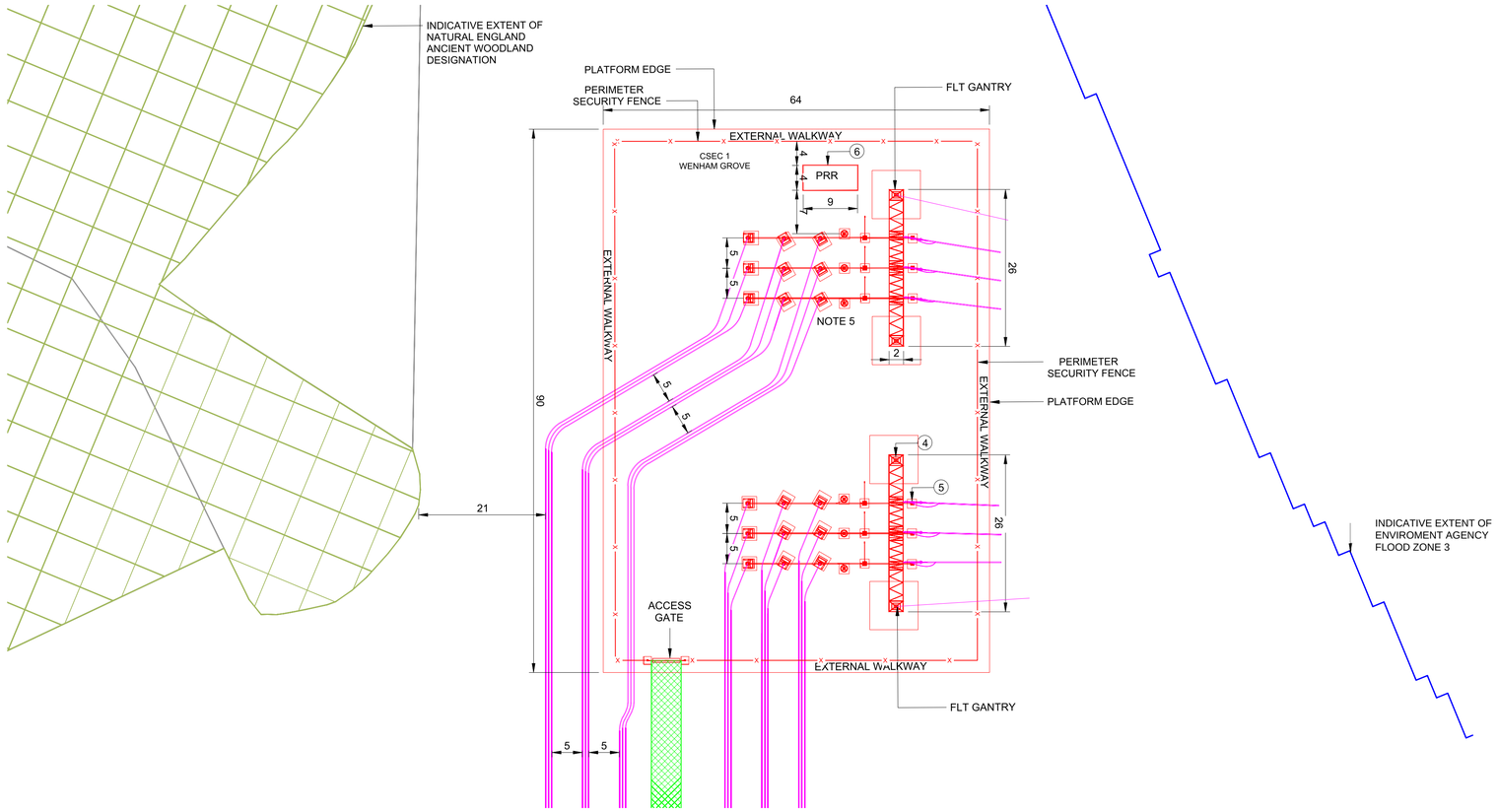
Appendix C.
BIO 2.11

Appendix C
BIO 2.11

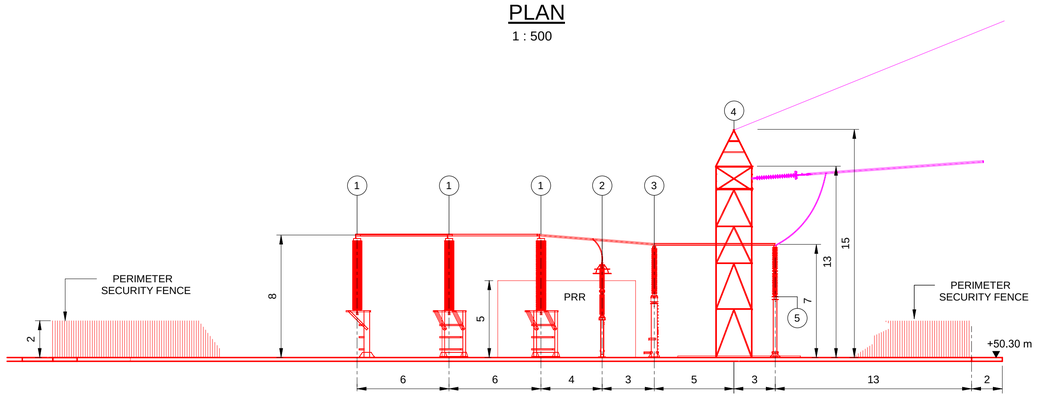
Application Document 8.9.2

THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
DESIGN AND LAYOUT PLANS
INDICATIVE CABLE SEALING END COMPOUND LAYOUT & ELEVATIONS WENHAM GROVE

BIO 2.11 - APPENDIX



PLAN
1 : 500



ELEVATION 1
1 : 200

LEGEND

- Proposed equipment
- Proposed overhead line/cable works
- CSE Compound permanent access

LIST OF ABBREVIATIONS

01 - 400kV Cable sealing end

02 - 400kV Surge arrester

03 - 400kV Earth switch

04 - Full line tension (FLT) gantry

05 - 400kV Post insulator

06 - Portable relay room (PRR)

Notes

1. These plans are indicative and will sit within the Order Limits. Due to the need for future flexibility, National Grid will be applying for Order Limits and Limits of Deviation within its DCO, within which any final alignment would lie.
2. All dimensions are approximate and indicated in meter(m) unless noted otherwise.
3. This drawing is scaled at paper size A1, therefore any prints taken at smaller sizes will affect accuracy of the measurement units and should not be scaled against.
4. The voltage of the overhead line shown is 400kV.
5. The Natural England Ancient Woodland designation and the Environment Agency Flood Zone 3 are indicatively depicted.

0 2 4 6 8 10
METRES 1:200

0 5 10 15 20 25
METRES 1:500

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Issue	Date	Remarks	Drawn	Checked	Approved
A	JUN-2026	For deadline five	SN	GR	KR

Title

THE NATIONAL GRID
(NORWICH TO TILBURY) ORDER
DESIGN AND LAYOUT PLANS
INDICATIVE CABLE SEALING END COMPOUND
LAYOUT & ELEVATIONS WENHAM GROVE

BIO 2.11 - APPENDIX

nationalgrid

PINS Application Number
EN020027

National Grid Drawing Reference
AENC-MMAC-ENG-DWG-0085-13A

Scale	Sheet Size	Sheet	Issue
As shown	A1	SHEET 1 OF 1	A

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Appendix D.
DCO 2.G1

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Appendix D
DCO 2.G1

i. Outline Code of Construction Practice, Outline Landscape and Ecological Management Plan, and Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation

Note: this table builds on the response provided to SET 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, where the Applicant removed the term 'where practicable' (or similar) from a number of commitments. Those commitments from which 'where practicable' was removed, are not included in the table below. Text in blue is provided in response to ExA Written Question DCO 2.G1.

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
7.2 Code of Construction Practice [REP2-014]		
GG07	Land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition discussed with the landowner), in line with the Outline LEMP (document refence 7.4). Hedgerows, fences, and walls (including associated earthworks and boundary features) will be reinstated to a similar variety to those that were removed, in discussion with the landowner and to the satisfaction of National Grid.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used on this general commitment as it covers a lot of possible outcomes, including agricultural land, field access points, farm tracks, farmyards, etc. It may not be practicable to return some of these tracks and access points to a pre-construction condition.'* ***The assessment within the Environmental Statement assumes that land used temporarily would be reinstated to its pre-construction condition and use. The Main Works Contractor(s) would need to be able to demonstrate where this is not practicable. It would not result in any materially new or different effects to those assessed within the ES.***
GG08	Where features are to be retained, where practicable, (including veteran trees, ancient woodland, high, medium and low value trees, hedgerows, watercourses and archaeological/ heritage assets), an appropriate protective	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary.	*'The use of 'where practicable' is used in this instance as it will not be possible to maintain all features as a result of construction and operation (and maintenance) of the Project.'* ***The assessment within the Environmental Statement assumes that appropriate protective areas or mechanisms will be implemented. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
GG21	Fuels, oils, and chemicals will be stored responsibly, away from sensitive water receptors (and trees). Where practicable, they will be stored over 15 m from watercourses, ponds, and groundwater dependent terrestrial ecosystems. Where it is not practicable to maintain a distance greater than 15 m, additional measures will be identified. All refuelling, oiling, and greasing of construction plant and equipment will take place above drip trays, over 15 m away from any watercourse, and also away from drains as far as is reasonably practicable. Vehicles and plant will not be left unattended during refuelling. Appropriate spill kits will be made readily accessible for these activities and a maintenance and inspection regime will be in place to ensure spill kits are maintained with appropriate stock. Potentially hazardous materials used during construction will be safely and securely stored including use of secondary containment where appropriate. Stored flammable liquids will be protected either by double walled tanks or stored in a bunded area with a capacity of 110% of the maximum stored volume. Spill kits will be located nearby.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' allows for flexibility during construction for the Main Works Contractor(s). Where fuels, oils, and chemicals cannot be stored more than 15 m from watercourses, ponds, and groundwater dependent terrestrial ecosystems (for example, due to topography, land use, access, etc) additional mitigation will be identified by the Main Works Contractor(s) to avoid impacts.'* ***The assessment within the Environmental Statement assumes that fuels, oils and chemicals would be stored over 15 m from watercourses, ponds, and groundwater dependent terrestrial ecosystems. Where it is not practicable, further mitigation will be identified by the Main Works Contractor(s) as stated in the commitment. Therefore the Applicant can confirm that a worst-case scenario is assessed within the ES.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
AS02	Land required temporarily for construction will be returned to its former agricultural use / condition or a use / condition as discussed with the landowner, where practicable. Any agreements to restore land to a condition as discussed with the landowner will be fully recorded.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used on this general commitment as it covers a lot of possible outcomes, including agricultural land, field access points, farm tracks, farmyards, etc. It may not be practicable to return some of these to a pre-construction condition. In addition, the landowner may ask for land to be reinstated to something that is unreasonable.'* ***Assessment within the Environmental Statement assumes that land used temporarily would be reinstated to its pre-construction condition and use. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
AS03	Where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction period or as agreed through the landowner discussions. This may require signed diversions or temporary restrictions to access. The means of access to affected properties, facilities and land parcels will be communicated to affected parties at the start of the Project / at the start of the relevant sections, with any changes communicated in advance of the change being implemented. Where field-to-field access points require alteration because of construction, alternative field access will be provided in consultation with the landowner/occupier.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'This use of 'where practicable' should be retained as the key aspect is Health and Safety (H&S). Access cannot be retained if it would lead to a H&S risk and therefore the use of 'where practicable' should be retained. The commitment requires signage, communication and alternatives to be provided; in other words, there is a commitment to do the best possible within the constraints posed by H&S requirements.'* ***Assessment within the Environmental Statement assumes that access would be maintained where safe to do so. Where it is not practicable or safe to maintain accesses, alternatives will be provided in discussion with the***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		landowner. Therefore the Applicant can confirm that a worst-case scenario is assessed within the ES.
AS04	Existing water supplies for livestock that have been notified to the Project by the landowner before construction commences will be maintained or alternatives put in place in advance of any disturbance. Where supplies will be lost or access compromised by construction works, temporary alternative supplies will be provided where necessary. Water supplies will be reinstated following construction, where practicable.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'This use of 'where practicable' provides an allowance to not reinstate should there be some overriding engineering / logistical reason. For example, if to reinstate to a field would require a significant length of pipework on third-party land this might be deemed not practicable/not securable – in any such instances the mechanism for compensation would kick in.'* ***Assessment within the Environmental Statement assumes that existing water supplies would be maintained or a temporary alternative would be supplied, with supplies being reinstated following construction. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
B07	Construction Exclusion Zones (CEZ) will be established prior to construction to define working areas and ensure protection of retained habitats throughout the Project. A minimum buffer of 10 m (where practicable) will be retained around priority habitats (including watercourses) to reduce any potential direct or indirect effects on the habitats and species associated with them and the CEZ may need to be extended beyond 10 m for certain biodiversity receptors, such as woodlands and trees for example, to protect root protection zones.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to allow for some flexibility for the Main Works Contractor(s).'* ***Assessment within the Environmental Statement assumes that construction exclusion zones would be implemented to protect retained habitats. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
B11	Method statements will be developed to ensure that any culverts installed within watercourses include suitable measures to allow the passage of animals (i.e., otters, water vole and fish and eels) throughout construction, accounting for fluctuating water levels. For otter and water vole this may comprise an adjacent dry pipe. Where appropriate, in channel works will be supported using a cofferdam and overpumping, and for certain watercourses this will require fish rescue to be carried out under licence from the Environment Agency. This will entail using stop nets or equivalent to enclose the area of work and electric fishing the area a minimum of three times. Rescued fish will then be released a suitable distance downstream. All temporary overpumping works will use 2 mm screens to prevent eel entrainment in accordance with the Eel (England and Wales) Regulations 2009. The duration of construction activities within watercourses will be kept to a minimum to minimise effects. In-channel works will avoid fish spawning seasons where practicable.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to allow for flexibility for the Main Works Contractor(s). Every effort will be undertaken to time in-channel works to avoid the fish spawning season where practicable. However, due to the scale of the Project, the number of watercourses and the overall constraints to the construction programme, this may not always be practicable.'* ***Assessment within the Environmental Statement assumes that in-channel works will avoid fish spawning season. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
GH09	Restrictions will be applied for any work within Groundwater Source Protection Zones (SPZs) 1 and 2 and discussed with the Environment Agency. Restrictions may include: • Construction vehicle parking, fuel storage, de-icer storage, rock salt storage, and washout/ cleaning of ready-mix concrete vehicles and equipment will be sited outside SPZ1 and where practicable outside SPZ2 designations • Application of salt grit (for example, to prevent access tracks freezing) to comply with recommended rates in	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to allow for flexibility for the Main Works Contractor(s) to avoid restrictions during construction.'* ***Assessment within the Environmental Statement assumes that construction vehicle parking, fuel storage, de-icer storage and washout/cleaning of ready-mix concrete vehicles would be sited outside of SPZ2. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	CIRIA 648 (2006) with control of runoff during any application in SPZs,	***materially new or different effects to those assessed within the ES.***
H06	Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impact to each Protected Lane (Essex) and Historic Land (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected/Historic Lane, including associated banks and ditches. During construction, the Main Works Contractor(s) will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, replacement (compensatory design elements) will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance as it will not be possible to maintain all elements of the landscape as a result of construction and operation (and maintenance) of the Project.'* ***As 'where practicable' is used in this commitment it was not considered as mitigation when determining the residual effects within the Environmental Statement. Therefore, if it is practicable to implement this commitment it would reduce any residual effects reported within the ES further. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
LV04	Where practicable, retain elements within the landscape such as trees, hedgerows, walls and fences. Where elements cannot be retained, replacement will be used as appropriate (including reinstating fences, and walls and replanting trees and hedgerows where practicable).	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance as it will not be possible to maintain all elements of the landscape as a result of construction and operation (and maintenance) of the Project.'* ***This commitment was not considered as mitigation when determining the residual effects within the Environmental***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		Statement. Therefore, if it is practicable to implement this commitment, it would further reduce any residual effects reported within the ES. Therefore the Applicant can confirm that a worst-case scenario is assessed within the ES.
NV11	Continuous noisy plant will be housed in acoustic enclosures, where practicable and efficacious.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance as the detailed design has not occurred and therefore specific plant has not been identified.'* ***Assessment within the Environmental Statement assumes that continuous noisy plant is not housed in acoustic enclosures. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES. Therefore, if it is practicable to implement this commitment, it would further reduce any residual effects reported within the ES.***
NV16	Equipment will be well maintained and where practicable will be used in the mode of operation that minimises noise.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance as the detailed design has not occurred and therefore specific plant has not been identified.'* ***Assessment within the Environmental Statement assumes that plant operates in its standard operating mode. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES. Therefore, if it is practicable to implement this commitment, it would further reduce any residual effects reported within the ES.***
S02	PRoWs crossing the working areas will be managed in discussion with the relevant Local Planning Authorities and potential temporary closures and diversions applied, where required. Road closures and diversions will be kept	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance to allow for flexibility for the Main Works*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	as brief as possible, with alternative routes maintained where practicable. Access disruption would be reduced while construction activities occur where practicable. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. Management of PRoW during construction is detailed in the Outline PRoW Management Plan (document reference 7.6).	*Contractor(s) as maintaining alternative access routes may not be possible at all times during construction.'* ***Assessment within the Environmental Statement assumes that road closures and diversions will be kept as brief as possible, with alternative routes maintained. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
S03	Where community facilities, businesses, tourism, and recreational assets cannot be avoided and fall within the Order Limits, access to these affected assets will be maintained where practicable. In the case of closures, appropriate access arrangements, including temporary diversion will be provided. Advance notice signage will be erected regarding route diversion. These notice boards will be erected prior to and throughout the construction period.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used in this instance to allow for flexibility for the Main Works Contractor(s) as maintaining access to affected assets may not be possible at all times during construction.'* ***Assessment within the Environmental Statement assumes that access would be maintained where safe to do so. Where it is not practicable or safe to maintain accesses, alternatives will be provided in discussion with the landowner. Therefore the Applicant can confirm that a worst-case scenario is assessed within the ES.***
7.4 Outline Landscape and Ecological Management Plan [REP2-018]		
2.2.7	The final landscape planting schedule will take into account timings relevant to the EIA where practicable and other seasonal restrictions set out within the Environmental Statement or relevant European Protected Species (EPS) licence.	***The phrase 'where practicable' has been removed from this sentence in the iteration of this document submitted at Deadline 5.***
Table 5.4 (River Gipping)	Habitats would be reinstated in line with the habitat reinstatement principles within Chapter 9 of this report.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First**

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	Replacement tree planting would be undertaken outside of the electrical clearance distances but within the CWS or adjacent Order Limits where practicable. Hydrological protection measures would be followed as set out within the Outline CoCP (document reference 7.2) (Revision C).	**Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that tree planting will take place in locations where this is possible taking account of the constraints identified in this sentence.'* ***Where it is not practicable to undertake replacement tree planting within the CWS or adjacent Order Limits, the principles for replacement planting as set out in Section 9.3 of this document will be followed. A worst-case scenario has been assessed.***
6.1.8	Should an impacted tree be found to support a feature with hibernation potential, felling should be undertaken outside of the hibernation window (November to end February inclusive) where practicable. Where the hibernation window is unavoidable a single inspection under the supervision of a bat licenced ecologist, immediately prior to being impacted, will be undertaken to determine the presence/absence of hibernating bats within the tree. Should the feature be able to be fully inspected and no hibernating bats identified, the feature can be felled / pruned immediately or can be blocked and felled at a later date. If the feature cannot be fully inspected due to the extent/type of hibernation feature present, felling of the tree will need to be delayed until after the hibernation window (March to end October). Should a hibernation bat roost be confirmed, works will need to stop, a 20 m exclusion buffer applied and a Natural England bat licence obtained.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used where trees with hibernation potential for bats will not be felled in the hibernation period. The rest of the paragraph explains what will happen if this is not possible.'* ***Where the hibernation window is unavoidable, further mitigation is in place which is considered in the assessment of residual effects. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
6.1.9	Where the presence of a bat roost is confirmed during surveys/inspections, every effort will be made through micro-siting to retain the tree and associated bat roost, where practicable. Where unavoidable, any direct loss of a known bat tree roost will be carried out under a Natural England licence. A 20 m exclusion buffer will be demarcated at any known bat roosts when works are occurring nearby, to ensure no accidental encroachment of construction activities that may cause a disturbance impact. If temporary construction lighting is required during certain periods of the year, the Project will seek to avoid directly lighting potential bat roosting features to avoid disturbance (month and roost-type dependent).	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, trees with bat roosts are to be retained through careful routeing. The rest of the paragraph explains what will happen if this is not possible.'* ***Where avoidance of bat roost trees is unavoidable, further mitigation is in place which is considered in the assessment of residual effects. Therefore the Applicant can confirm that a worst-case scenario is assessed within the ES.***
6.1.12	Replacement planting of all bat foraging and commuting routes on completion of works irrespective of bat usage will be undertaken in line with Chapter 9 of this report. This will include replacement tree planting where practicable, outside of the clearance distance for overhead lines and underground cables, but as a minimum native hedgerow and scrub planting to restore linear features acting as bat foraging and commuting routes.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, trees will be included in replacement planting taking account of the constraints identified in this sentence.'* ***Where it is not practicable to undertake replacement tree planting due to electrical clearance, the habitat connectivity would be maintained using a combination of hedgerow, small tree and shrub planting with no negative effect on foraging or commuting bats. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
7.4.1	Where roots are encountered in an existing road RPA, as described in clause 6.2.3.1 of BS 5837:2012, the existing road pavement will be left in place to provide the ground protection, where practicable. The Project Arboriculturist / ArbCoW will confirm that the existing road pavement is	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, existing road pavement*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	suitable to provide appropriate ground protection to tree roots or will advise on alternative methods if retaining the pavement is not practicable.	*is to be retained. The rest of the paragraph explains what would happen if this was not possible.'* ***Where the existing road pavement is not considered suitable, further mitigation is in place which is considered in the assessment of residual effects. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
7.4.2, second bullet	Hand excavation: This involves hand digging the soil around tree roots using a spade or other suitable non-mechanised tools. The soil would typically be stored so that it is available for reuse after works are completed. Hand digging would be used to allow placement of Project components around or between roots without impacting them where practicable, or in worst case it is to allow clean severance of roots with sharp saw or secateurs.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, impacts to tree roots are to be avoided and the rest of the sentence explains what would happen if this was not possible.'* ***Where it is not possible to avoid impacting tree roots, the mitigation measures proposed would ensure no lasting effects on trees. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
7.5.1	The Project has considered the Forestry Commission and Natural England Standing Advice (2022) which states that 'For ancient woodlands, you should have a buffer zone of at least 15 m to avoid root damage…'. This 15 m buffer has been accommodated where practicable.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, a 15 m buffer has been accommodated. The paragraphs below reference the appendix that outlines the specific mitigation applied to each ancient woodland.'* ***Where it is not possible to avoid works within the 15 m woodland buffer, the mitigation measures identified in 7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032] would minimise impacts. These mitigation measures were taken account of in the assessment of***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		impacts. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.
7.6.3	A 5 m root protection zone buffer where practicable, should be applied to retained hedgerows, to ensure no damage to the hedgerows root system. This may include use of suitable fencing to protect the hedgerow from accidental encroachment.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, a 5 m buffer is to be applied to the hedgerows. Note: it is not possible to retain this buffer where there is a direct impact, i.e. the hedgerow is to be crossed.'* ***The mitigation measures required to protect retained hedgerows are identified in the text, with hedgerow removal quantified in the impact assessment where retention would not be possible. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
7.7.1	A 10 m protection buffer from the top of the bank from all retained watercourses will be applied where practicable and clearly demarcated to avoid accidental encroachment. Measures relating to pollution prevention are set out in the Outline CoCP (document reference 7.2) (Revision C).	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, a 10 m buffer is to be applied to the watercourses. Note: it is not possible to retain this buffer where there is a direct impact, i.e. the watercourse is to be crossed.'* ***The mitigation measures required to protect water quality are provided in the Outline CoCP as referenced. These are standard pollution control measures. The impact assessment has assessed the potential impact in the absence of these mitigation measures with residual effects based on the assumption that they would be successfully implemented to protect water quality.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
8.1.2	Vegetation with the potential to support breeding birds will be removed outside of the breeding bird season (March to August inclusive) where practicable. If vegetation clearance is required within the breeding bird season, an experienced ECoW will conduct a nesting bird check prior to any vegetation removal. In the event that an active nest is found, appropriate protection measures will be put in place. This will include exclusion zones around active nests until chicks fledge or nests become inactive. The size of the exclusion buffer will be determined on a 'case-by-case' basis by the ECoW. There will be a minimum buffer distance of 5 m which will likely be increased in many cases, such as for ground nesting birds or Schedule 1 species.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, vegetation clearance will be scheduled to avoid the bird nesting season. The rest of the paragraph identifies what will happen if this is not possible.'* ***Where it is not possible to undertake vegetation clearance outside the breeding bird season, mitigation measures have been identified in the Outline LEMP to ensure legislative compliance. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
8.1.5	Tree removal will be kept to a minimum within these habitats and disturbance to the ground will be avoided where practicable or reduced from standard working practices. The type of ground protection will be selected, either matting, timber, metal, rubberised or similar, dependent on the ground conditions and the machinery/plant being used. Specific commitments have been made in some locations, as detailed in the Outline CoCP (document reference 7.2) (Revision CB) for works in proximity to woodlands.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, ground works close to trees are to be avoided. The rest of the paragraph identifies the measures to be employed where this is not possible.'* ***The mitigation measures identified in the Outline LEMP would safeguard retained trees. The Main Works Contractor(s) would need to be able to demonstrate that where this is not practicable, it would not result in any materially new or different effects to those assessed within the ES.***
8.2.2	Tree removal will be required to facilitate construction of the Project. Micro-siting of the haul road will seek avoid mature trees where practicable within the restrictions of the LoD.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, trees are to be retained. The rest of this section explains how impacts have been*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		assessed and the routeing decisions that have been taken to avoid impacts to woodlands and trees.' ***This commitment was not considered as mitigation when determining the residual effects within the Environmental Statement. Therefore, if it is practicable to implement this commitment, it would further reduce any residual effects reported within the ES. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
8.3.2	Temporary loss of hedgerow will be required to facilitate the construction of the Project. Micro-siting of the haul road should continue to seek using existing gaps in the hedgerow where practicable. A Project commitment has been made that at hedgerows the works areas will be pinched and typically a 12 m swathe of removed vegetation (including drainage) would be temporarily removed to allow for the construction and operational use of the haul road.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, existing gaps in hedgerows will be used when micro siting the haul roads.'* ***This commitment was not considered as mitigation when determining the residual effects within the Environmental Statement. Therefore, if it is practicable to implement this commitment, it would further reduce any residual effects reported within the ES. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
9.1.2	As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. The only exception to this will be restrictions on tree planting below the overhead line and directly on top of the underground cables. Species mixes will allow for low growing and shallow rooted tree/scrub species as an alternative in these locations.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitats are to be restored to their pre-construction condition and land use. The rest of the paragraph identifies the situation where this may not be possible.'* ***The mitigation measures identified in the Outline LEMP would reduce negative effects on habitats. The impact assessment identifies where habitat would be temporarily***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		or permanently lost and takes account of where it would not be possible to provide replacement tree planting and instead replace woodland or trees with scrub. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.
9.3.1, first bullet	Where practicable, trees will be replanted in the same, or close to the location from which they were removed. Exceptions to this include areas where tree planting would be unsuitable for example, areas within overhead line buffer zones (56 m), areas located above underground cables, or areas with existing constraints which preclude tree planting. In these cases, tree planting will be undertaken as close as possible to the original location and still within the Order Limits	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, trees are to be planted in their pre-construction location. The rest of the paragraph identifies the situation where this may not be possible and the steps that would be taken.'* ***The mitigation measures identified in the Outline LEMP would ensure that replacement trees would be provided where possible. The post-development habitat replacement and creation take account of the restrictions placed by the Project on tree planting. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
9.3.1, third bullet	Where practicable, removed woodland and trees will be replaced on-site with the same species or another locally appropriate species. Consideration will be made to ecological enhancement of these areas, with a more diverse mix of native species planting. These trees will be sourced from British provenance stock to minimise the spread of pests and diseases	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, woodland and trees are to be planted in their pre-construction location. The first bullet identifies the situation where this may not be possible and the steps that would be taken.'* ***The mitigation measures identified in the Outline LEMP would ensure that replacement trees are appropriately sourced and that suitable species are used where stock is not available. Therefore, the Applicant can confirm that this is the scenario that was used within the ES.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
9.3.3, second bullet	Where practicable, trees will be replanted in the same, or in close proximity to, the location from which they were removed	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, trees will be replanted in the same, or close to, the location from which they were removed. The third, fourth and fifth bullet in this paragraph identify what would occur if this was not possible.'* ***The mitigation measures identified in the Outline LEMP would ensure that replacement trees would be provided where possible. The post-development habitat replacement and creation take account of the restrictions placed by the Project on tree planting. Therefore, the Applicant can confirm that a worst-case scenario is assessed within the ES.***
9.7.10, first bullet	Retention and enhancement of existing vegetation where practicable, including retention and protection of mature shelterbelts in the east of the Order Limits and mature trees along Grange Road, and enhancement through supplementary tree and shrub planting	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape. Therefore, the Applicant can confirm that this is the scenario that was used within the ES.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
9.7.13, first bullet	Retention of existing vegetation where practicable, including retention and protection of ancient woodland	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, ancient woodland has been retained, because although the Project does not remove ancient woodland in this location, ancient woodland is to be removed by Lower Thames Crossing.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape. As identified above, the Project would not affect ancient woodland in this area, but woodland would be removed by the Lower Thames Crossing. Therefore, the Applicant can confirm that a worst-case scenario was used within the ES, i.e., that Lower Thames Crossing would go ahead as planned.***
9.7.18, first bullet	Retention and enhancement of existing vegetation where practicable, including retention and protection of woodland at Wenham Grove and south of the former railway line, and enhancement through supplementary tree and shrub planting	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		Wenham Grove would be retained within this area. Therefore, the Applicant can confirm that this is the scenario that was used within the ES.
9.7.21, first bullet	Retention and enhancement of existing vegetation where practicable, including retention and protection of the Horkesley Plantation south-west of the CSE compound, and enhancement through supplementary tree and shrub planting	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape. Horkesley Plantation would be retained with this area. Therefore, the Applicant can confirm that this is the scenario that was used within the ES.***
9.7.24, first bullet	Retention and enhancement of existing vegetation where practicable, including woodland along the watercourses to the north and west of the CSE compound and enhancement through supplementary tree and shrub planting	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		Therefore, the Applicant can confirm that this is the scenario that was used within the ES.
9.7.27, first bullet	Retention and enhancement of existing vegetation where practicable, including field boundary hedgerows and mature hedgerow trees and a small block of woodland to the south, and enhancement through supplementary tree and shrub planting	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.'* ***The planting plans for the Environmental Areas have taken account of the existing ground conditions, the existing vegetation and the built development layout. The design provides mitigation for landscape and visual impacts, is integrated into the landscape and delivers habitats of value to biodiversity that are connected to the wider landscape. Therefore, the Applicant can confirm that this is the scenario that was used within the ES.***
7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]		
Table 2.1 (1.5 Control of plant movement)	Where practicable the aim is for control measures (such as fencing, signage) for plant movement to avoid damage to buried archaeological remains through compression or rutting.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here is to allow for flexibility where the placement of physical control measures may not be possible due to space, environmental or safety constraints or where physical control measures may not be the most appropriate measure to avoid damage to buried archaeological remains.'* ***This is one of a suite of measures that could be used to ensure preservation in situ. The assessment conclusions do not assume preservation in situ through this measure and therefore the use of 'where practicable' does not change the conclusions of assessment.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
4.4.1, fourth bullet	Earthworks for construction of permanent site access and platform (including forming temporary soil bunds for storing excavated material). Where practicable, the temporary and permanent access would be combined	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here has been utilised in acknowledgement that it may not always be possible to combine temporary and permanent access points, but this will be done when it is possible.'* ***This text describes the proposed works. The assessment is based on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134], with sensitivity testing for the LoD. Therefore, the use of 'where practicable' would not alter assessment conclusions and mitigation would be undertaken, as appropriate, for the specific location.***
4.8.7	To facilitate the underground cable, the last remaining pylon would be replaced with a terminal pylon supporting a CSE platform. From here the 132 kV underground cable diversion would be installed as per the 400 kV underground cable alignment but reduced in scope due to the smaller scale of the assets. The installation of underground cable diversions is assumed to be in a single trench typically up to 3 m in width and 1.2 m in depth to the cover (worst-case for deep ploughing). An underground cable Limits of Deviation (LoD) of 35 m has been applied. Sensitive features would be avoided such as heritage assets, woodland including ancient woodland, and ecologically valuable habitats including Sites of Special Scientific Interest (SSSIs), County Wildlife Sites (CWS) and Local Wildlife Sites (LWS). However, it is assumed that any vegetation within the LoD would be removed to ground level during construction and reinstated where practicable following the works.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here has been utilised in acknowledgement that on occasion vegetation removed during construction may not be reinstated, for example where the removed vegetation was invasive or the intended and agreed land use following construction did not support the reinstatement of removed vegetation.'* ***This text describes the proposed works. The assessment is based on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134], with sensitivity testing for the LoD. Therefore, the use of 'where practicable' would not alter assessment conclusions and mitigation would be undertaken, as appropriate, for the specific location.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
4.8.9	These works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required for the 132 kV works. Where practical archaeology would be avoided by these works, but archaeological mitigation would be required in any locations where this is not practicable.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practical' here acknowledges that physical restrictions on-site may mean that avoidance is not possible; in these instances preservation by record would be employed.'* ***The assessment conclusions do not assume preservation in situ, therefore, the use of 'where practicable' does not change the conclusions of assessment.***
4.8.11	Vehicles and equipment would be similar to that required for the proposed 400 kV overhead line and underground cable works but at a reduced scale relevant to the works. A terminal wood pole structure would be installed at each end of the section to be undergrounded to facilitate the transition from overhead line to underground cable. The installation of underground cable diversions is assumed to be in a single trench typically up to 1 m in width with 1.2 m depth to the cover (worst-case for deep ploughing). These would be routed either within the existing highway, highway verges or across farmland (using existing gaps through hedgerows where practicable). An underground cable LoD of 25 m has been applied. Sensitive features would be avoided such as heritage assets, woodland including ancient woodland, and ecologically valuable habitats including SSSIs, CWS and LWS. Any residential gardens included within the Order Limits reflect existing oversail by existing UKPN low voltage, 11 kV and 33 kV and Openreach infrastructure and access to such areas is required to facilitate removal or, for example, stringing works.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here allows for occasions where existing gaps within hedgerows are not of sufficient size or in the right location to facilitate routeing of the cable diversion.'* ***This text describes the proposed works. The assessment is based on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134], with sensitivity testing for the LoD. Therefore, the use of 'where practicable' would not alter assessment conclusions and mitigation would be undertaken, as appropriate, for the specific location.***

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
4.8.12	It is assumed works would be completed using suitable vehicles, for example standard 4x4 or agricultural type vehicles and an excavator (size relevant to the works), which would use the public highway or existing agreed access routes (for the wood pole line), field gates and hedgerow gaps (where practicable). It is assumed there would be no requirement to create new physical temporary access tracks.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here allows for occasions where existing gaps within hedgerows are not of sufficient size or in the right location to facilitate access for work vehicles.'* ***This text describes the proposed works. The assessment is based on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134], with sensitivity testing for the LoD. Therefore, the use of 'where practicable' would not alter assessment conclusions and mitigation would be undertaken, as appropriate, for the specific location.***
4.8.14	These works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required for the low voltage works. Where practical, archaeology would be avoided by these works but archaeological mitigation would be required in any locations where this is not practicable.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practical' here acknowledges that physical restrictions on site may mean that avoidance is not possible; in these instances preservation by record would be employed.'* ***The assessment conclusions do not assume preservation in situ, therefore, the use of 'where practicable' does not change the conclusions of assessment.***
5.3.3	Avoidance would be undertaken where it would be practicable to amend design/construction works areas to allow for retention of the archaeological remains in situ and where those archaeological remains are found to be of significant value to require this form of mitigation. Relevant protection measures would include temporary protective fencing which will be maintained throughout the	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here allows for instances where there is not sufficient space around the identified assets to create a 10 m buffer area or where essential, pre-agreed, activities are required to take place within the 10 m buffer area.'*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
	pre commencement works and construction stages (incorporating an additional 10 m buffer area for specific identified designated and non-designated assets where practicable). Some sites may require archaeological photographic recording prior to protection measures to ensure that there is a record of their existing condition, prior to the start of any groundworks.	***Unless already secured as embedded mitigation, the assessment conclusions do not assume preservation in situ, therefore, the use of 'where practicable' does not change the conclusions of assessment.***
5.3.22	Geoarchaeology studies should follow the guidance provided by Historic England (2015b), Norfolk County Council (2018), Suffolk County Council Archaeology Service (SCCAS) (2018) and Essex County Council (2020). Buried soils and sediment sequences may be inspected and recorded on site at all intrusive stages of the Project by a geoarchaeologist where practicable in order to produce a geoarchaeological deposit model. Historic records of previous ground investigation, where available, may also be consulted to inform the deposit model. This model can then provide further understanding of site formation processes and subsequently reduce or avoid the collection and processing of redundant samples during further intrusive works or provide an outcome as mitigation.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here allows for instances where it may be unsafe for a geoarchaeologist to be present on-site or it is not archaeologically advantageous for a geoarchaeologist to be present on-site to inspect buried soils and sediment sequences.'* ***'Where practicable' has been deleted from this paragraph in the most recent version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] submitted at Deadline 5.***
5.3.24, fourth bullet	The location and extent of any waterlogged organic deposits should be identified, and where practicable, samples should be retrieved to assess the preservation potential of environmental remains and the suitability of material for scientific dating.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here acknowledges that in some instances it may not be physically possible to retrieve samples of waterlogged organic deposits or it may be determined through appropriate consultation that the taking of samples is not archaeologically advantageous.'*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		This is one of a suite of measures that could be used to record archaeological remains as part of mitigation. The assessment conclusions do not assume use of this measure, therefore, the use of 'where practicable' does not change the conclusions of assessment.
5.3.32	Where spoil is removed from a site its final destination should, where practicable, be ascertained and described in the relevant grey literature report.	**Justification of the use of the term 'where practicable' taken from SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. *'The use of 'where practicable' here acknowledges that in some instances the final destination of spoil removed from site may not be known at the time the grey literature report is produced.'* ***This is one of a suite of measures that could be used to mitigate impacts to archaeological remains. The assessment conclusions do not assume use of this measure, therefore, the use of 'where practicable' does not change the conclusions of assessment.***

ii. Construction Traffic Management Plan and Public Rights of Way Management Plan

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
Construction Traffic Management Plan [REP4-174]		
Paragraph 5.5.1	Active Travel Traffic Management *'When forming site access points, connectivity for active travel users (footways and cycleways) will be preserved, where safe and practicable'*	The Applicant has followed LTN1/20 guidance[39] where appropriate for the increased level of construction traffic to enable safe active travel routes, resulting in the inclusion of the non-motorised user route for Bentley Road. An assessment of significant effects on the impact resulting from road closures was assessed within Section 16 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The assessment for pedestrians, cyclists and horse riders was undertaken on the basis that movements of active travel modes would be retained where highway mitigation is proposed at site access points. An assessment of a full road closure and associated temporary traffic management measures to manage the construction of site access points was not undertaken within the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. This is because in these isolated instances, site-specific assessments will be developed by the Main Works Contractor during development of their traffic management plans and permit applications. These would be discussed and agreed with the relevant Local Highway Authority to ensure the safe movement of users of active travel modes is provided.
Paragraph 5.8.7	Duration of Traffic Management: *'To reduce the impact on local road users, the length of the traffic management measures would be kept to a minimum and left in situ for the shortest duration as far as is reasonably practicable.'*	Detail on the Permit Schemes are included within Section 2.4 **7.3 Outline Construction Traffic Management Plan [Revision D]**. The Applicant has updated paragraph 5.8.7 of **7.3 Outline Construction Traffic Management Plan [Revision D]** to remove the 'as far as is reasonably practicable'.

[39] Department for Transport (2020) *Local Transport Note 1/20 Cycle Infrastructure Design*

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
Paragraph 5.8.10	Diversion Routes: *'Where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available.'*	The assessment within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** was undertaken on the basis that suitable diversion routes would be provided. The Applicant will endeavour to provide a diversion route of the same standard or higher, where these are available and where it is appropriate to do so. Detailed assessments of diversion routes which do not fall on Primary Access Routes, have not been undertaken within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. These assessments will be undertaken and developed by the Main Works Contractor during development of their traffic management plans and permit applications and would be discussed and agreed with the relevant Local Highway Authority to ensure the safe movement of all users. These will include any signage or traffic management measures required to manage vehicle speeds and movements along the diversions.
Outline Public Rights of Way Management Plan [REP4-178]		
Paragraph 2.4.1	*'the approach to management regimes has been to minimise disruption to PRoW users as far as practicable and to keep PRoWs open, or subject to minor diversions only, wherever possible*'.	In the context of this paragraph, 'practicable' means the approach taken aims to keep PRoWs open except where doing so would not be reasonably, or successfully, achievable without compromising safety, construction feasibility, environmental protection, landowner requirements, or the sequencing of, and access to, the works. A worst-case assessment of significant effects on pedestrians, cyclists and horse riders delay within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has been undertaken on the basis that the management regimes and durations identified for all PRoWs within Table 7.3 of **7.6 Outline Public Rights of Way Management Plan [Revision C]** would be in place with the aim of minimising disruption to users whilst ensuring public safety.

Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		Therefore, should the duration of the works and reinstatement finish earlier than expected, this would have a positive effect by reducing the length of time users on that PRoW will be impacted by the Project.
Paragraph 3.2.1 and Paragraph 4.1.1	'*the intention has been to minimise the disruption to PRoW users as far as reasonably practicable'* *'However, the intention is to keep PRoWs open where practicable subject to management measures'*	See response to paragraph 2.4.1 above.
Paragraph 4.1.3	*'All PRoWs temporarily affected during construction will be reinstated as soon as practicable after completion of construction works to their previous use, alignment and condition informed by pre-commencement condition surveys'.*	In this context 'as far as practicable' means that reinstatement will be carried out at the earliest point it is reasonably achievable to do so successfully, without compromising safety, construction feasibility, environmental protection, landowner requirements or the sequencing of, and access to, construction works and without the risk of having to reimpose any temporary management regimes. For clarity, the indicative durations set out in **7.6 Outline Public Rights of Way Management Plan [Revision C]** include the time required to reinstate each PRoW, and therefore represent the full period during which a PRoW is anticipated to be subject to temporary management regimes. Should construction finish earlier than anticipated, the PRoW would be reinstated and reopened as soon as the aforementioned requirements are met. A worst-case assessment of significant effects on pedestrians, cyclists and horse riders delay within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has therefore been undertaken on the basis that the management regimes and durations identified for all PRoWs within Table 7.3 of **7.6 Outline Public Rights of Way Management Plan [Revision C]** would be in place. Therefore, should the duration

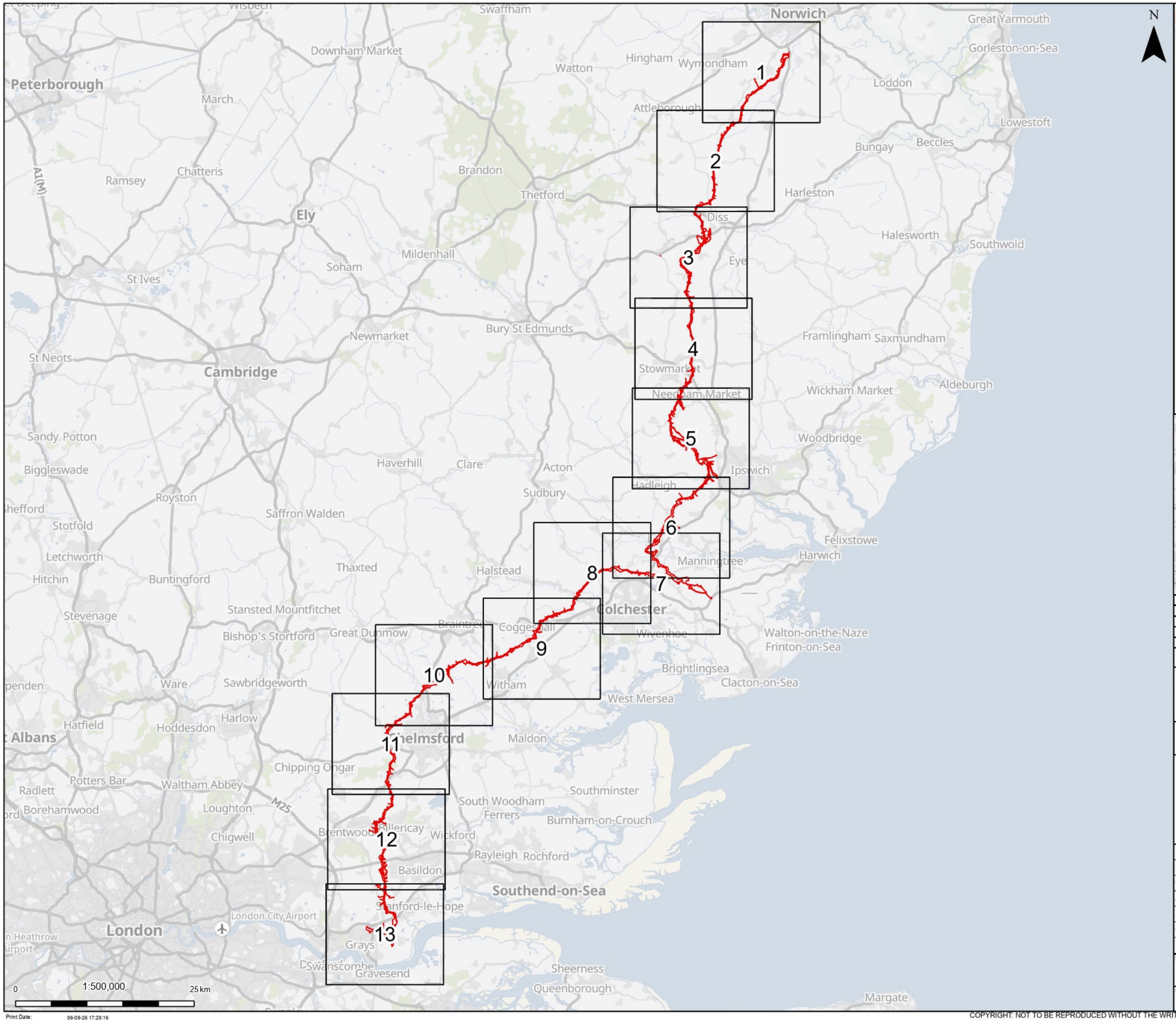
Commitment / Text Reference	Commitment/Wording	Justification of 'where practicable'
		of the works and reinstatement finish earlier than expected, this would have a positive effect by reducing the length of time users on that PRoW will be impacted by the Project.
Paragraph 4.2.26	*'PRoWs that are subject to temporary closure and diversion could have such arrangements in place for the entire construction period of the Project. However, National Grid would endeavour to ensure any such durations are minimised as far as practicable and PRoWs would be reopened at the earliest opportunity if no longer affected by the construction activities'.*	In this context 'as far as practicable' means that the Applicant will aim to minimise the duration of temporary closure and diversion of PRoWs to the point where further reduction is not reasonably achievable without compromising user safety, construction feasibility, environmental protection, landowner requirements or the sequencing of, and access to, construction works. Where a PRoW is no longer affected by construction activities it would be reopened at the earliest opportunity, as soon as the aforementioned requirements are met. For clarity, the indicative durations set out in **7.6 Outline Public Rights of Way Management Plan [Revision C]** include the full period during which a PRoW may be subject to temporary closure, diversion or managed access, including the time required to return the PRoW to its original alignment and condition. A worst-case assessment of significant effects on pedestrians, cyclists and horse-riders delay within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has been undertaken on the basis that the management regimes identified for all PRoWs where temporary closure and diversions are proposed within Table 7.3 of **7.6 Outline Public Rights of Way Management Plan [Revision C]** would be in place. Therefore, should the duration of the works and reinstatement finish earlier than expected, this would have a positive effect by reducing the length of time users on that PRoW will be impacted by the Project.

Appendix E.
LV 2.8

nationalgrid

Appendix E
LV 2.8

E.1 Cumulative Effects on LCA or LCT in E1



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A	May 2026	FOR DCO APPLICATION	SS	AF	KB

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types Overview

Designed	J. Ginty	Date	May 26
Drawn	S. Sarkar	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
Scale:	1:500,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

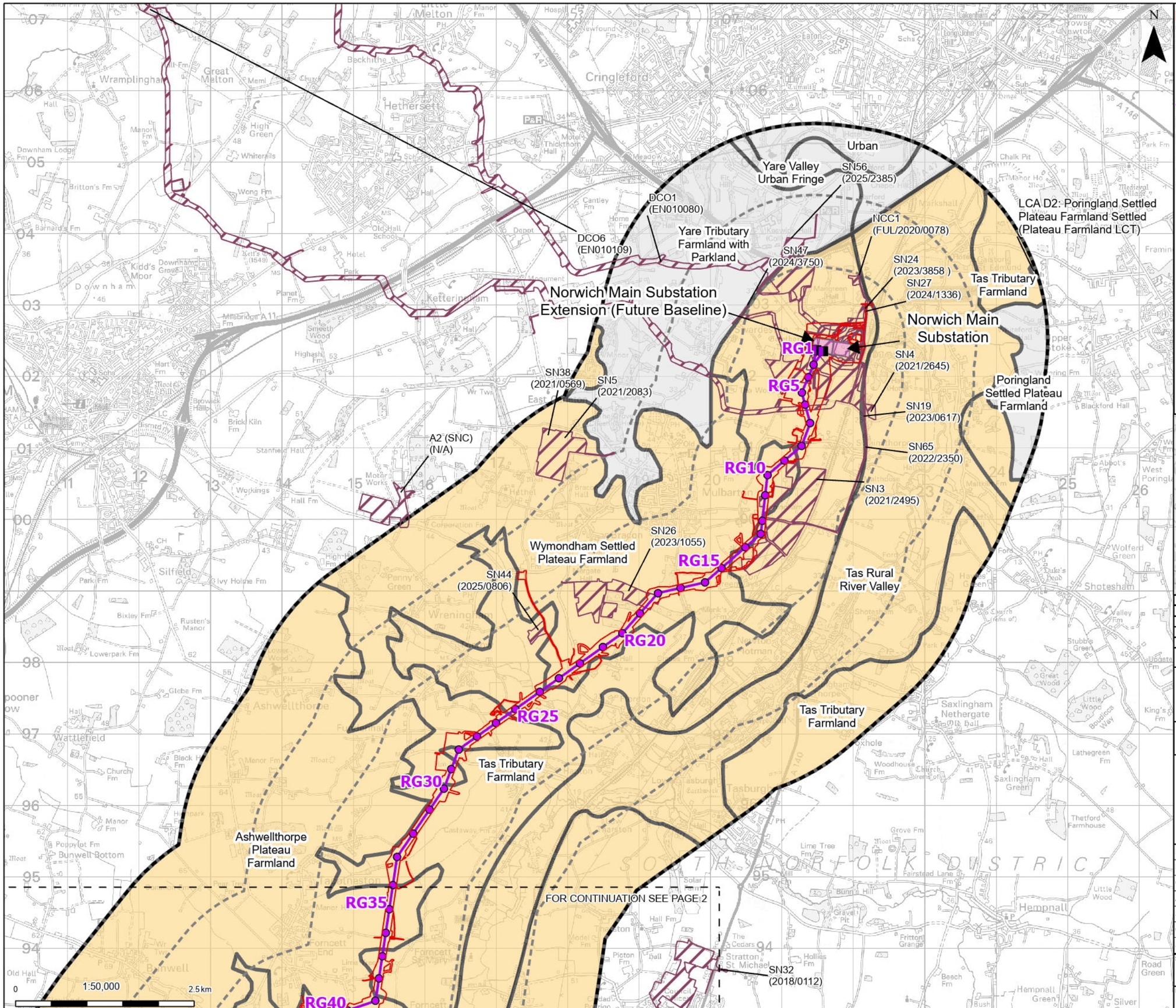
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Revision: A

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Proposed project design details

Proposed full line tension gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Norwich Main Substation
Norwich Main Substation Extension (future baseline)

Discipline specific constraints

1 km buffer
2 km buffer

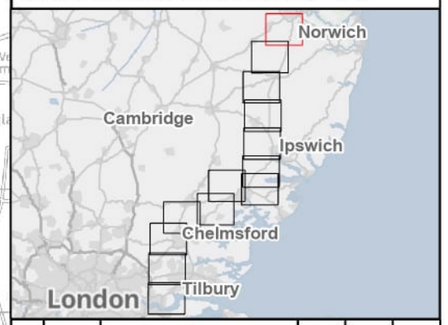
LVIA Study Area
Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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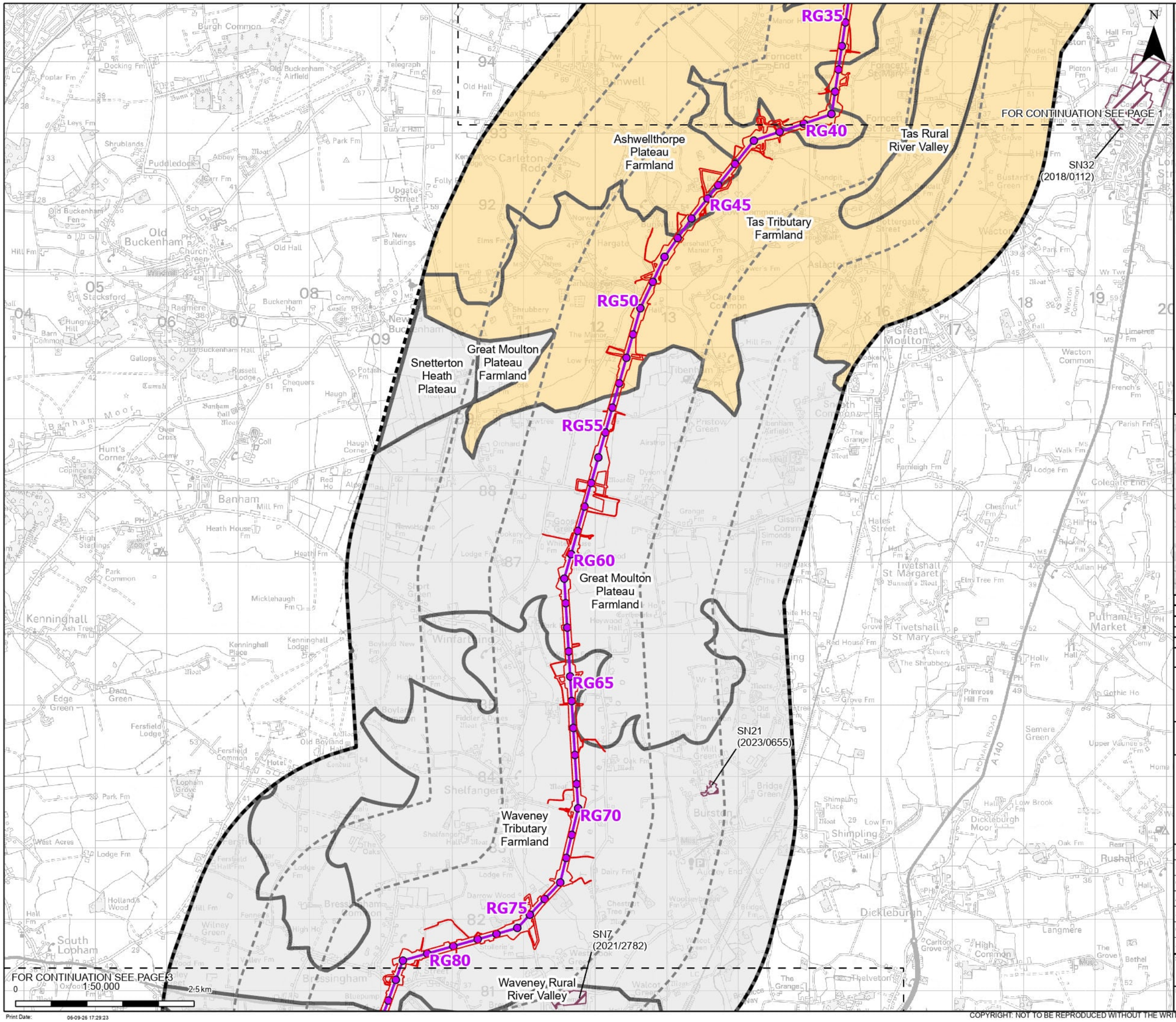
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Drawn	S. Sarkar	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

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Proposed project design details

Proposed standard lattice pylon location

Proposed overhead line alignment

Discipline specific constraints

1 km buffer

2 km buffer

LVIA Study Area

Short list of cumulative developments

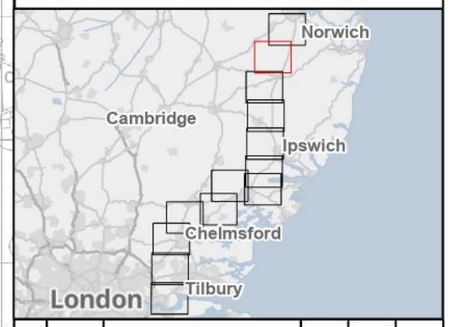
Landscape Character Areas/ Types

Significant cumulative effects identified

No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
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8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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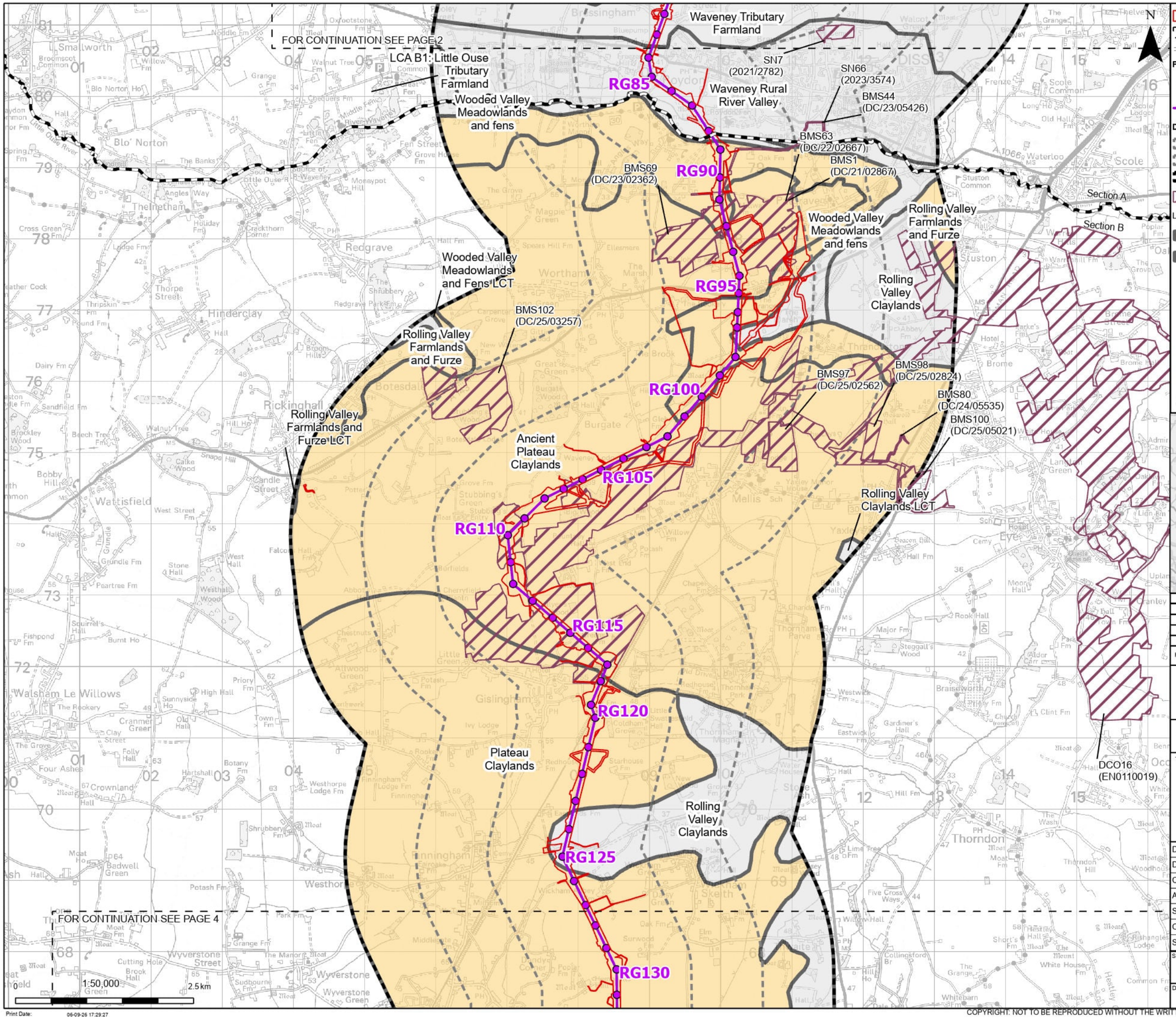
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Sheet index cutline
Project section line

Proposed project design details

Proposed standard lattice pylon location
Proposed overhead line alignment

Discipline specific constraints

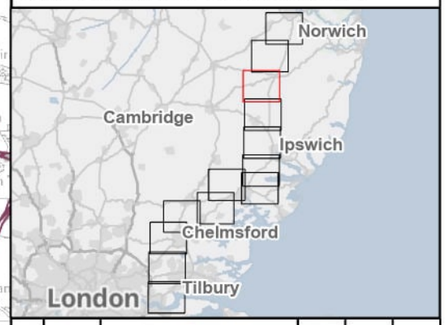
1 km buffer
2 km buffer
LVIA Study Area
Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

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Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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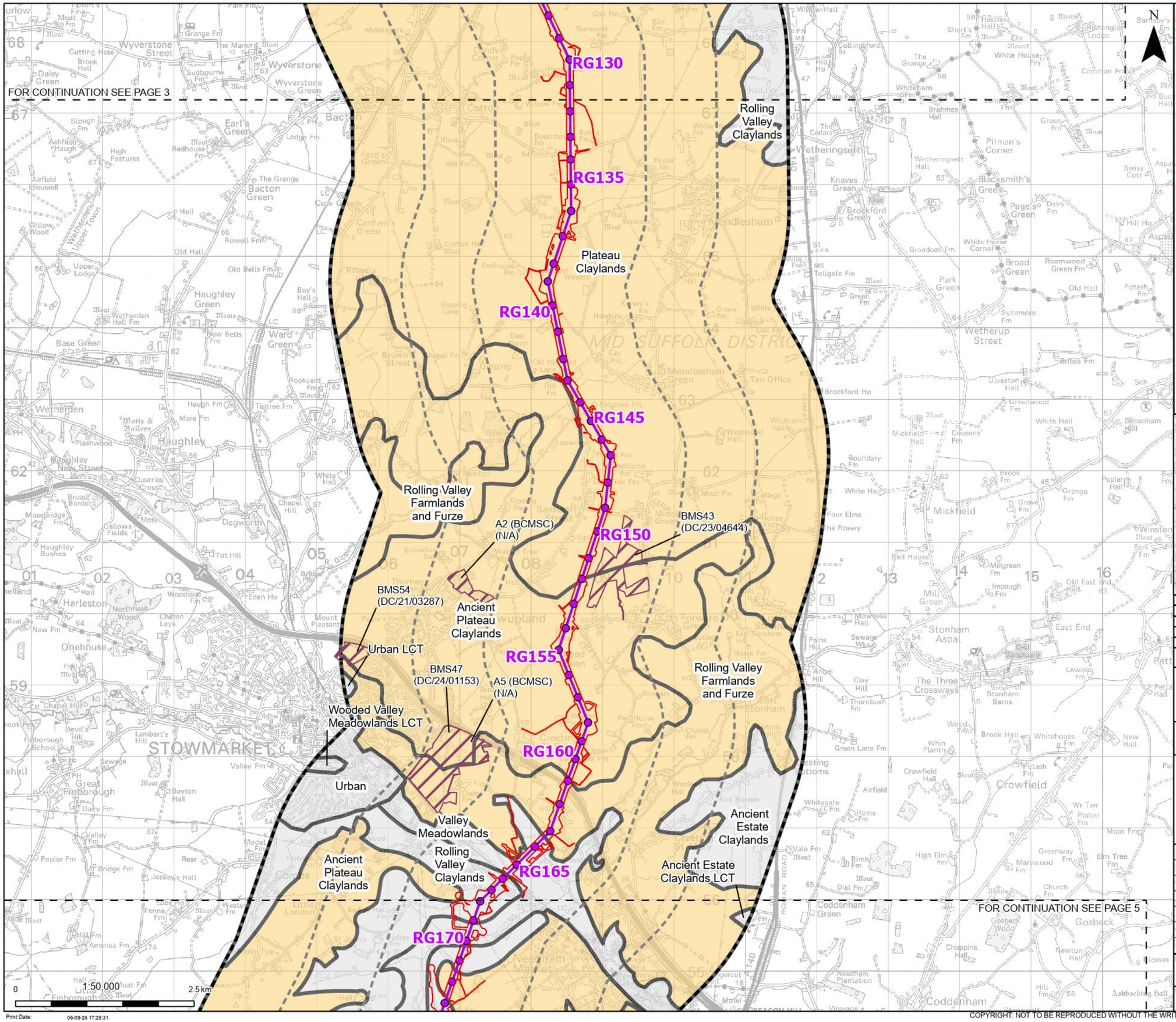
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Suitability Description:
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Proposed project design details

Proposed standard lattice pylon location

Proposed overhead line alignment

Discipline specific constraints

1 km buffer

2 km buffer

LVIA Study Area

Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified

No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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nationalgrid

PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:

8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 4 of 13

Designed	J. Ginty	Date	May 26
Drawn	S. Sarkar	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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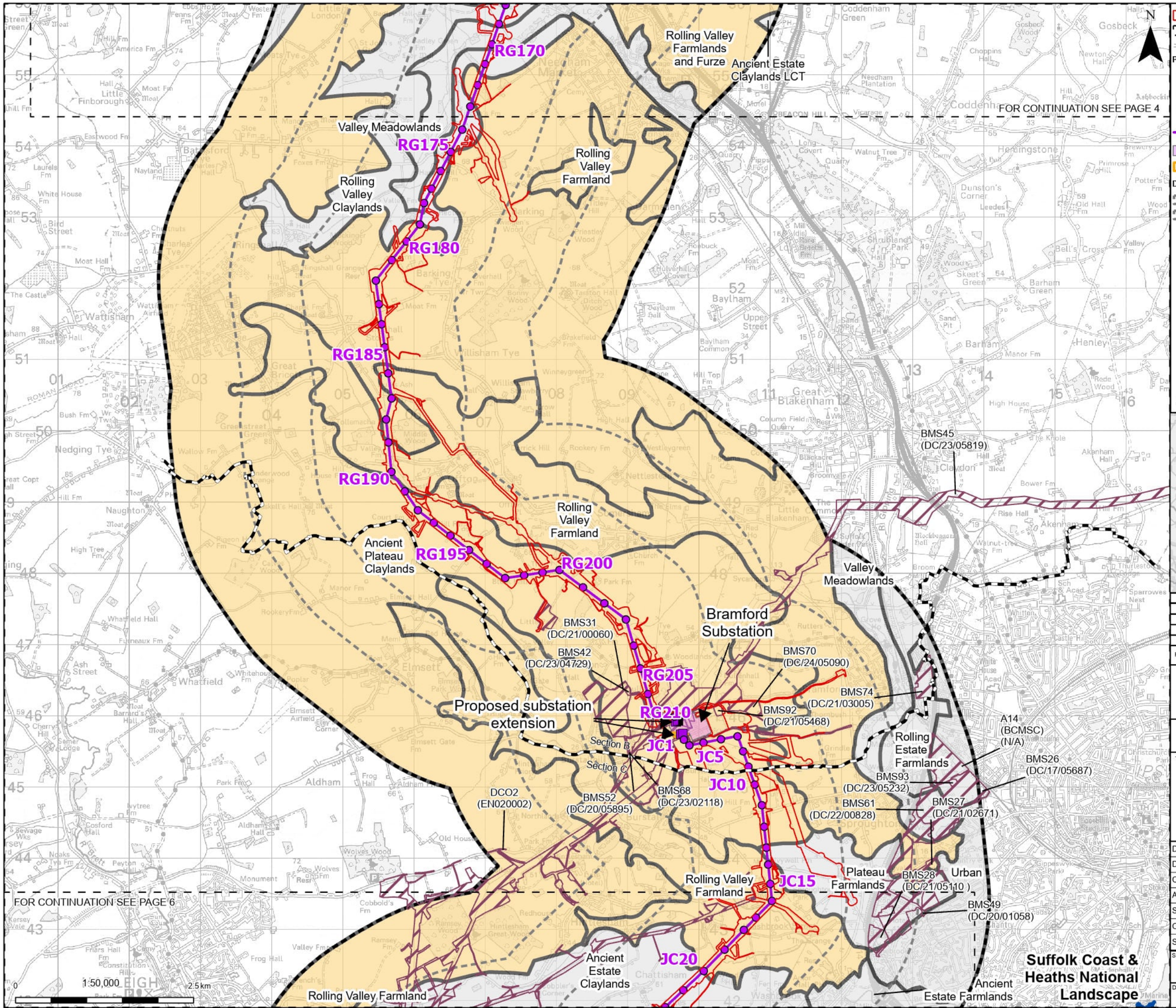
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Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00921

Revision: A

Print Date: 06-09-26 17:29:31

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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed full line tension gantry
Proposed low duty gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Bramford Substation
Bramford Substation Extension

Discipline specific constraints

1 km buffer
2 km buffer

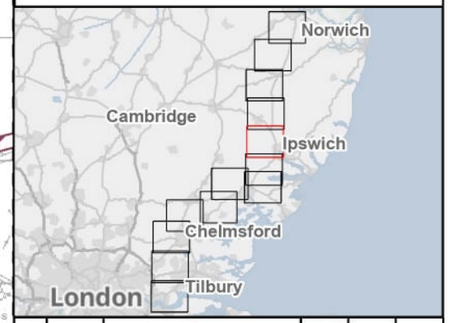
LVIA Study Area
National Landscape
Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 5 of 13

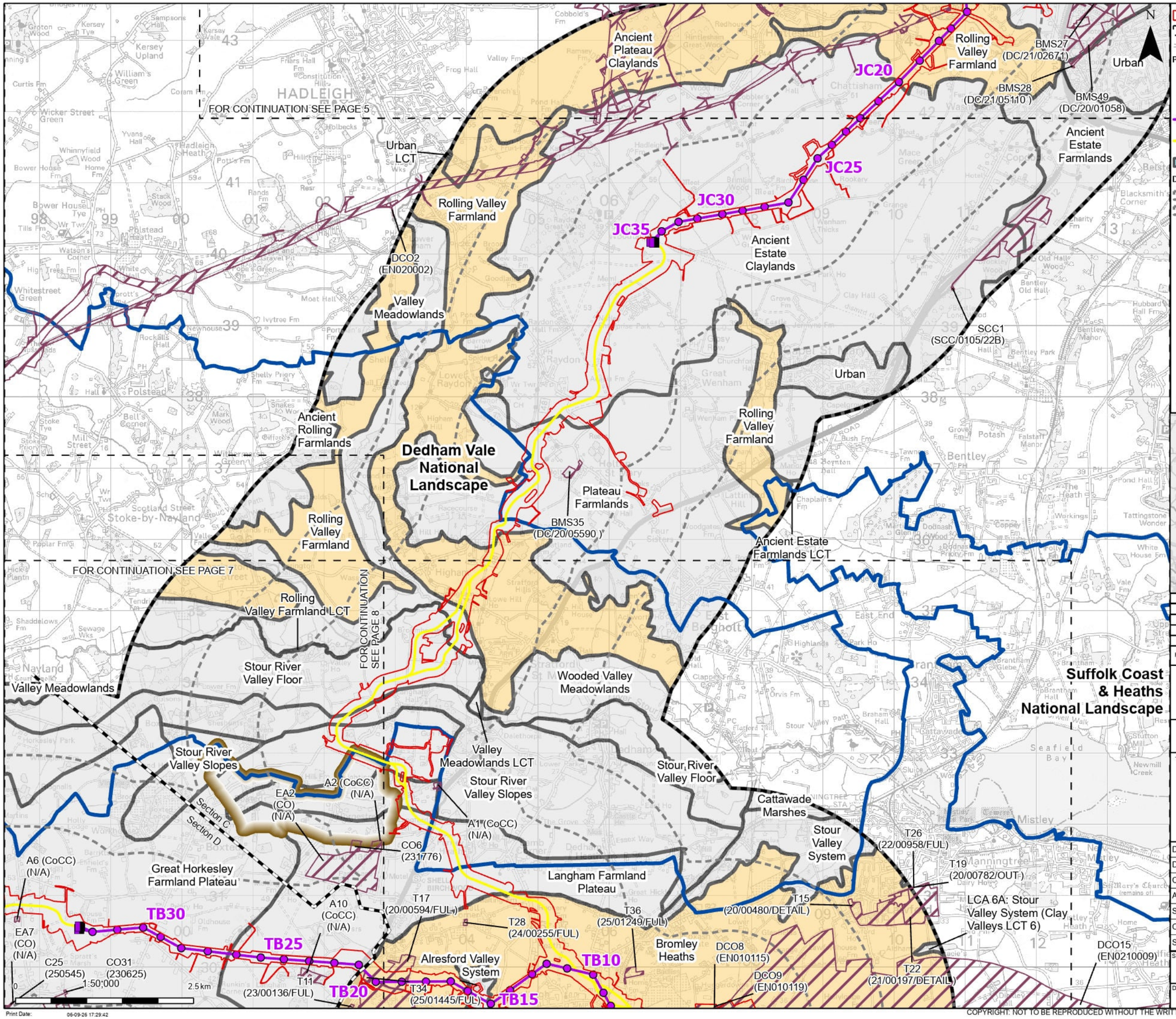
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Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Original Size:	A3	Grid:	OS
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Suitability Description:
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Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00921
Revision: A

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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed full line tension gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Proposed underground cable alignment
Proposed cable sealing end compound (CSEC)

Discipline specific constraints

1 km buffer
2 km buffer

LVIA Study Area
National Landscape
Stour Valley Project Area
Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title: 8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 6 of 13

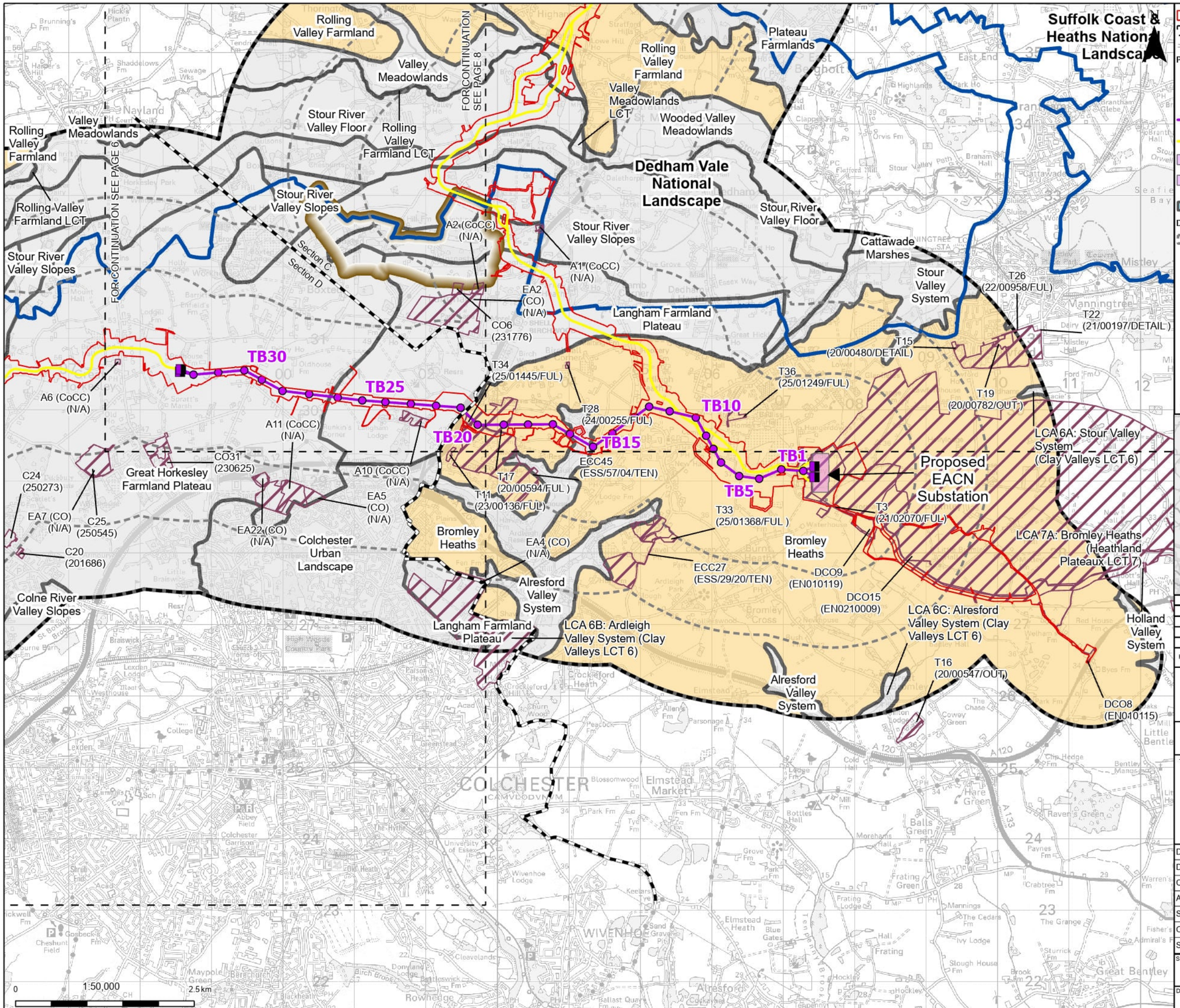
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Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description: Accepted as Concept Stage

Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00921
Revision: A

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:

8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types

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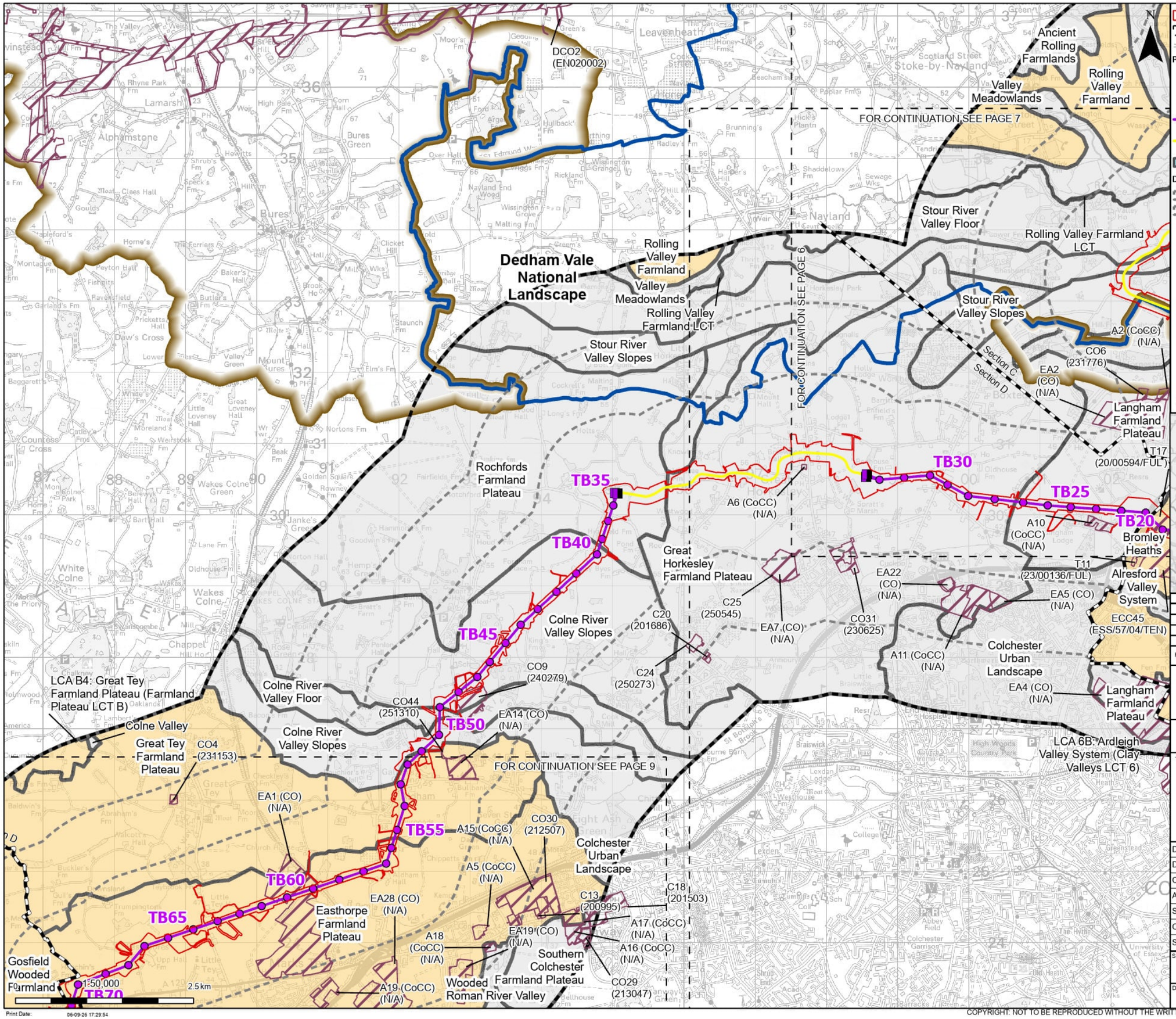
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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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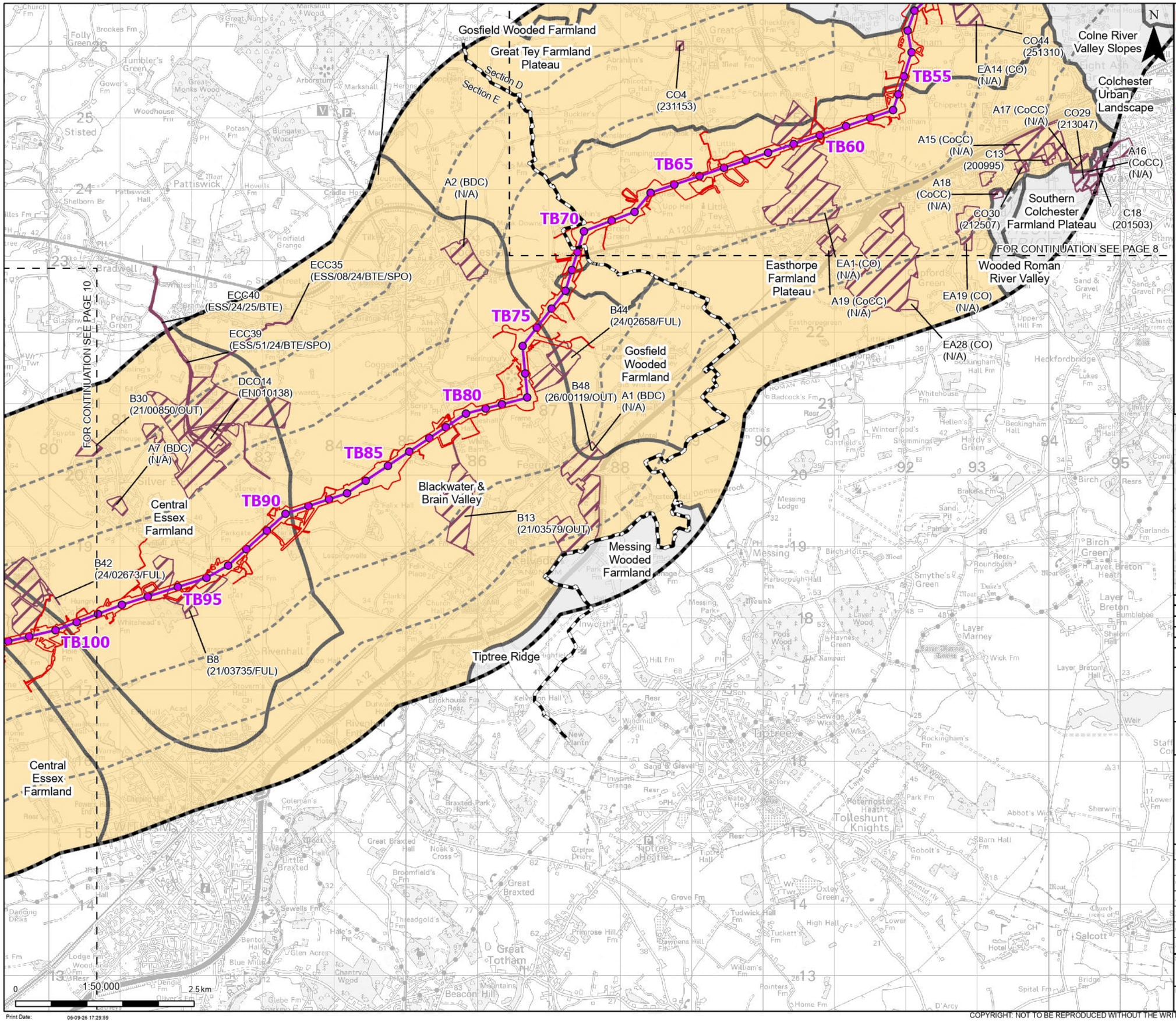
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Suitability Description:
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Revision: A

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Project section line

Proposed project design details

Proposed standard lattice pylon location
Proposed overhead line alignment

Discipline specific constraints

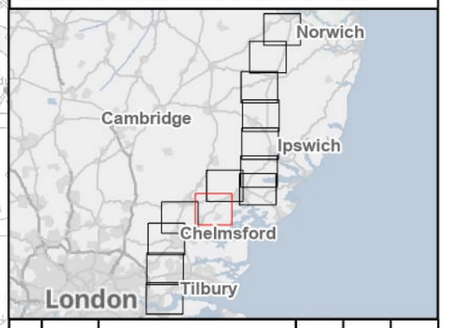
1 km buffer
2 km buffer
LVIA Study Area
Short list of cumulative developments

Landscape Character Areas/ Types

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title: 8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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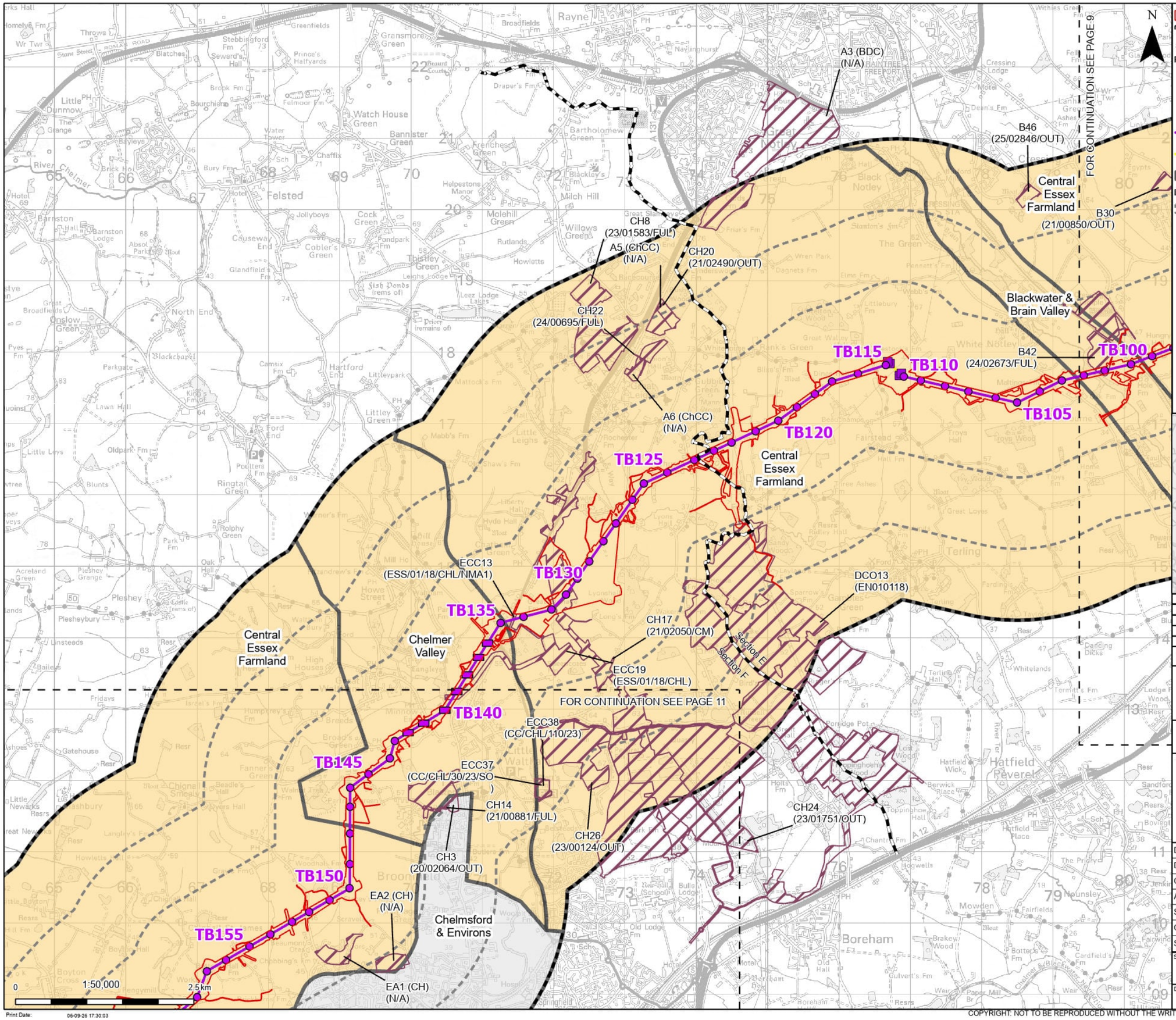
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Suitability Description: Accepted as Concept Stage

Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00921
Revision: A

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title: 8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
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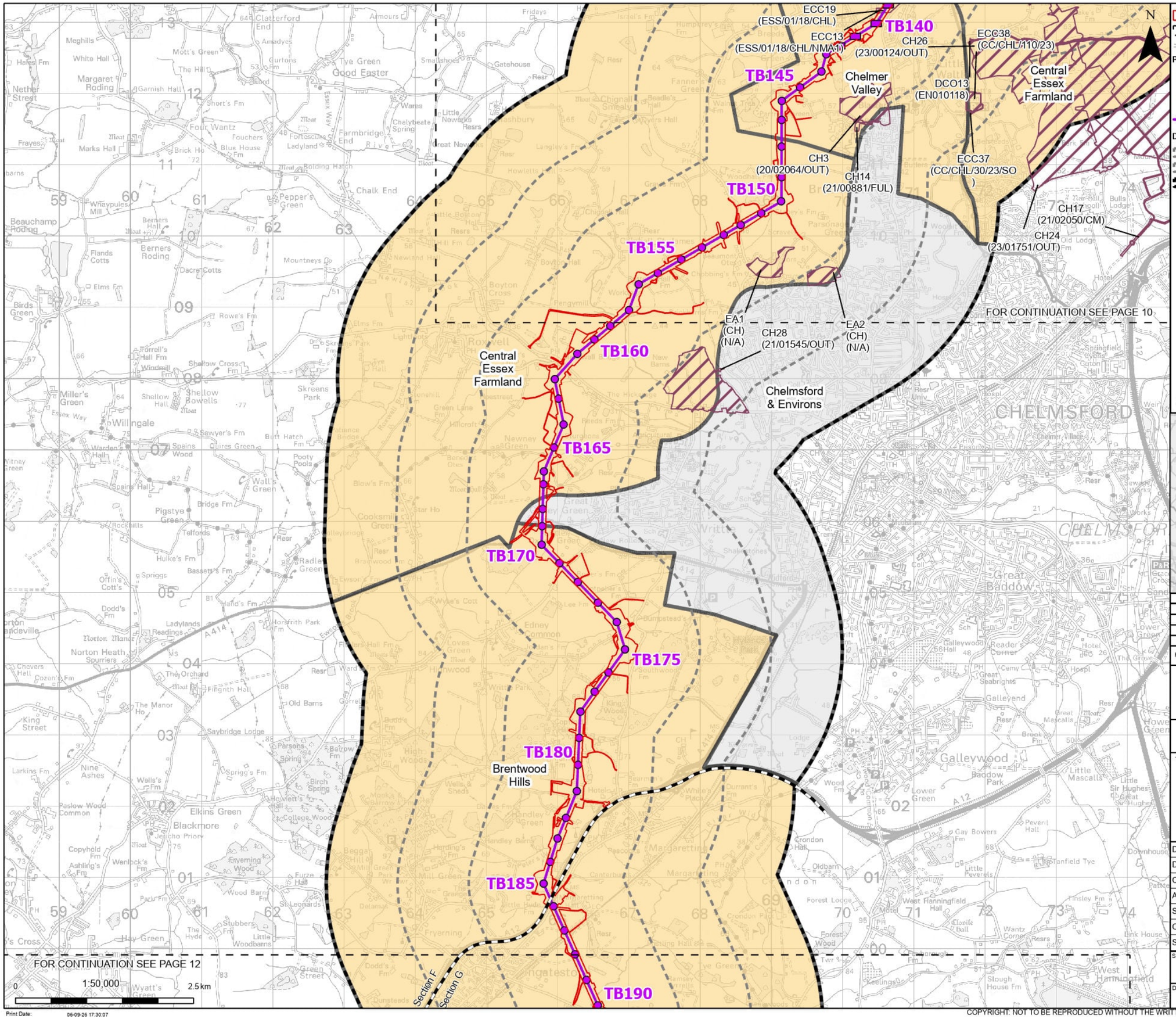
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Suitability Description: Accepted as Concept Stage

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nationalgrid

PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 11 of 13

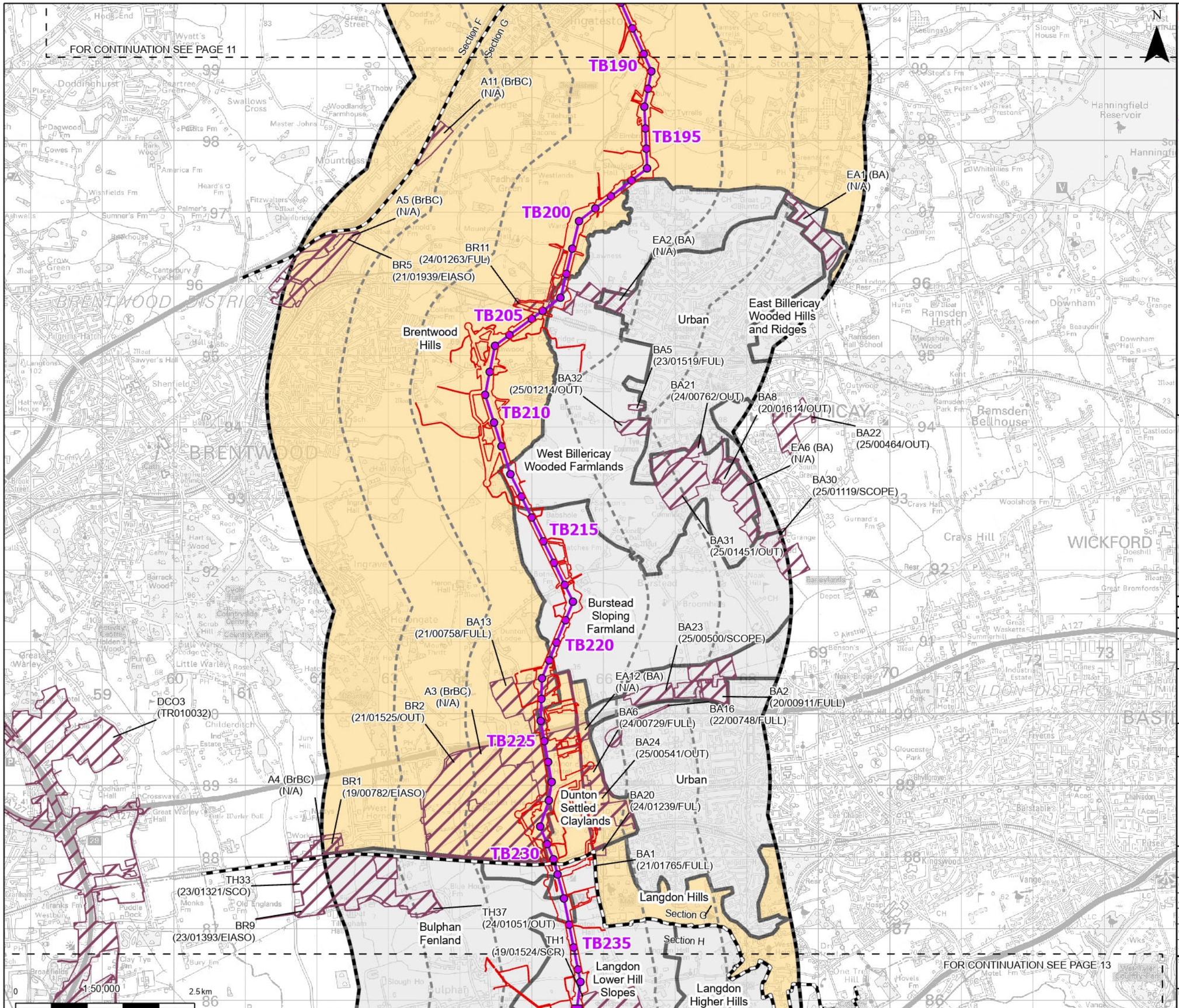
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Suitability Description:
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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 12 of 13

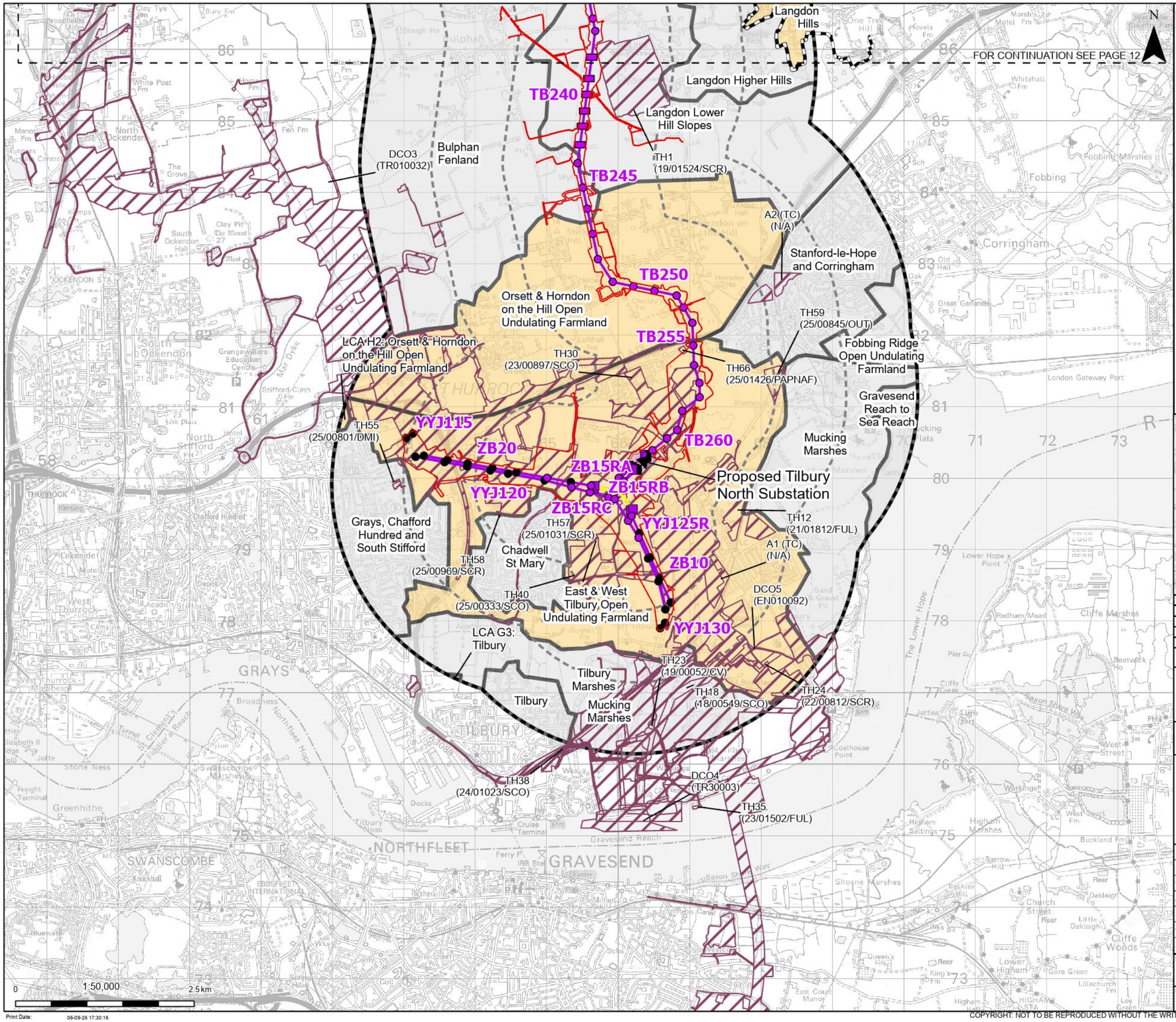
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Suitability Code:	A2	Project Number:	10059280

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Revision: A

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Order limits
Sheet index cutline
Project section line

Proposed project design details

- Proposed full line tension gantry
- Proposed low duty gantry
- Proposed low height pylon location
- Existing pylon (modify)
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Proposed underground cable alignment
- Proposed Tilbury North Substation
- Proposed cable sealing end compound (CSEC)

Discipline specific constraints

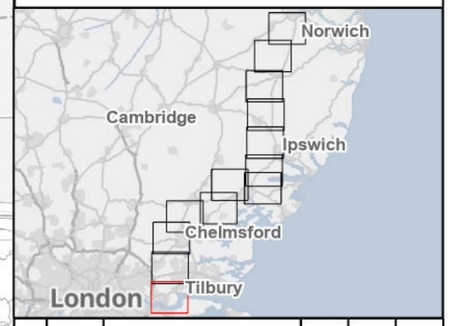
- 1 km buffer
- 2 km buffer
- LVIA Study Area
- Short list of cumulative developments

Landscape Character Areas/ Types

- Significant cumulative effects identified
- No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027
Regulation 5(2)(a)

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Landscape Character Areas and Types
Page 13 of 13

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Drawn	S. Sarkar	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Revision: A

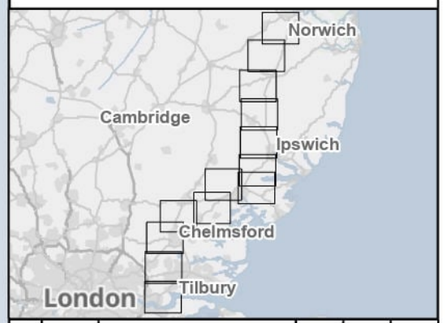
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E.2 Cumulative Effects on Visual Receptor Areas in E2

N

Order limits
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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas Overview

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Drawn	N. Banu	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Suitability Description:
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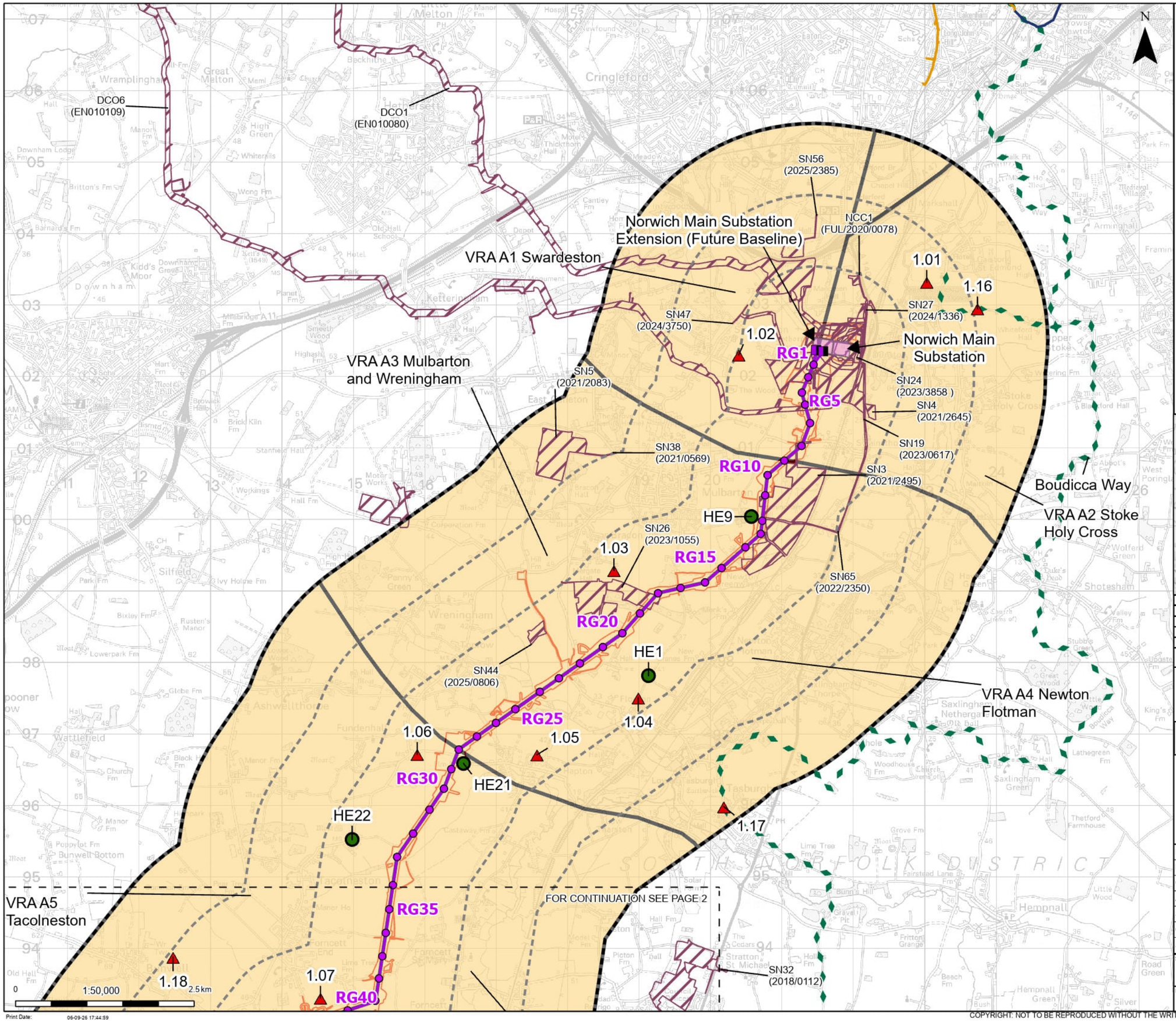
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Revision:
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0 1:500,000 25 km

Print Date: 06-09-26 17:44:54

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Order limits
Sheet index cutline

Proposed project design details

Proposed full line tension gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Norwich Main Substation
Norwich Main Substation Extension (future baseline)

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
ES landscape viewpoints

Additional historic environment viewpoints
Long distance path
Cumulative developments

National cycle networks

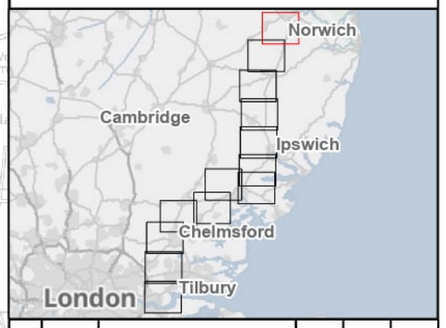
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 1 of 13

Designed	J. Ginty	Date	May 26
Drawn	N. Banu	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Original Size:	A3	Grid:	OS
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Suitability Description:
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Revision: A

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VRA A5
Tacolneston

RG35

1.18

1.07

1.20

RG40

1.08

RG45

SN32
(2018/0112)

N

FOR CONTINUATION SEE PAGE 1

VRA A6
Forncett
St Peter

RG50

1.09

VRA A7 Goose
Green

1.10

RG55

VRA A8 Tibenham

1.11

HE10

RG60

HE23

RG65

1.12

VRA A9 Shelfanger

VRA A10 Burston

SN21
(2023/0655)

RG70

RG75

RG80

SN7
(2021/2782)

1.14

1.13

Boudicca Way

FOR CONTINUATION SEE PAGE 3

0 1:50,000 2.5 km

Print Date: 06-09-26 17:45:04

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Proposed project design details

Proposed standard lattice pylon location
Proposed overhead line alignment

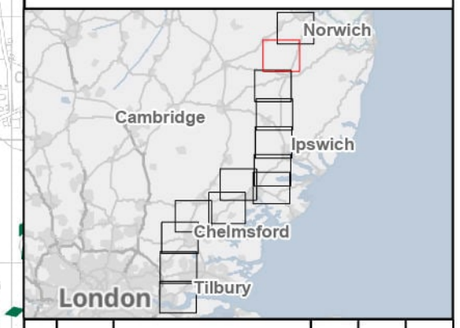
Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
ES landscape viewpoints
Additional historic environment viewpoints

Long distance path
Cumulative developments
Visual Receptor Area
Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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nationalgrid

PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

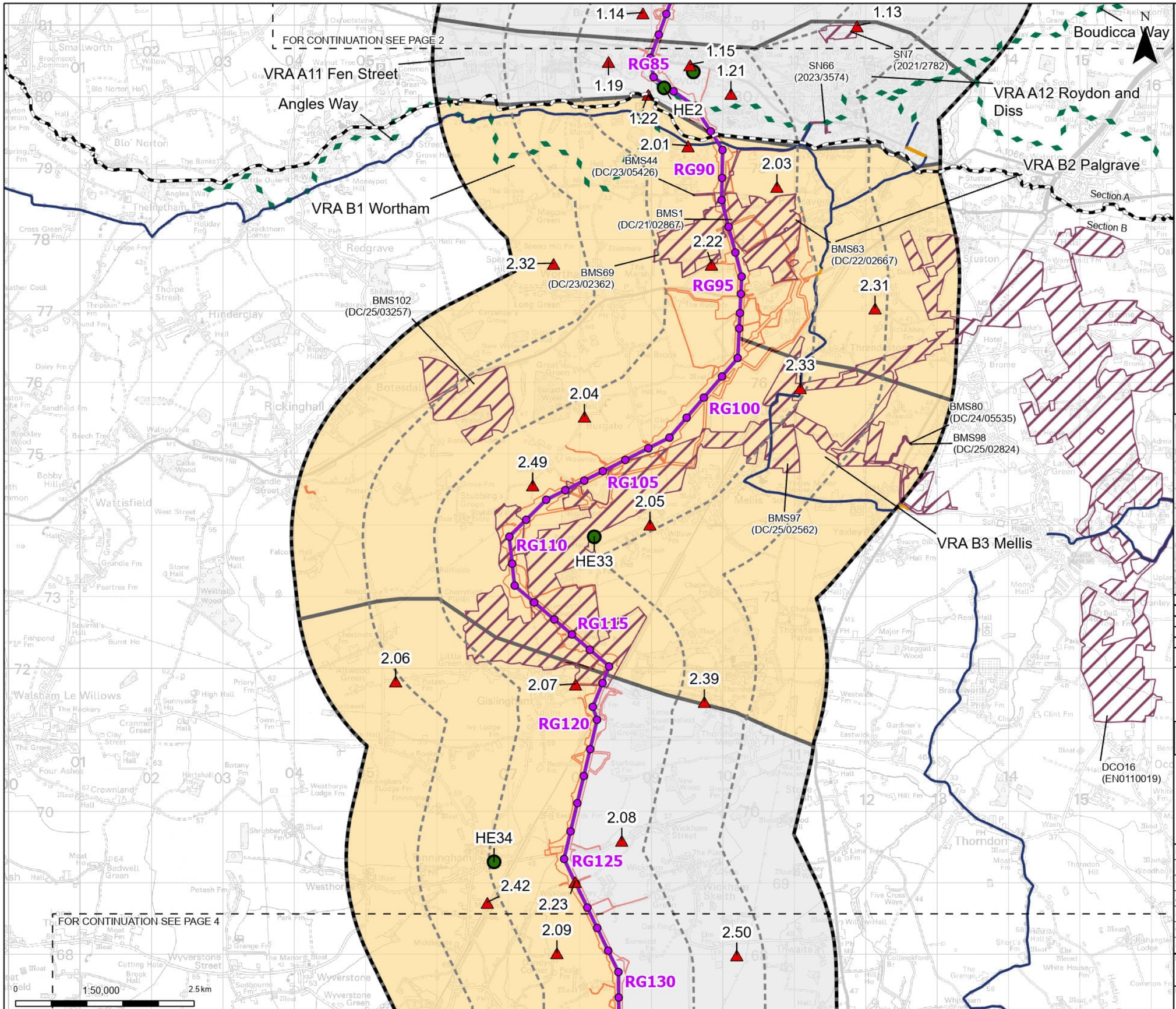
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Page 2 of 13

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Approved	K. Burrows	Date	May 26
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Suitability Description:
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Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00922
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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

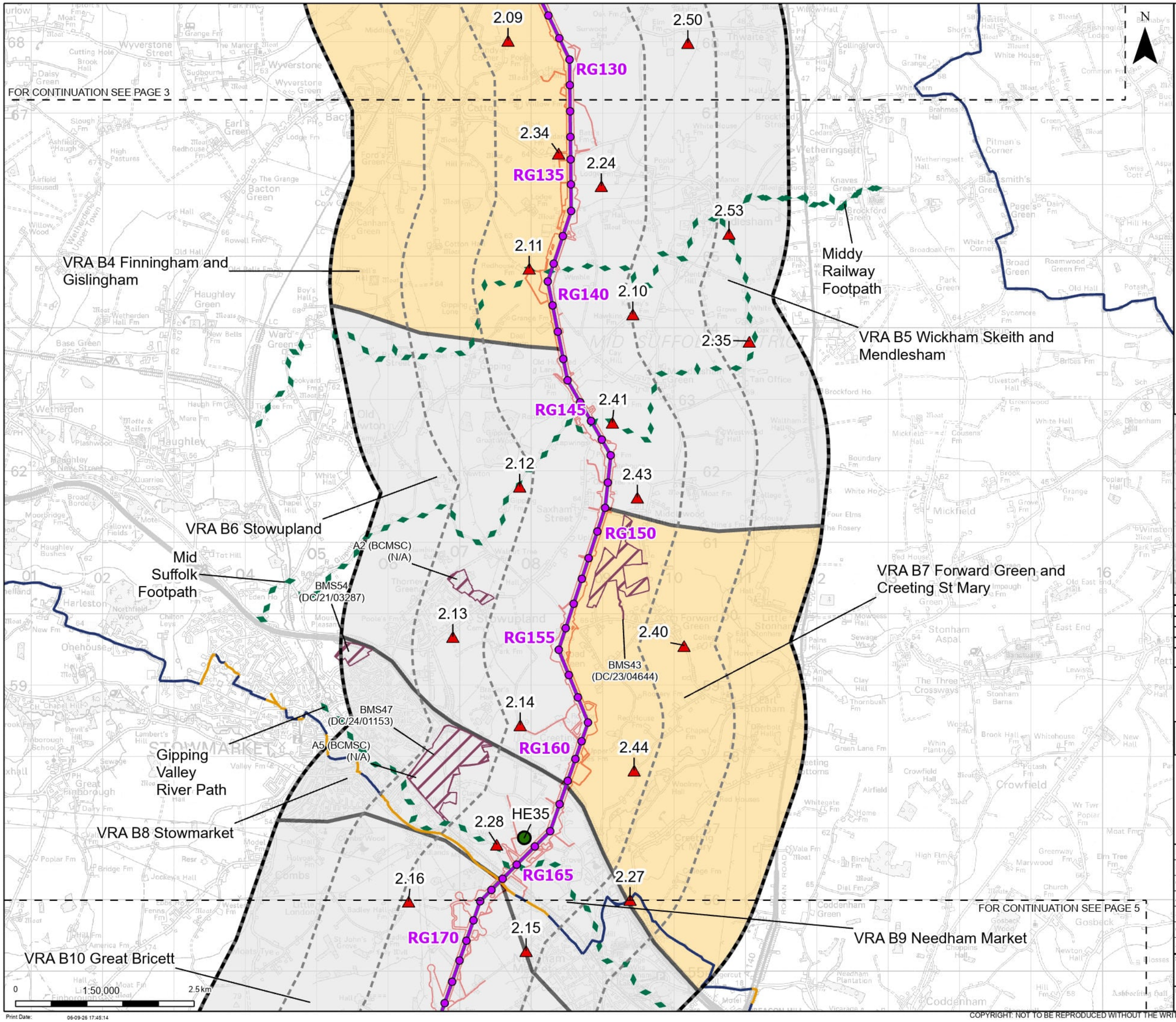
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8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 3 of 13

Designed	J. Ginty	Date	May 26
Drawn	N. Banu	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
Scale:	1:50,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
Accepted as Concept Stage

Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00922
Revision: A

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:

8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 4 of 13

Designed	J. Ginty	Date	May 26
Drawn	N. Banu	Date	May 26
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Approved	K. Burrows	Date	May 26
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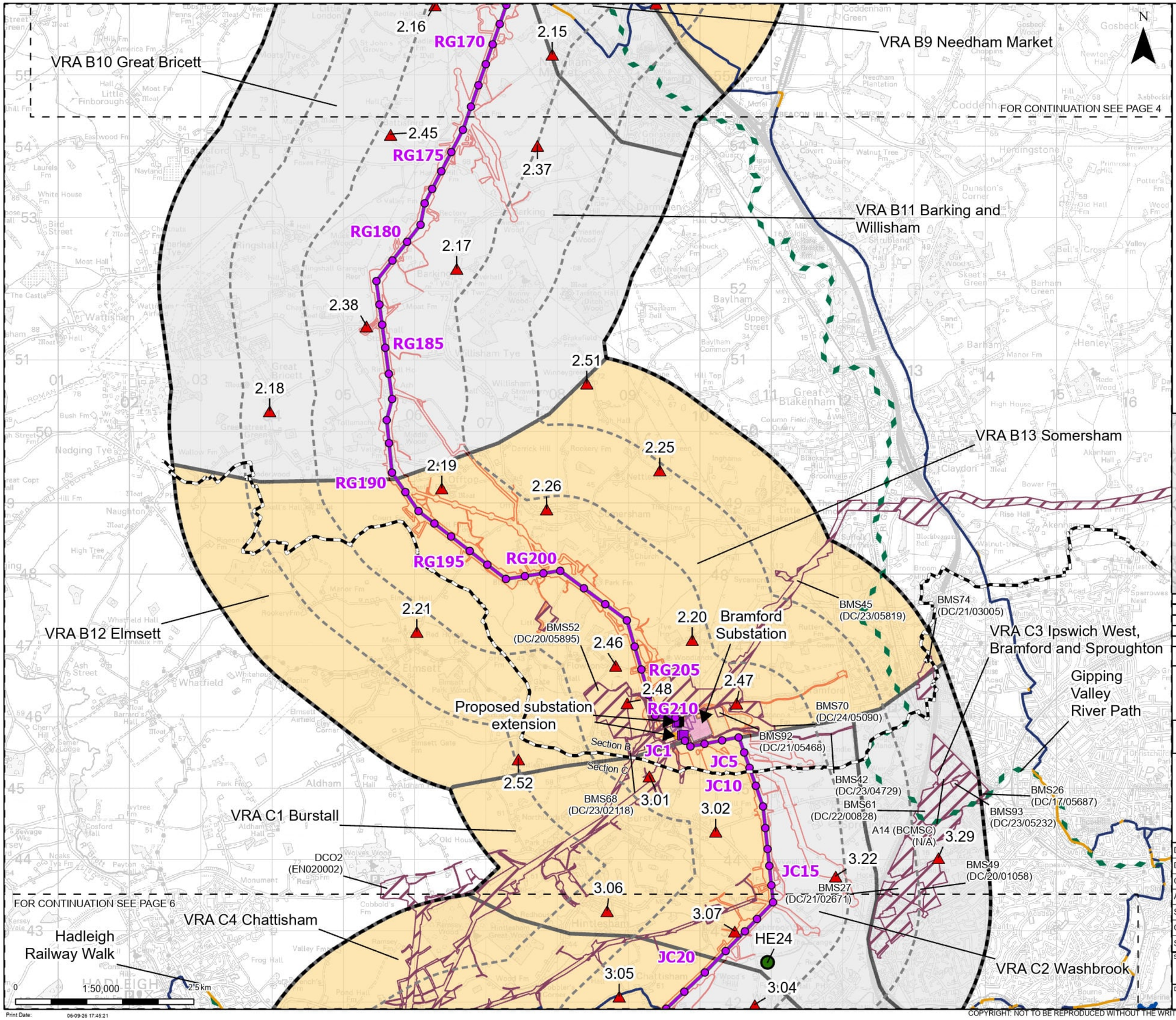
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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed full line tension gantry
Proposed low duty gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Bramford Substation
Bramford Substation Extension

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
National landscape
ES landscape viewpoints

Additional historic environment viewpoints
Long distance path
Cumulative developments

National cycle networks

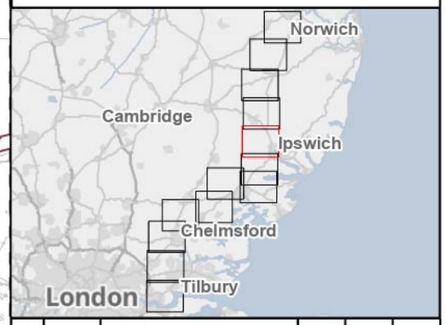
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:

8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 5 of 13

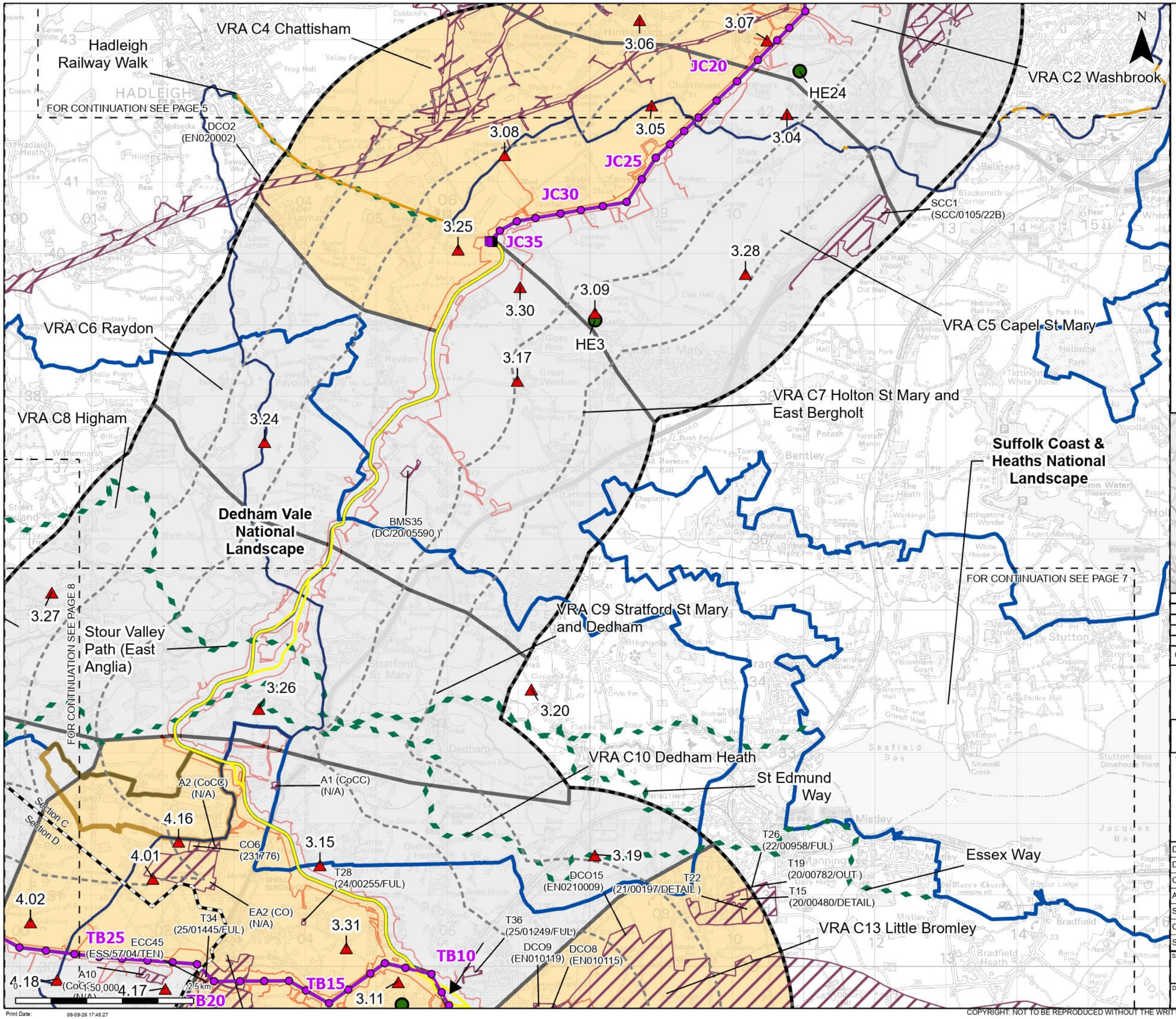
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Suitability Description: Accepted as Concept Stage

Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00922

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title: 8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 6 of 13

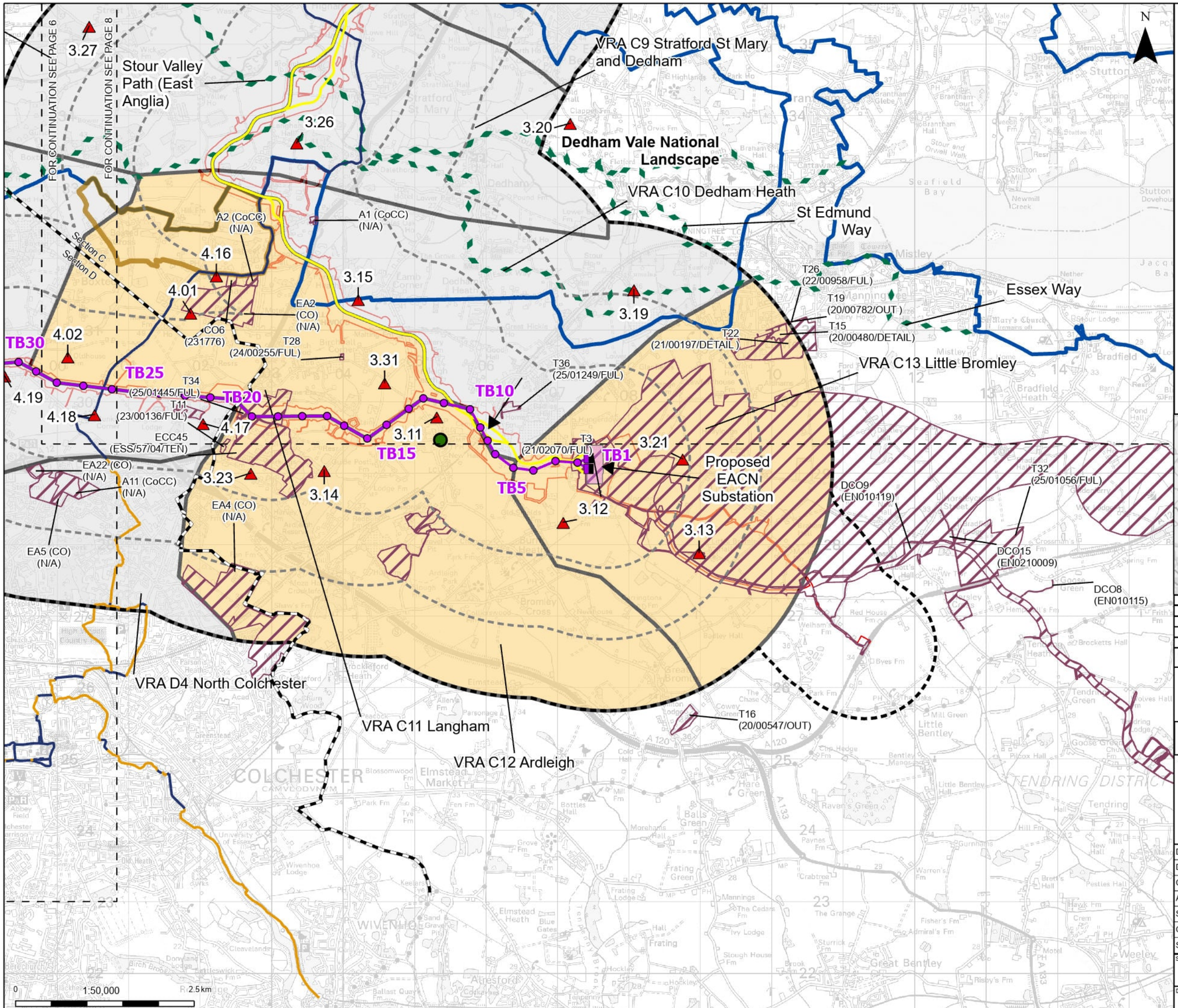
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Suitability Description: Accepted as Concept Stage

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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed full line tension gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Proposed underground cable alignment
Proposed DNO Substation
Proposed East Anglia Connection Node (EACN) Substation

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
National landscape
Stour Valley Project Area

ES landscape viewpoints
Additional historic environment viewpoints
Long distance path
Cumulative developments

National cycle networks

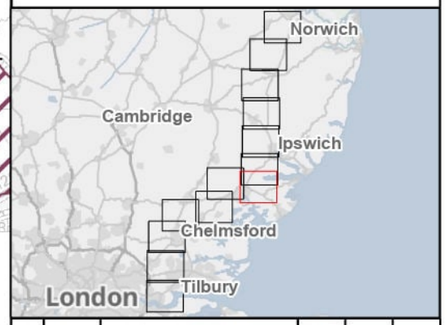
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

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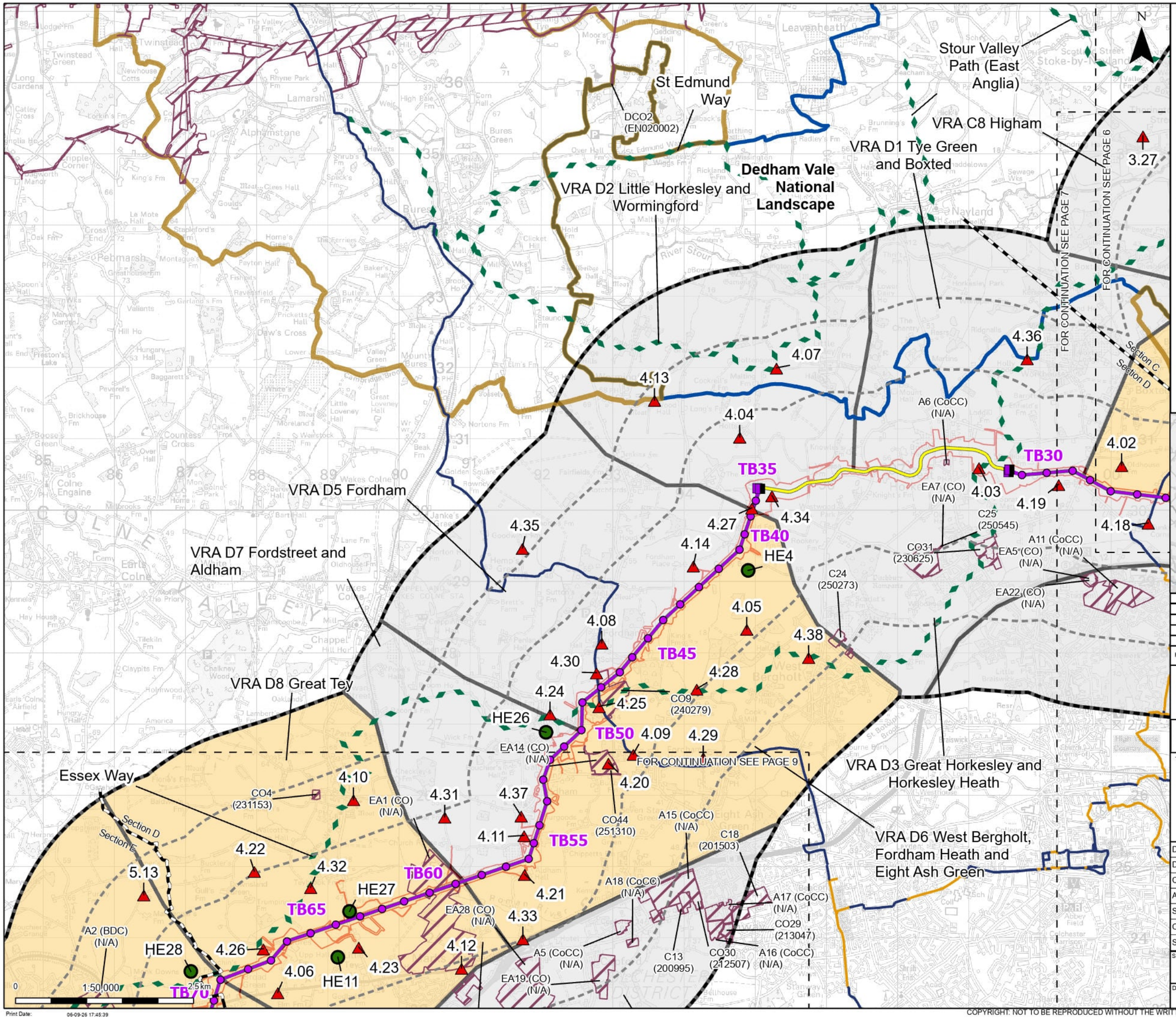
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Page 7 of 13

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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed full line tension gantry
Proposed standard lattice pylon location
Proposed overhead line alignment
Proposed underground cable alignment
Proposed cable sealing end compound (CSEC)

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
National landscape
Stour Valley Project Area
ES landscape viewpoints

Additional historic environment viewpoints
Long distance path
Cumulative developments

National cycle networks

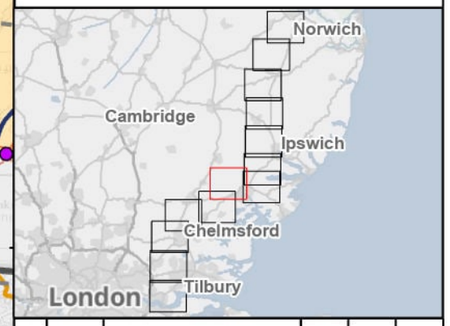
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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Planning Inspectorate App Number: EN020027

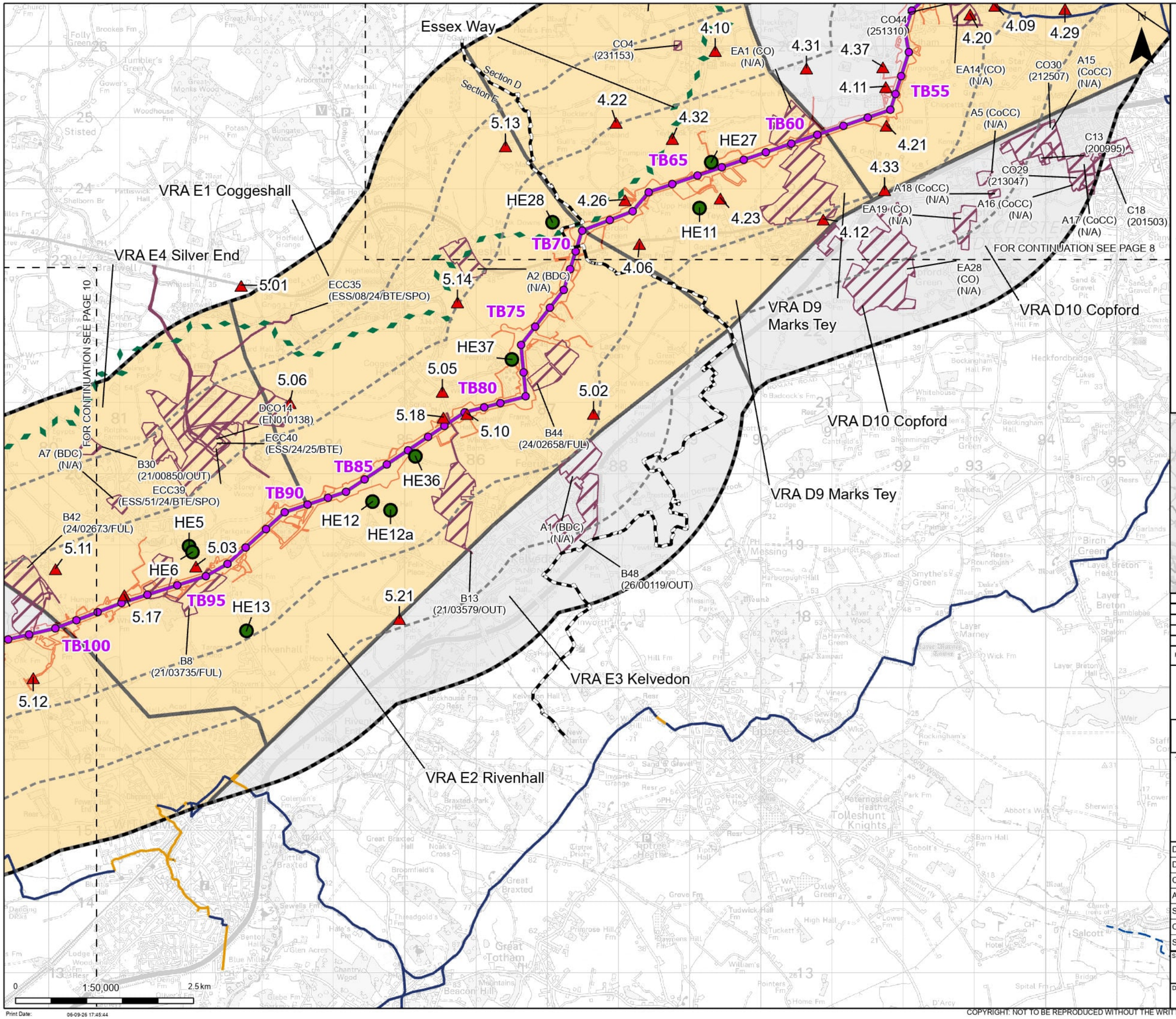
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Page 8 of 13

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Suitability Code:	A2	Project Number:	10059280

Suitability Description: Accepted as Concept Stage

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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed standard lattice pylon location
Proposed overhead line alignment

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
ES landscape viewpoints
Additional historic environment viewpoints
King Charles III england coast path
Long distance path

Cumulative developments

National cycle networks

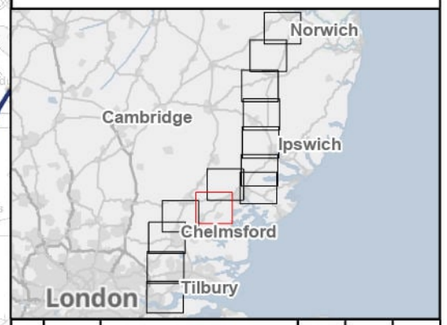
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 9 of 13

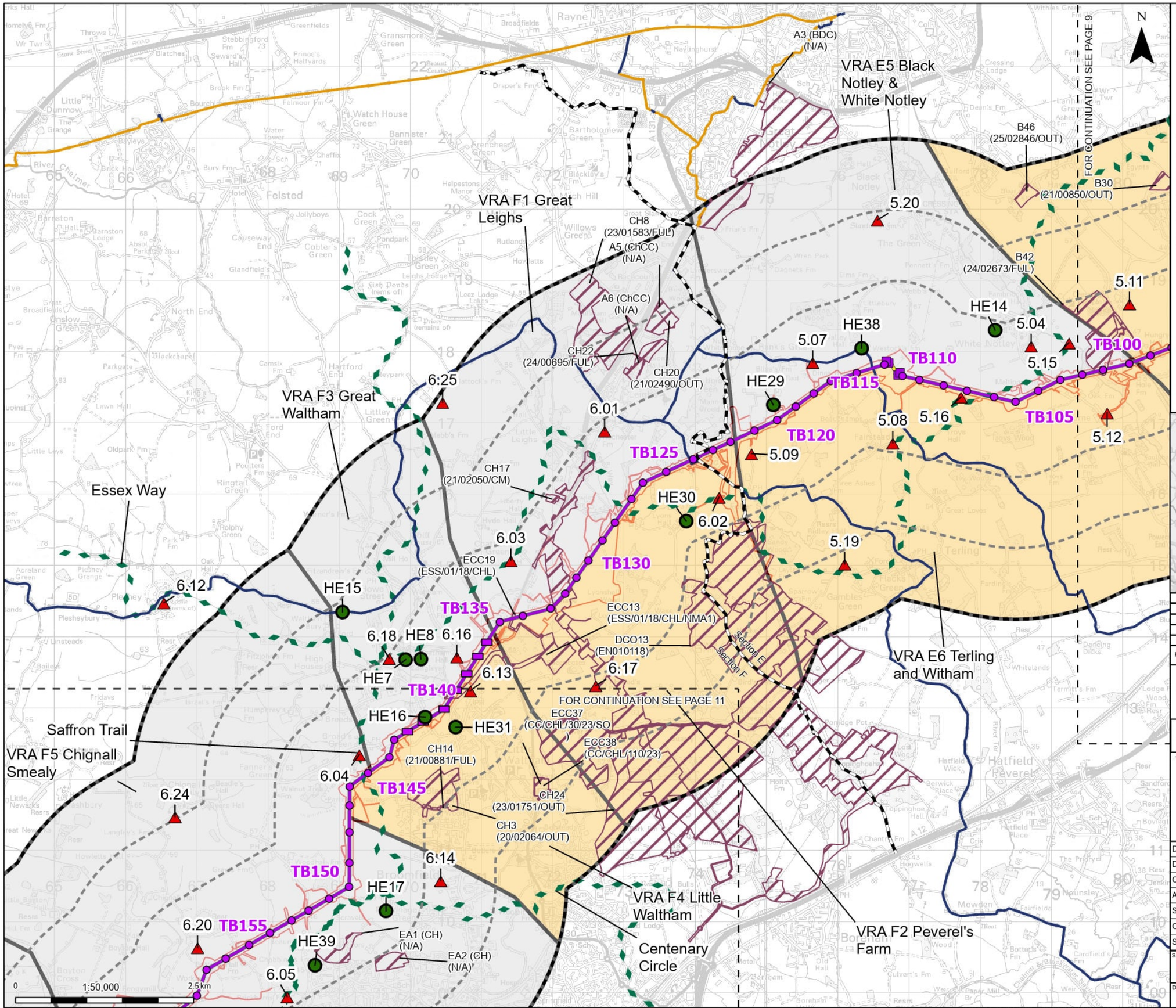
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Suitability Code:	A2	Project Number:	10059280

Suitability Description:
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Drawing Number:
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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 10 of 13

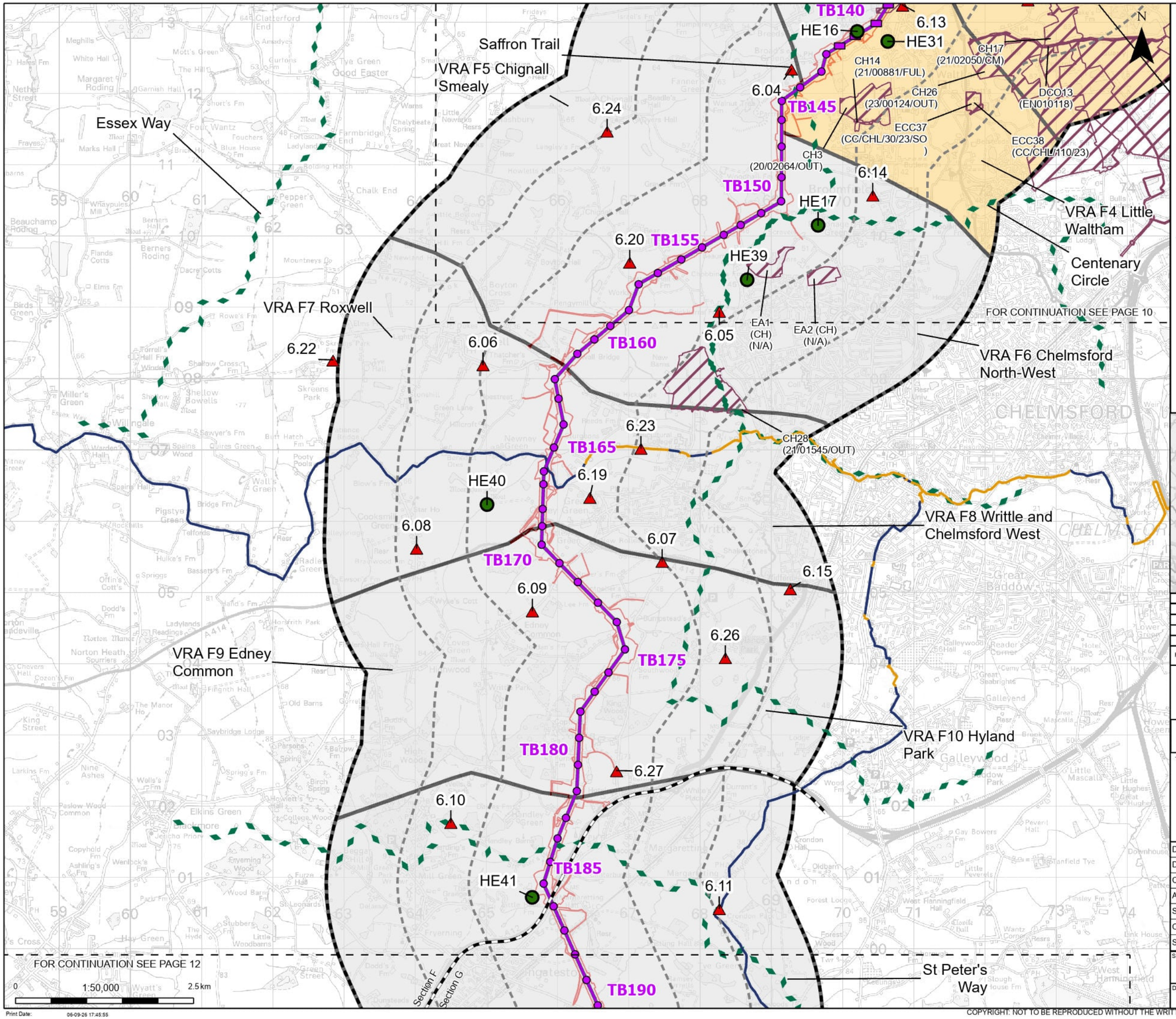
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Norwich to Tilbury

Planning Inspectorate App Number: EN020027

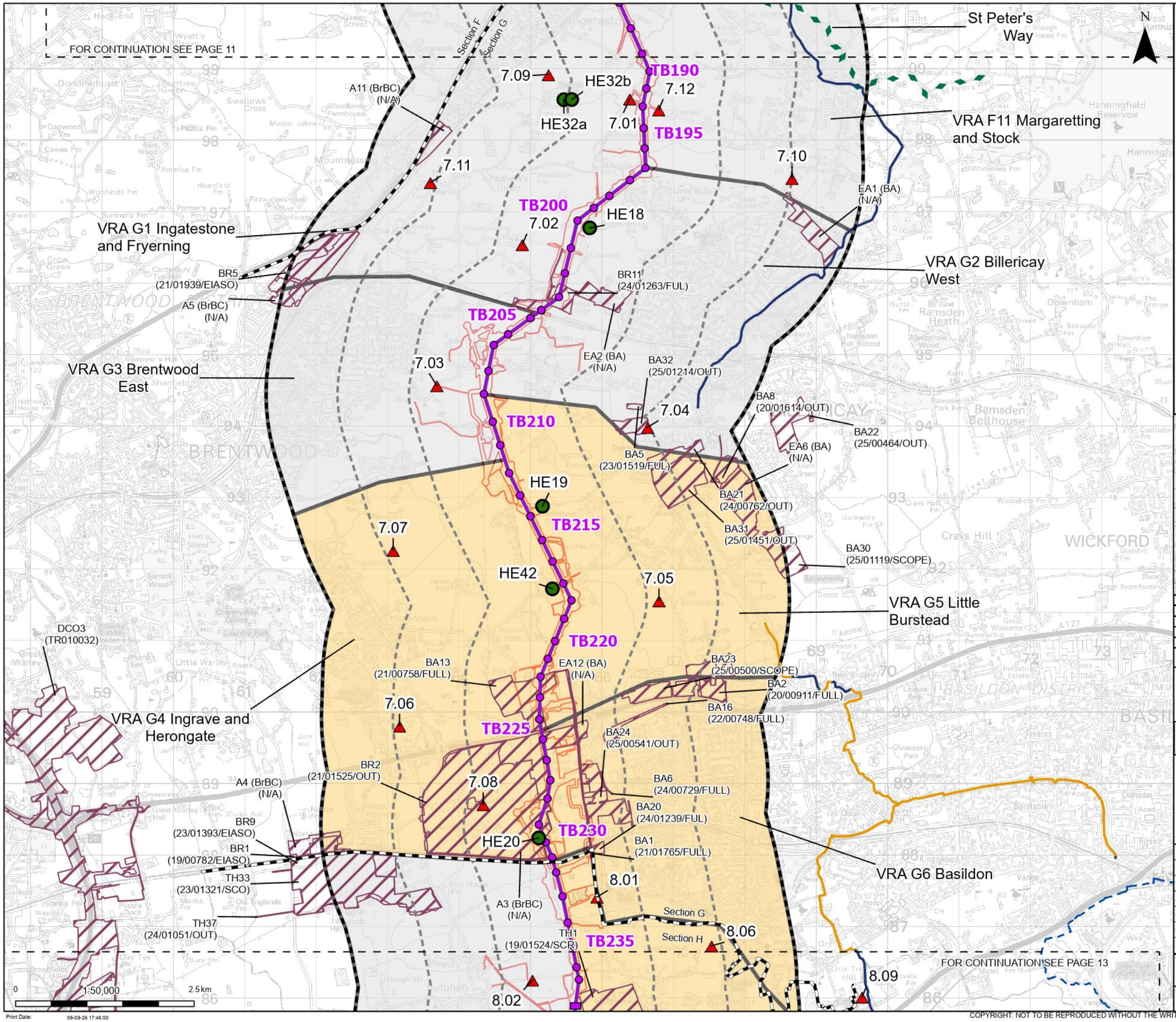
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Page 11 of 13

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Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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Suitability Code:	A2	Project Number:	10059280

Suitability Description:
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Drawing Number: 10059280-ARC-ELS-ZZ-DR-ZZ-00922
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Order limits
Sheet index cutline
Project section line

Proposed project design details

Proposed low height pylon location
Proposed standard lattice pylon location
Proposed overhead line alignment

Discipline specific constraints

1 km buffer
2 km buffer
LVIA Study Area
ES landscape viewpoints
Additional historic environment viewpoints
King Charles III england coast path
Long distance path
Cumulative developments

National cycle networks

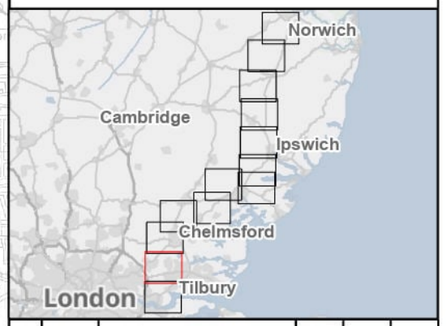
Traffic free national cycle networks
On road national cycle networks

Visual Receptor Area

Significant cumulative effects identified
No significant cumulative effects identified

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F1) and 4.2 (document reference 6.4.F2).

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:

8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas

Designed	J. Ginty	Date	May 26
Drawn	N. Banu	Date	May 26
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Approved	K. Burrows	Date	May 26
Scale:	1:50,000	Datum:	AOD
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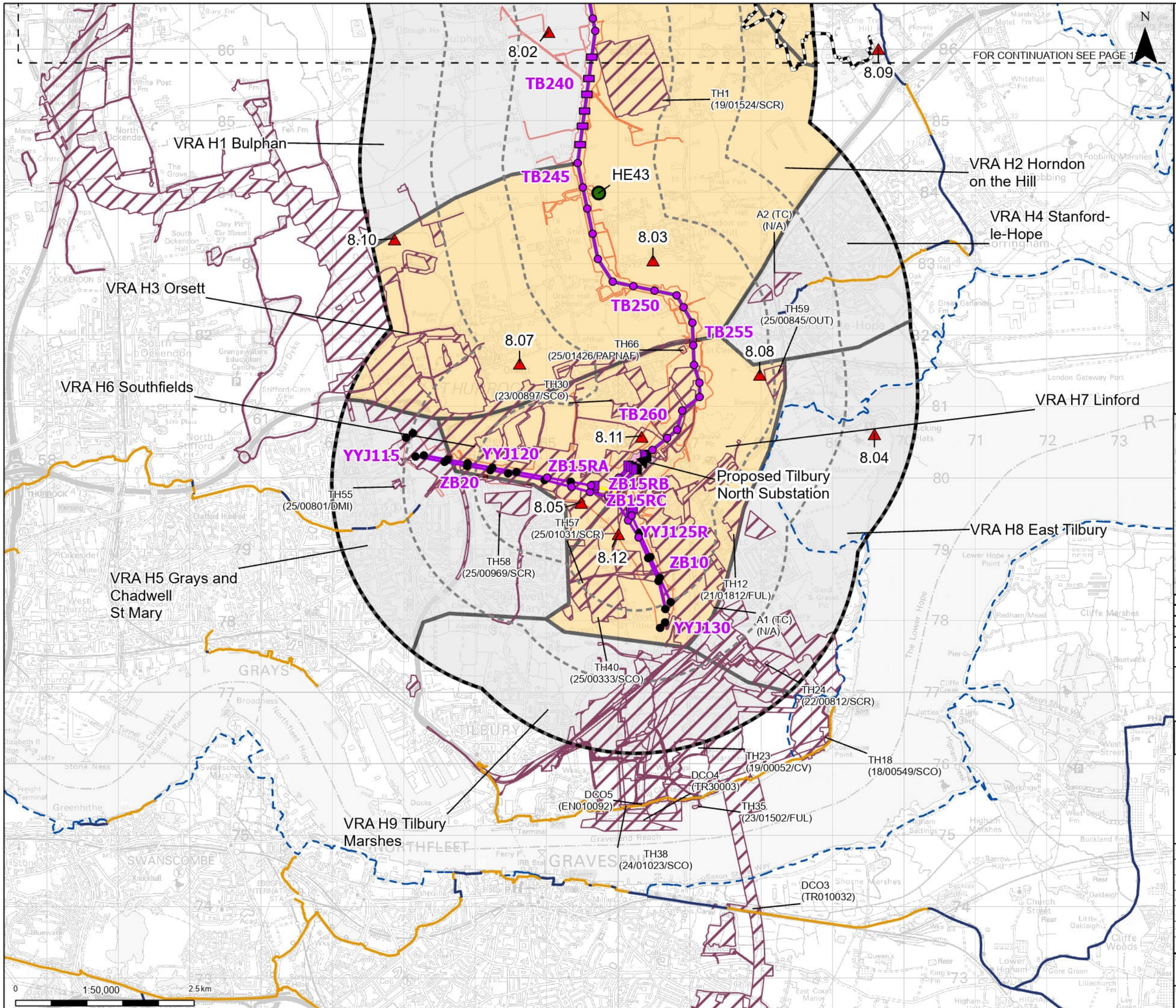
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PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.9.2 Applicant's Responses to Second Written Questions – LV2.8: Cumulative Effects on Visual Receptor Areas
Page 13 of 13

Designed	J. Ginty	Date	May 26
Drawn	N. Banu	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
Scale:	1:50,000	Datum:	AOD
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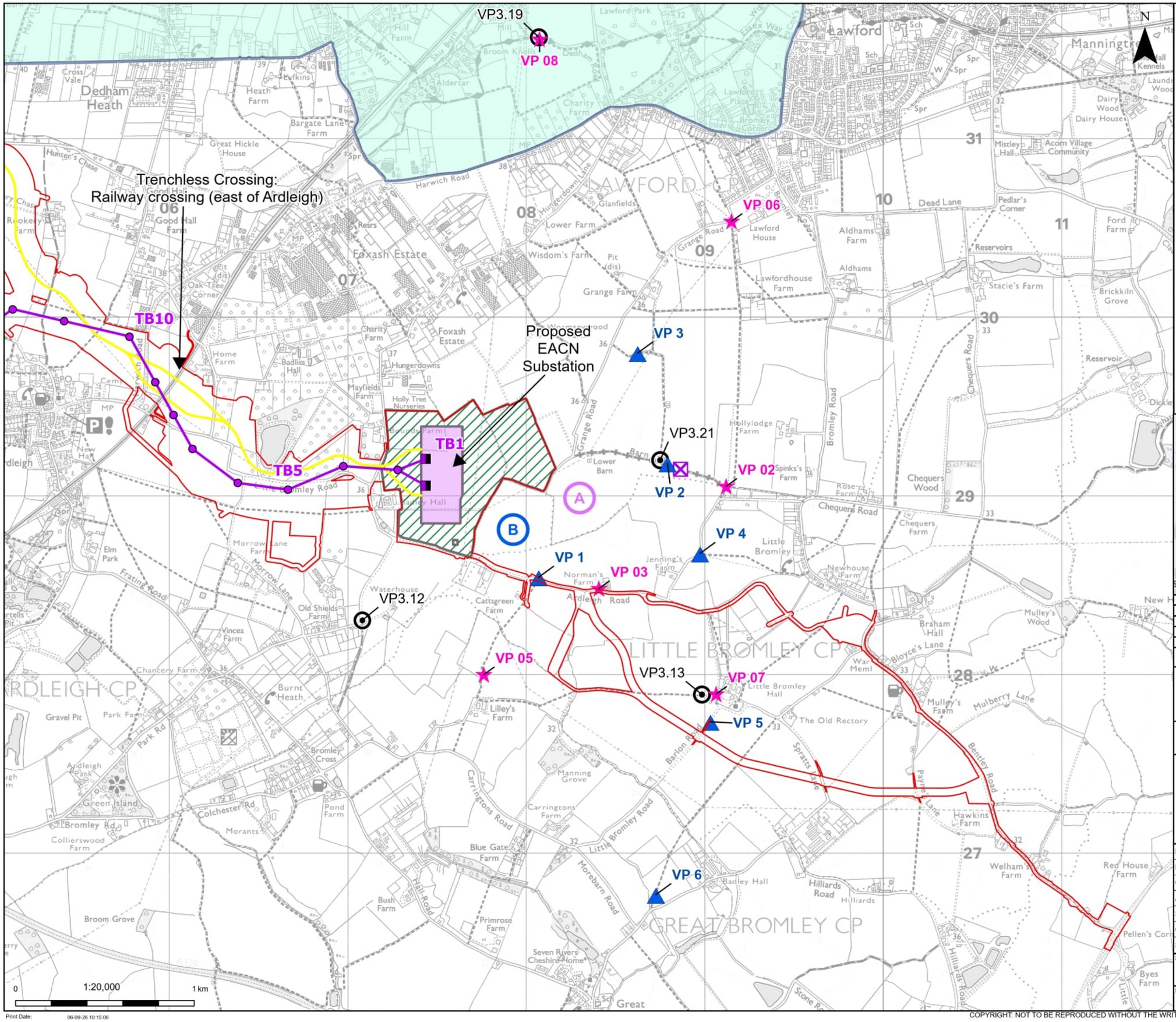
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Appendix F.
LV 2.10

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Appendix F
LV 2.10



Order limits

Proposed project design details

- Proposed full line tension gantry
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Proposed underground cable alignment
- Proposed East Anglia Connection Node (EACN) Substation
- Environmental area

Cumulative Viewpoints included in Norwich to Tilbury, North Falls and Five Estuaries DCO submissions and examinations

- Norwich to Tilbury viewpoint location
- Updated Norwich to Tilbury viewpoint 3.21 location (as submitted at Deadline 5)
- North Falls viewpoint location
- Five Estuaries viewpoint location
- Approximate location of North Falls onshore substation
- Approximate location of Five Estuaries onshore substation
- Dedham Vale National Landscape

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PROJECT: Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title: 8.9.2 Applicant's Responses to Second Written Questions – LV2.10: Cumulative Visualisations – Norwich to Tilbury, North Falls and Five Estuaries

Designed	J. Ginty	Date	May 26
Drawn	S. Sarkar	Date	May 26
Checked	A. Fell	Date	May 26
Approved	K. Burrows	Date	May 26
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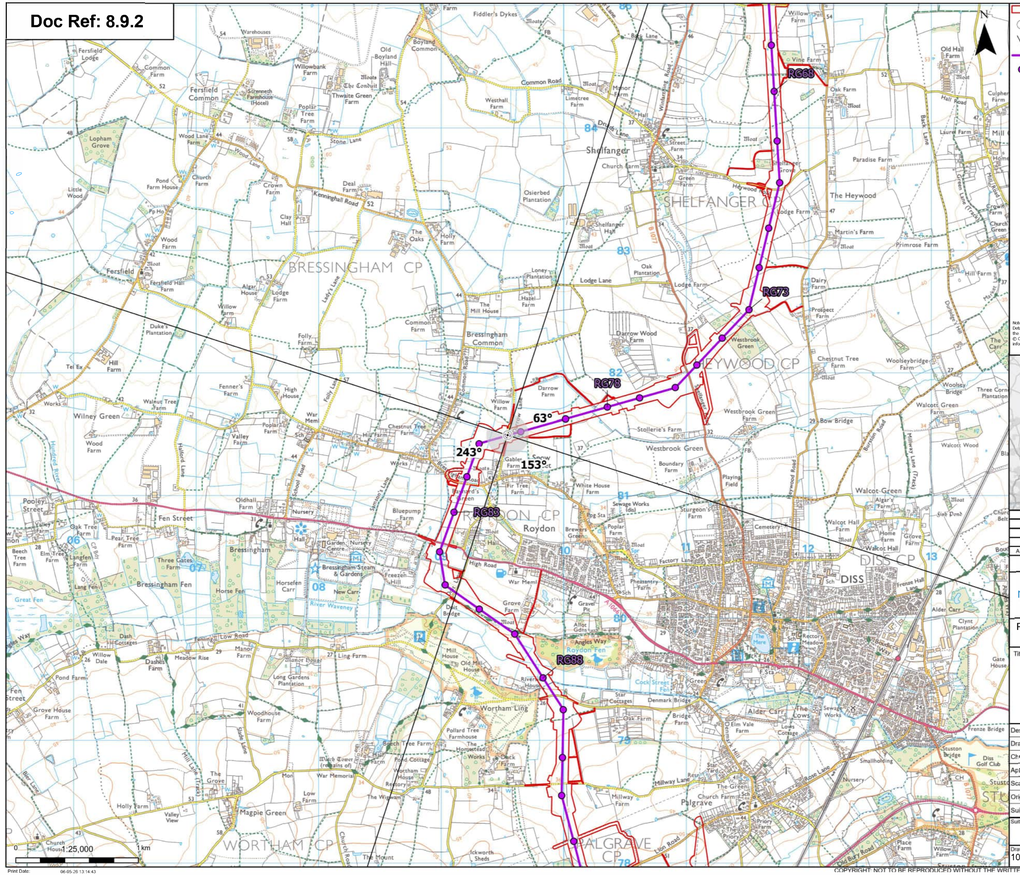
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Appendix G.
LV 2.15

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Appendix G
LV 2.15

Doc Ref: 8.9.2


N
RG98
RG78
RG78
RG98
RG98
63°
243°
153°
BRESSINGHAM CP
SHELFANGER
HEYWOOD CP
ROYDON CP
DISS
WORTHAM CP
PALGRAVE CP
Shelfanger
Roydon
DISS
Palgrave
Bressingham Common
Fersfield Common
Fersfield
Wilney Green
Fen Street
Bressingham Fen
Great Fen
Low Road
Wortham Ling
Magpie Green
Westbrook Green
Walcot Green
Bow Bridge
Mill Road
Lodge Lane
Keepers Lane
Kenninghall Road
Church Lane
Fen Lane
Valley Lane
Hall Lane
Pulham Road
Bressingham Steam & Gardens
Diss Golf Club
Diss Cricket Club
Diss Swimming Pool
Diss Leisure Centre
Diss Station
Diss Railway Station
Diss Bridge
Diss Mere
Diss Park
Diss Museum
Diss Library
Diss Post Office
Diss Police Station
Diss Fire Station
Diss Health Centre
Diss Cemetery
Diss Recreation Ground
Diss Sewage Works
Diss Industrial Estate
Diss Trading Estate
Diss Business Park
Diss Retail Park
Diss Shopping Centre
Diss Town Centre
Diss Town Hall
Diss Town Council
Diss Town Clerk
Diss Town Mayor
Diss Town Crier
Diss Town Band
Diss Town Choir
Diss Town Orchestra
Diss Town Theatre
Diss Town Cinema
Diss Town Museum
Diss Town Library
Diss Town Post Office
Diss Town Police Station
Diss Town Fire Station
Diss Town Health Centre
Diss Town Cemetery
Diss Town Recreation Ground
Diss Town Sewage Works
Diss Town Industrial Estate
Diss Town Trading Estate
Diss Town Business Park
Diss Town Retail Park
Diss Town

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OS reference:	609541E 281494N	Horizontal field of view:	90° (cylindrical projection)	Camera:	NIKON D750	Photography Date:	28/05/2026
AOD:	41.42 m	Principal distance:	522 mm	Lens:	50mm Fixed Focal Length	Photography Time:	12:15
Direction of view:	63°	Paper size:	841 x 297 mm (half A1)	Camera height:	1.5 m		
Nearest pylon:	0.11 km	Correct printed image size:	820 x 260 mm				

Notes:
The image shows the baseline photography - the Project is not shown.

Norwich to Tilbury

Figure: 7.12.F22_VP1.23b
Viewpoint 1.23: Darrow Lane

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OS reference:	609541E 281494N	Horizontal field of view:	90° (cylindrical projection)	Camera:	NIKON D750	Photography Date:	28/05/2026
AOD:	41.42 m	Principal distance:	522 mm	Lens:	50mm Fixed Focal Length	Photography Time:	12:15
Direction of view:	63°	Paper size:	841 x 297 mm (half A1)	Camera height:	1.5 m		
Nearest pylon:	0.11 km	Correct printed image size:	820 x 260 mm				

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Norwich to Tilbury

Figure: 7.12.F22_VP1.23c
Viewpoint 1.23: Darrow Lane

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OS reference:	609541E 281494N	Horizontal field of view:	90° (cylindrical projection)	Camera:	NIKON D750	Photography Date:	28/05/2026
AOD:	41.42 m	Principal distance:	522 mm	Lens:	50mm Fixed Focal Length	Photography Time:	12:15
Direction of view:	243°	Paper size:	841 x 297 mm (half A1)	Camera height:	1.5 m		
Nearest pylon:	0.11 km	Correct printed image size:	820 x 260 mm				

Notes:
The image shows the baseline photography - the Project is not shown.

Norwich to Tilbury

Figure: 7.12.F22_VP1.23d
Viewpoint 1.23: Darrow Lane

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OS reference:	609541E 281494N	Horizontal field of view:	90° (cylindrical projection)	Camera:	NIKON D750	Photography Date:	28/05/2026
AOD:	41.42 m	Principal distance:	522 mm	Lens:	50mm Fixed Focal Length	Photography Time:	12:15
Direction of view:	243°	Paper size:	841 x 297 mm (half A1)	Camera height:	1.5 m		
Nearest pylon:	0.11 km	Correct printed image size:	820 x 260 mm				

Norwich to Tilbury

Figure: 7.12.F22_VP1.23e
Viewpoint 1.23: Darrow Lane

Appendix H.
LV 2.19

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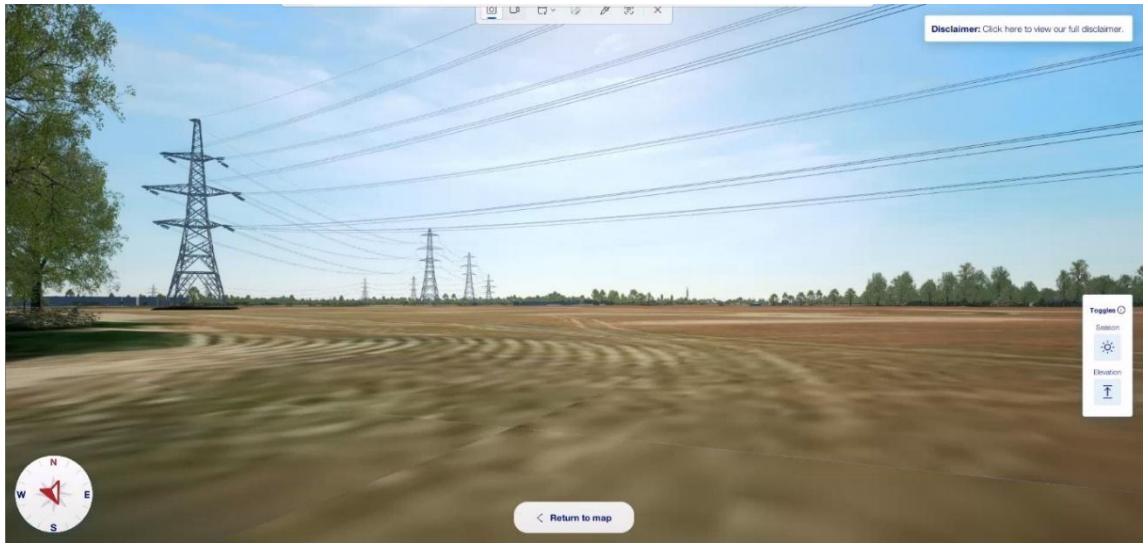
Appendix H
LV 2.19

3D Model image 1 – Paragraph 2.2.1 Images of infrastructure from Viewpoint E (a)

Image from Representation



Image from model

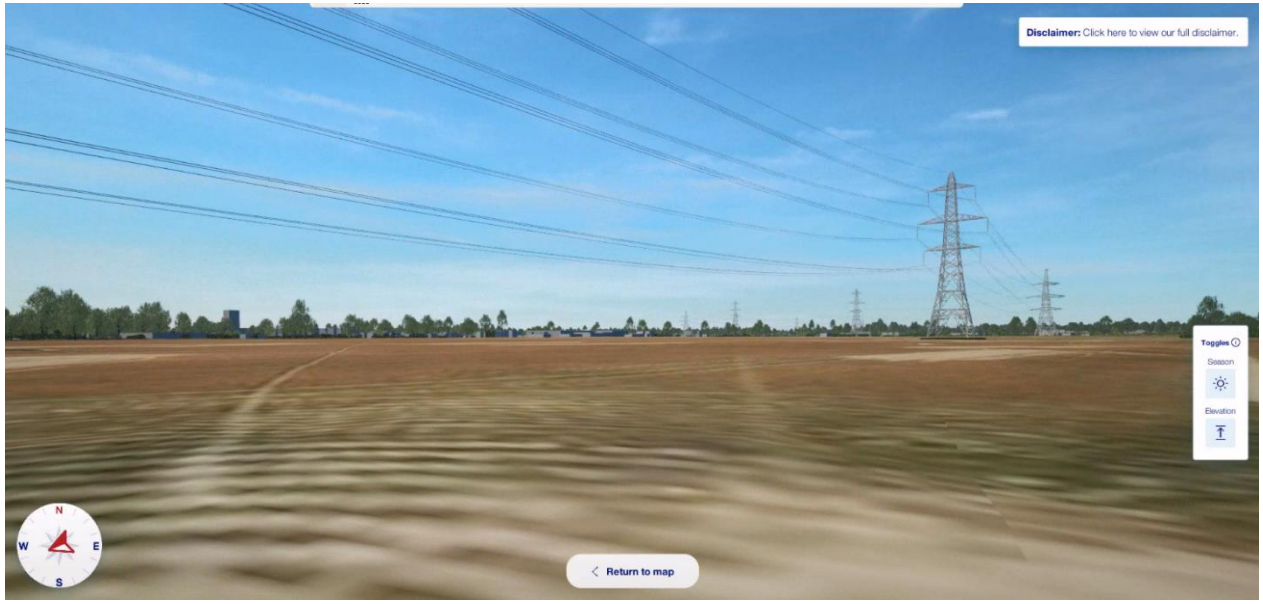


3D Model image 2 – Paragraph 2.2.1 Images of infrastructure from Viewpoint E (b)

Image from Representation



Image from model

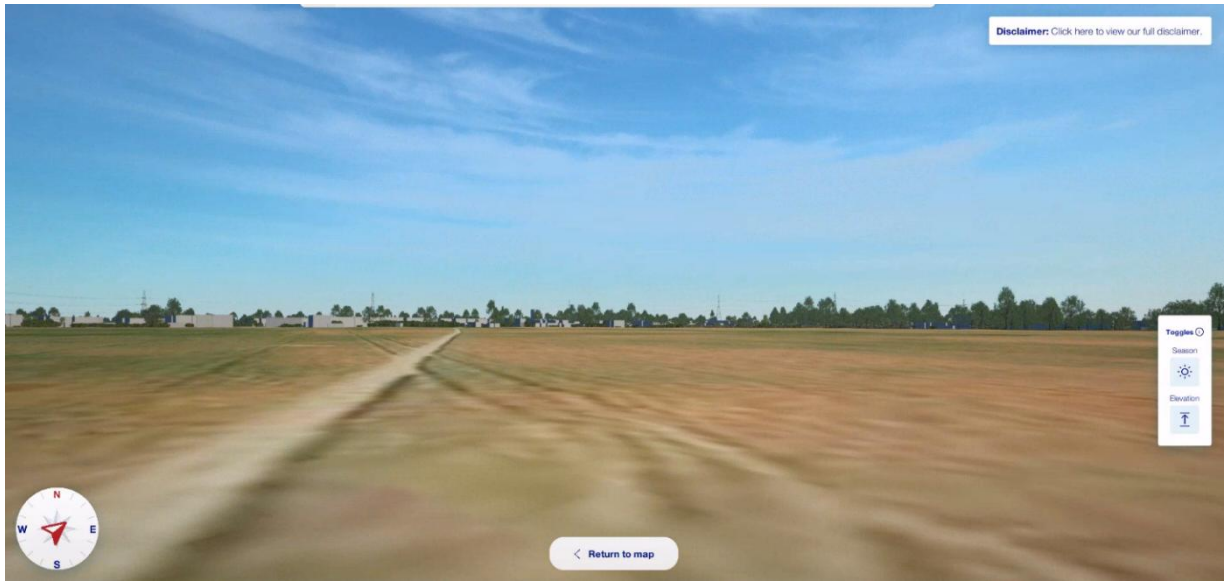


3D Model image 3 – Paragraph 2.2.3 Images of infrastructure from Viewpoint B (a)

Image from Representation



Image from model



3D Model image 4 – Paragraph 2.2.3 Images of infrastructure from Viewpoint B (b)

Image from Representation

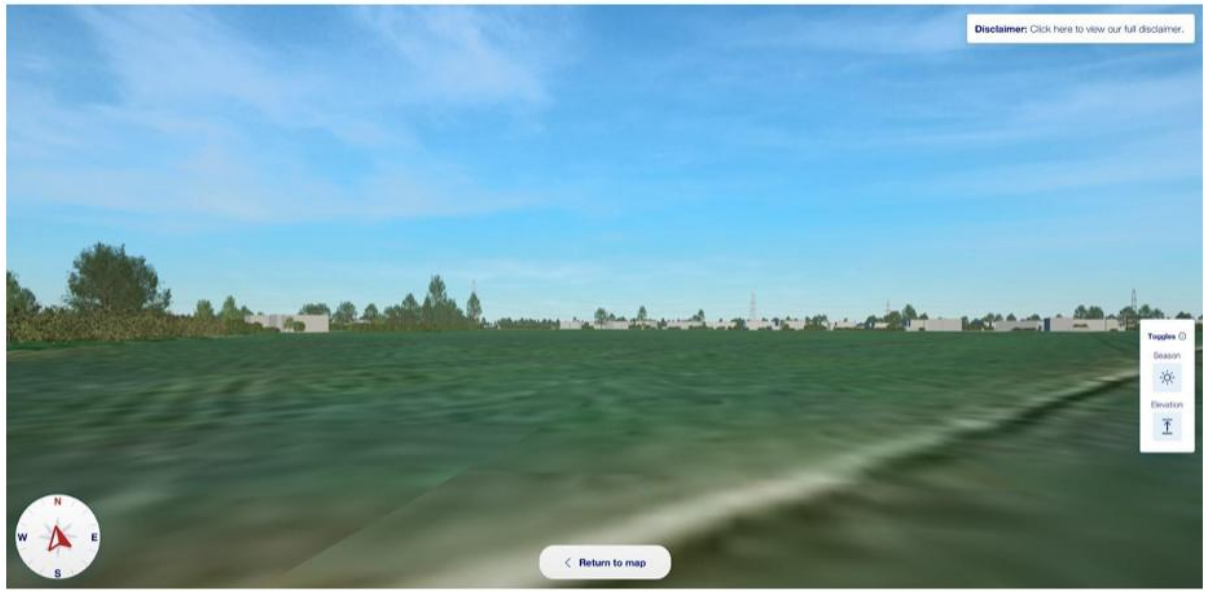


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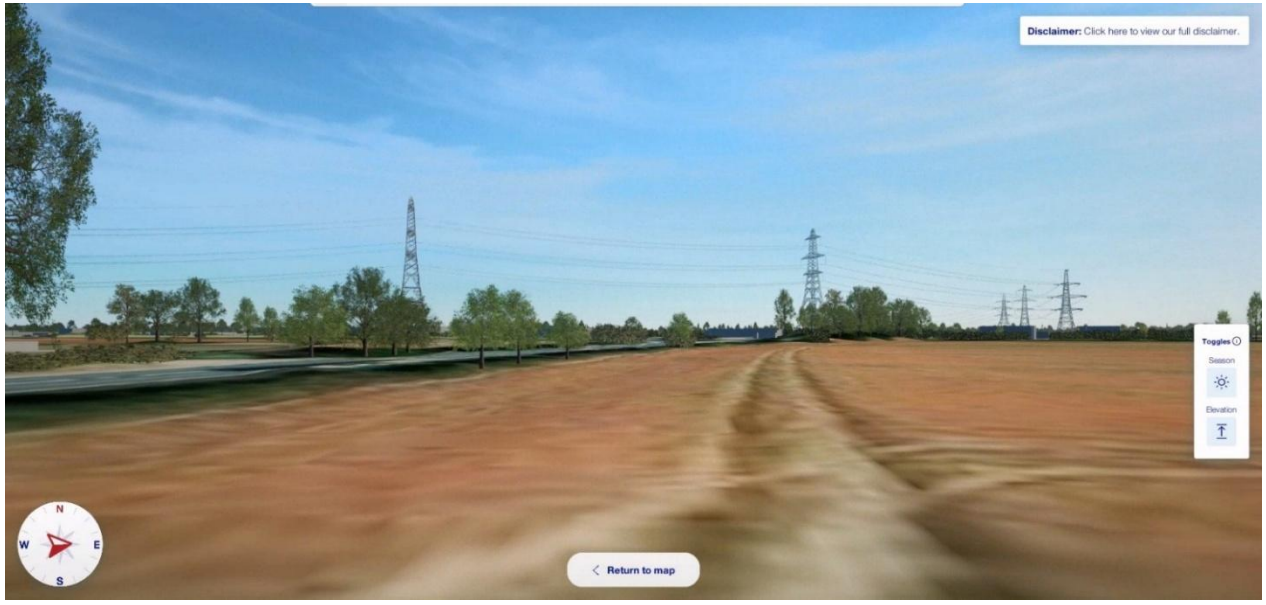


3D Model image 5 – Paragraph 2.2.5 Images of infrastructure from Viewpoint A

Image from Representation



Image from model

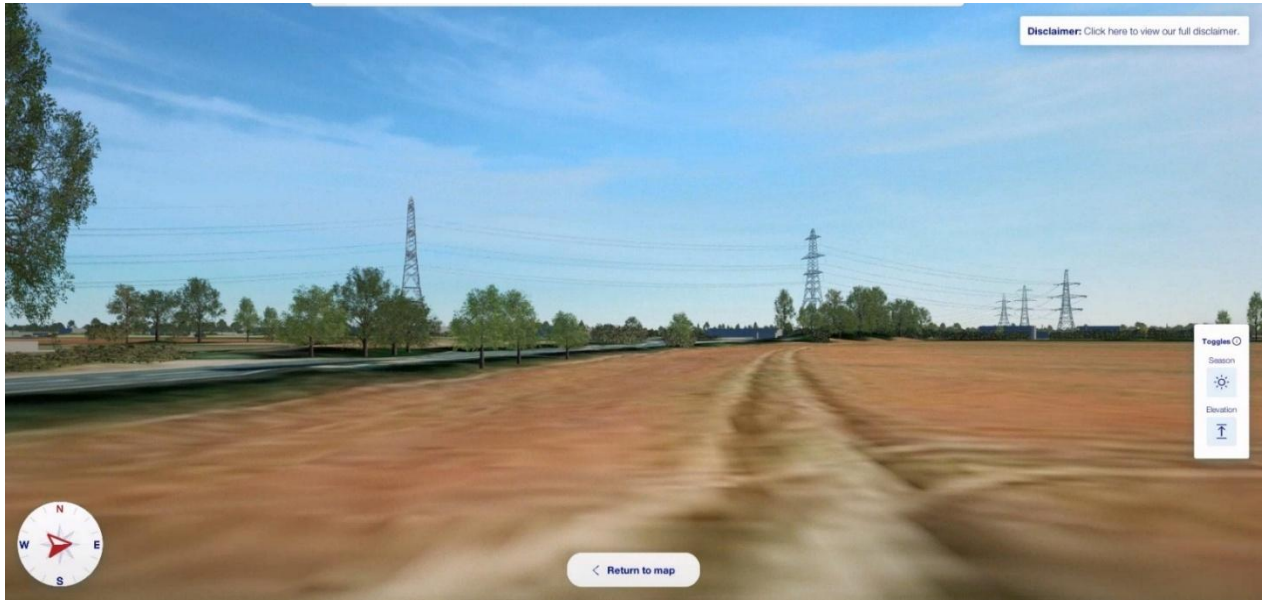


3D Model image 6 – Paragraph 4.2.1 Images of infrastructure from Viewpoint A

Image from Representation



Image from model



3D Model image 7 – Paragraph 5.2.1 Photographs taken of the 3D CAD model […] (Fishing Lake “Local Green Space 1”) (a)

Image from Representation



Image from model

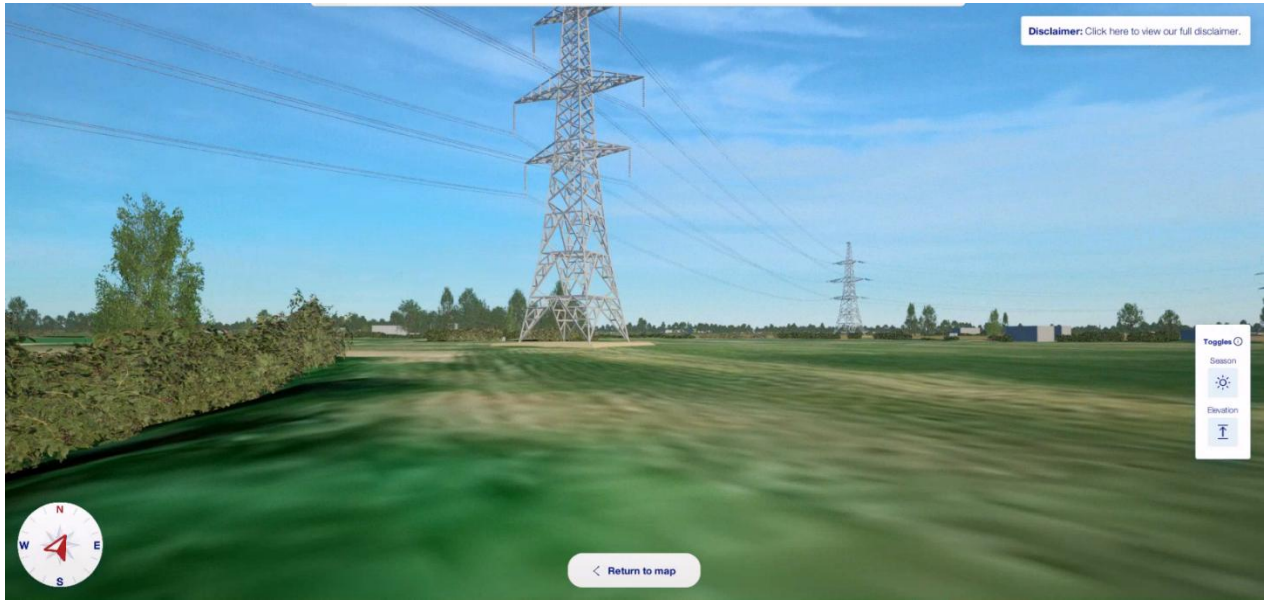


3D Model image 8 - Photographs taken of the 3D CAD model […] (Fishing Lake “Local Green Space 1”) (b)

Image from Representation



Image from model

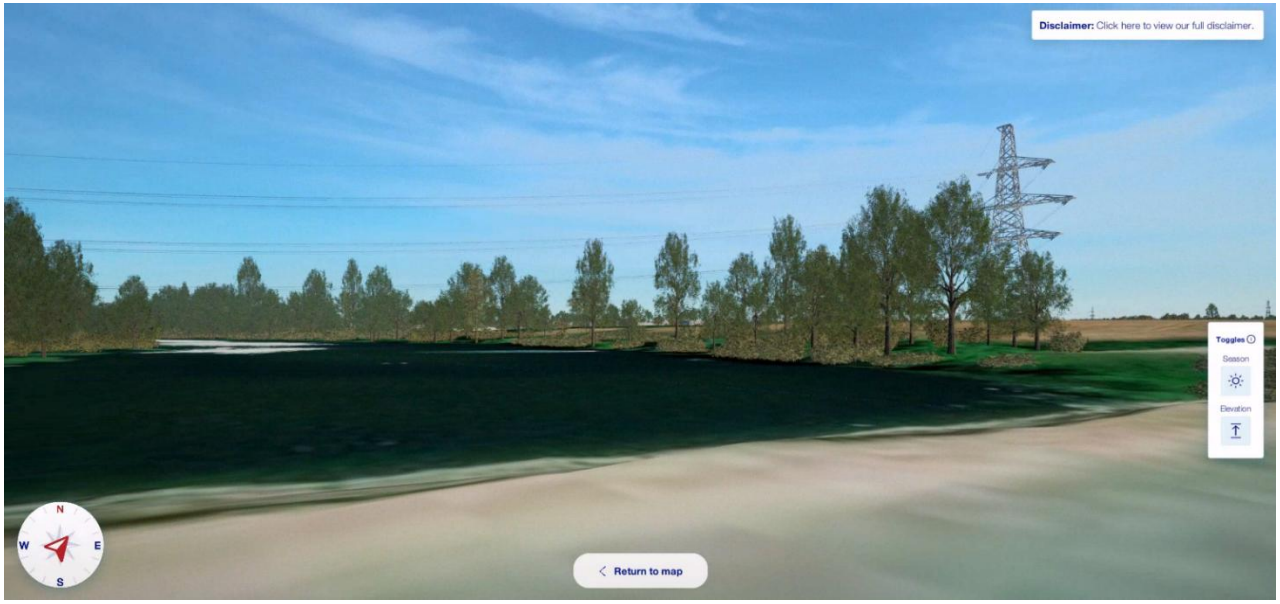


3D Model image 9 - Paragraph 6.2.1 Images of infrastructure from Viewpoint C (a)

Image from Representation



Image from model



3D Model image 10 - Paragraph 6.2.1 Images of infrastructure from Viewpoint C (b)

Image from Representation



Image from model



3D Model image 11 - Paragraph 6.2.2 Photographs taken from Viewpoint C

Image from Representation



Image from model



3D Model image 12 - Views from Coney Byes Farm, rear garden, across valley (a)

Image from Representation

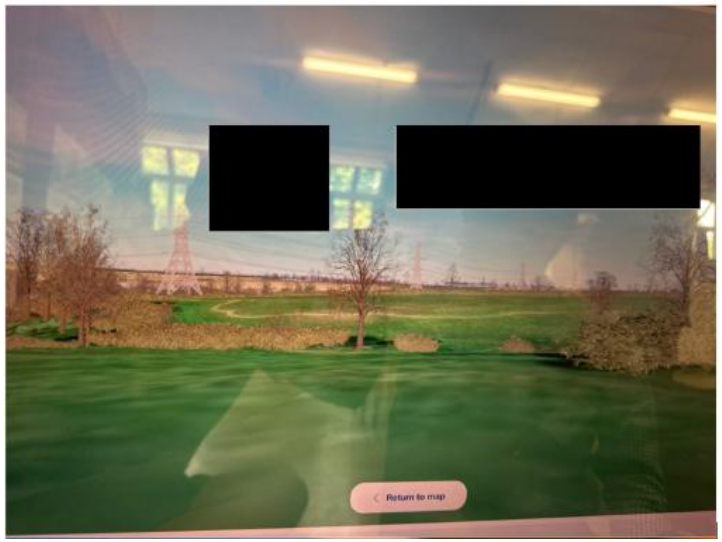
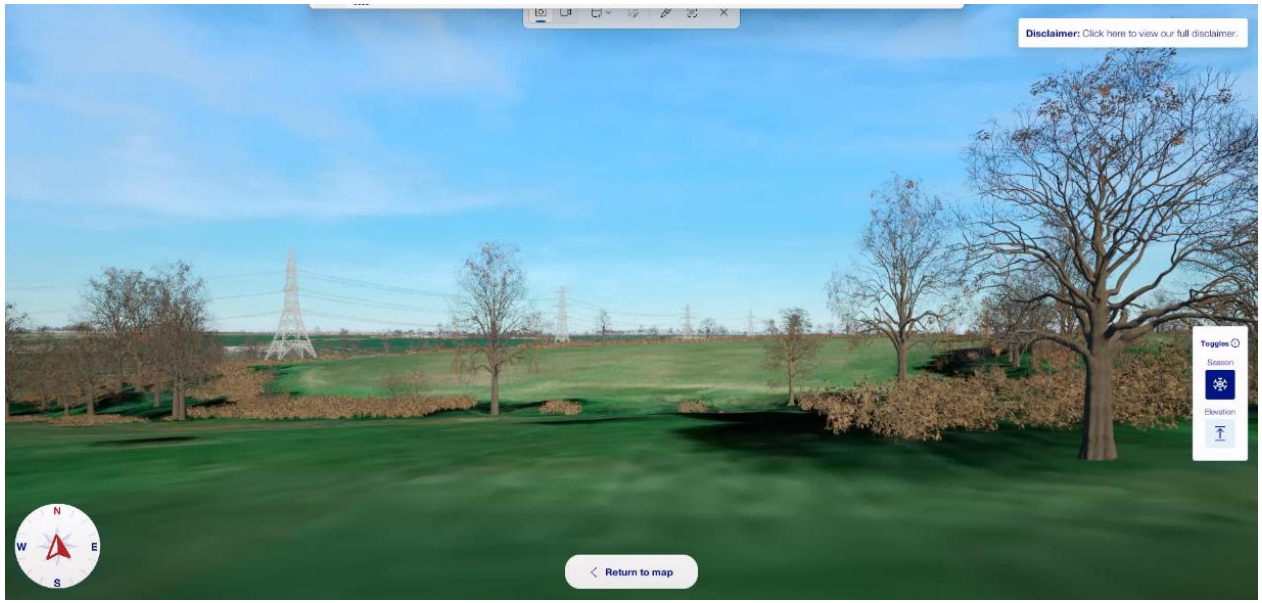


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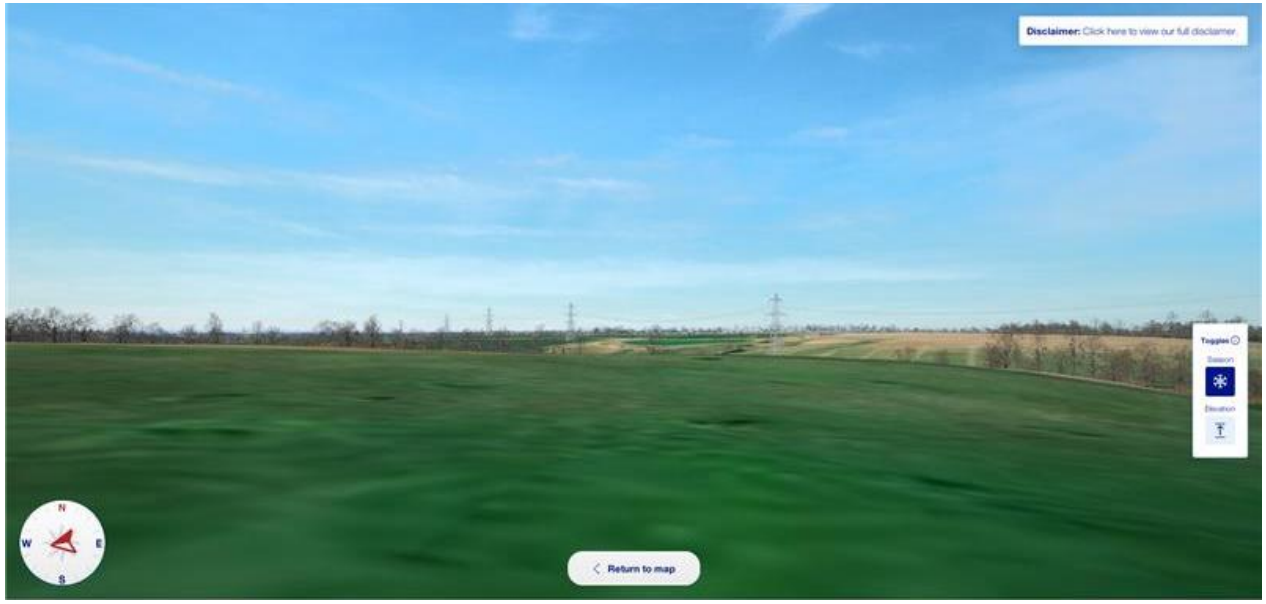


3D Model image 13 - Views from Coney Byes Farm, rear garden, across valley (b)

Image from Representation



Image from model



3D Model image 14 - Highfields Farm, towards Fordham

Image from Representation

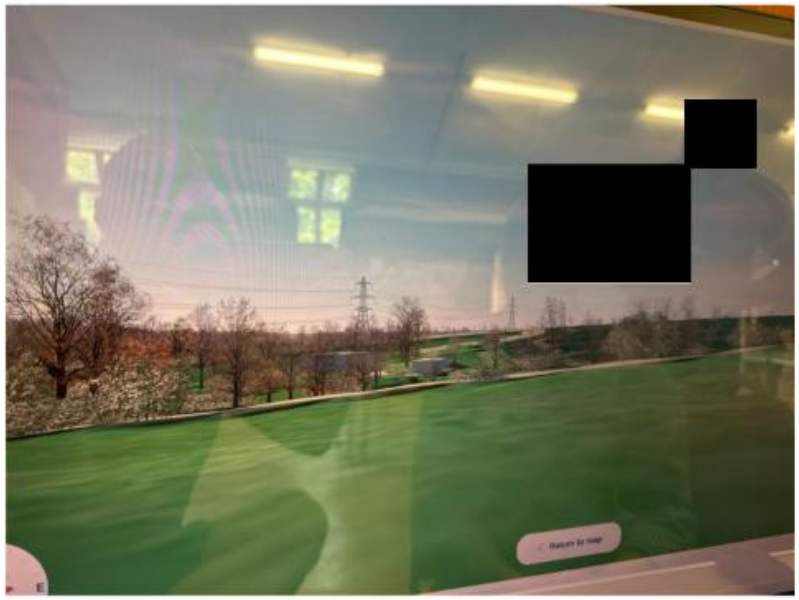


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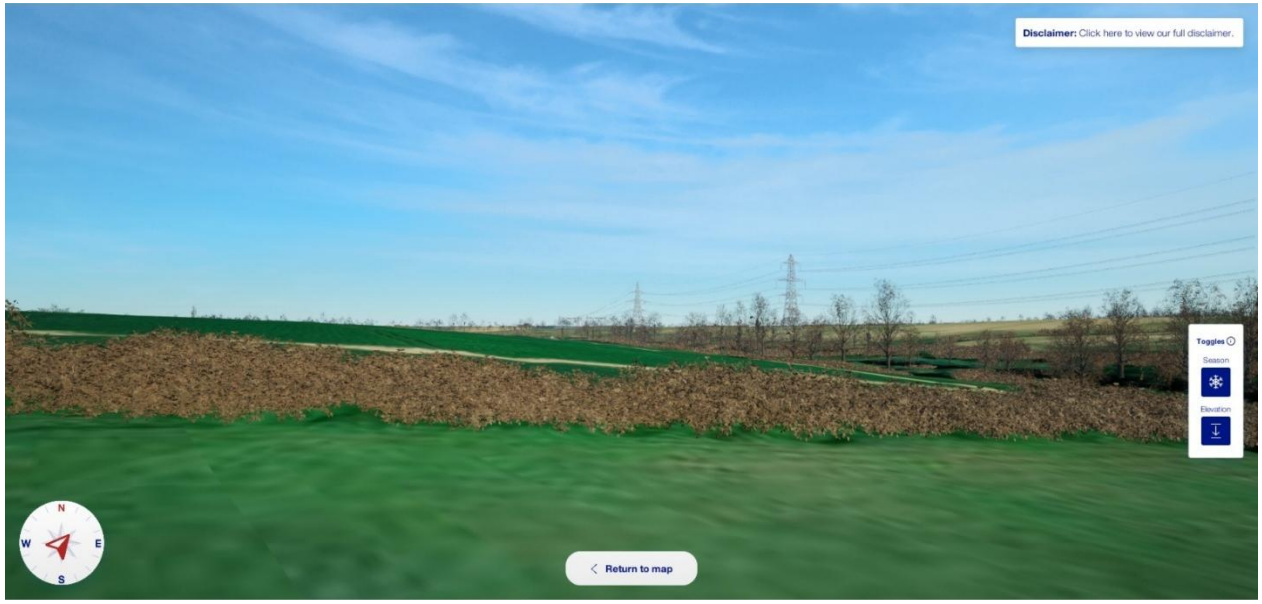


3D Model image 15 - Highfields Farm, towards Dedham Vale

Image from Representation



Image from model

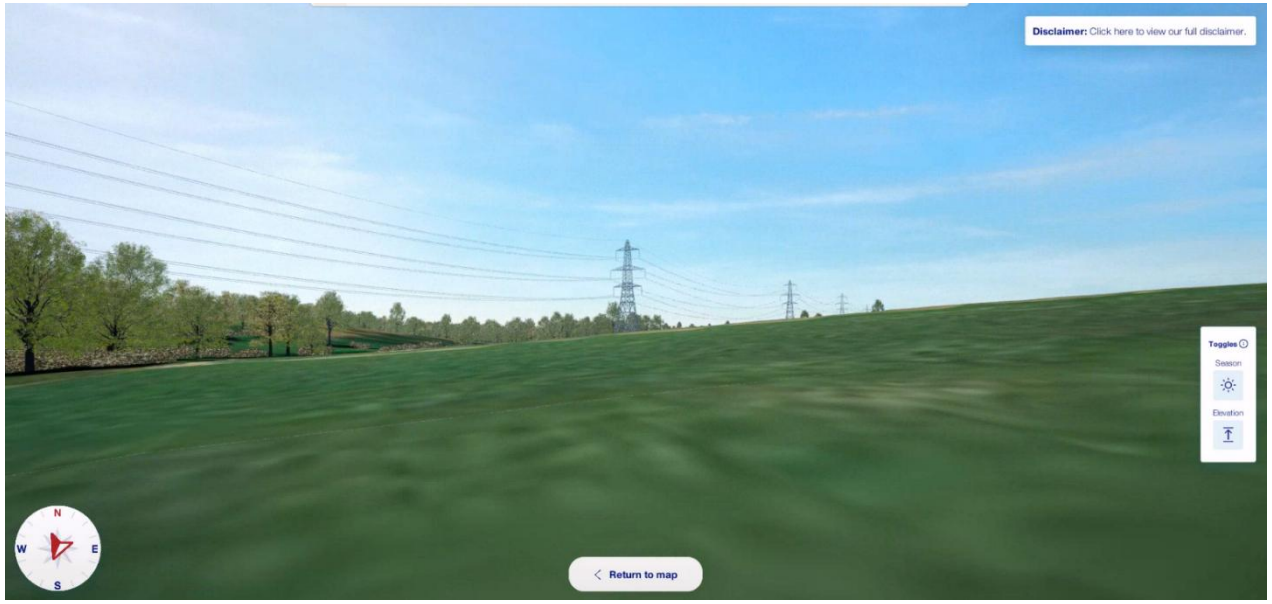


3D Model image 16 - Kings Hall, along valley towards Fordham

Image from Representation



Image from model



3D Model image 17 - Kings Hall, front facing valley road

Image from Representation

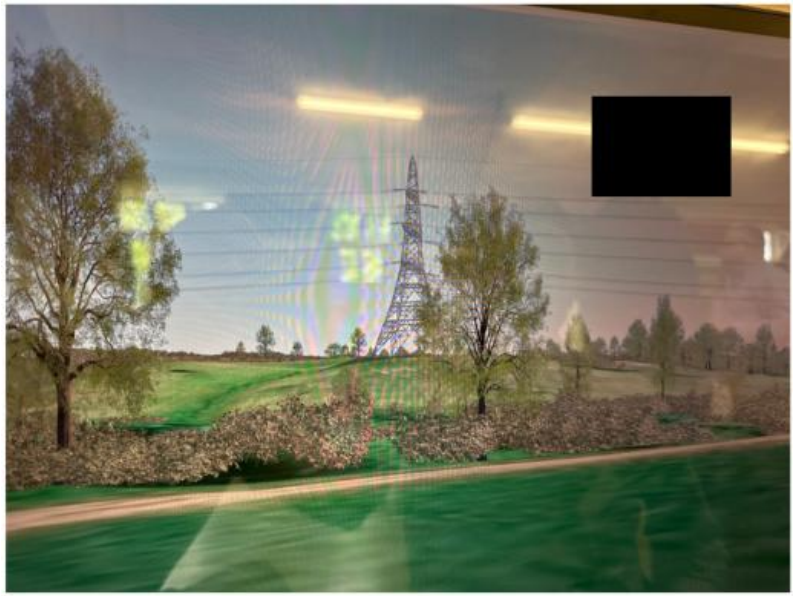


Image from model



3D Model image 18 - Kings Hall, towards Dedham Vale

Image from Representation



Image from model



Appendix I.
TT 2.6

Appendix I
TT 2.6

1MC12 - Stage Two - Main Works Civils for C2 and C3 Sectors

Logistics Direction for the Supply Chain

Document Number: MC12-EKF-CL-GDE-C000-700004

Revision	Date	Author	Checked by	Approved by	Revision Details	EKFB Reviewer (EKFB Contractors only)
P01	12 January 2021	P Bedford	C Barton	A Swift	Initial Release	N/A
P02	1 April 2021	P Bedford	C Barton	A Swift	Update	N/A
P03	4 July 2022	P Bedford	C Barton	A Swift	Update	N/A
P04	01 January 2025	P Bedford	A Roe-Wotton	A Renaud	Update	N/A

Stakeholder review required (SRR)	Purpose of SRR
☐ County / District / London Borough Council	☐ Acceptance
☐ LOV	☐ Approval
☐ LUL	☐ No Objection
☐ NRL	☐ Consent
☐ TFL	☐ For Information
☐ Utilities Company	
☐ Other (please specify)	

Title: Logistics Direction for the Supply Chain

Version Change Information

Date	Version No.	Summary of Changes
01 October 2024	P04	Document refresh and simplification. New processes introduced to manage non-compliance and to incorporate changes in EKFB processes.

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Title: Logistics Direction for the Supply Chain

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1 Introduction

The movement of vehicles to and from EKFB sites is governed by regulations set out in the High-Speed Rail (London to West Midlands) Act 2017. These regulations are legally binding and integrated into EKFB's contracts with its supply chain. Failure to adhere to these may have safety, contractual, financial and/or legal repercussions.

2 Scope

This document outlines the minimum requirements for all road vehicles above 3,500kgs supporting EKFB works. Road vehicles weighing 3,500kgs and under are covered in *EKFB Requirements for Vehicles Weighing 3,500kgs or under.*

This document only provides high-level information on the movement of Abnormal Indivisible Loads (AIL). Additional requirements are available via the EKFB Operational Support Control Room (OSCR).

3 Terms / Acronyms & Definitions

Term / Acronym	Definition
AIL	Abnormal Indivisible Load
BMS	Business Management System
DfT	Department for Transport
ESDAL	Electronic Service Delivery for Abnormal Loads
EKFB	Eiffage Kier Ferrovial Bam
HGV	Heavy Goods Vehicle (Road Vehicle >3,500kgs)
OSCR	Operational Support Control Room
PTO	Power Take Off
RTMP	Routewide Traffic Management Plan
ULEV	Ultra Low Emission Vehicle
VIN	Vehicle Identification Number
VMBS	Vehicle Management Booking System
VRM	Vehicle Registration Mark
VRU	Vulnerable Road User
WRRR	Work Related Road Risk

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4 Supply Chain Requirements

This section outlines the rules all members of the EKFB supply chain must follow when travelling to and from site in a road vehicle >3,500kgs. The rules to support the project are set out in multiple documents produced by HS2 and the UK Government. EKFB have consolidated these rules to assist in compliance. Rules summary sheets can be found in Appendix A and Appendix B.

4.1 Five Rules for Supply Chain Management Staff booking HGVs to EKFB Sites

Rule Short	Rule Full
Correct Booking	Ensure that the vehicle and driver are correctly booked onto the EKFB Vehicle Management Booking System (VMBS).
HGV Standards	Ensure the vehicle meets the minimum HS2 environmental and safety standards.
Staff Training	Ensure the driver and booking staff are correctly trained.
Driver Briefing	Ensure the driver is correctly briefed before travelling to an EKFB site.
Communication	Ensure any issues are communicated to the Operational Support Control Room (OSCR) as soon as they are known.

4.2 Nine Rules for HGVs and their Drivers visiting EKFB Sites

Rule Short	Rule Full
VMBS Driver App	Drivers must correctly use the VMBS Drivers Application.
Correct Route	Drivers must only use the assigned approved route to an EKFB site.
HS2 Identification	Drivers must have the HS2 ID clearly on display.
HGV Standards	The vehicle must meet the minimum safety and environmental standards.
Arrival Time	HGVs must not arrive at site between 8am and 9am if they do not have a booking slot between 8am and 9am.
Site Opening Hours	Drivers must not arrive to site when it is closed.
Queuing	Drivers must not arrive to site in convoy, park near site, or queue at the access point.
Booking	Drivers must ensure they have a valid booking for the site they are attending.
Follow the Rules	Drivers must follow all rules, always be polite and follow all instructions given.

5 Rules Detail

5.1 Correct Booking

To ensure EKFB can correctly manage HGV flow rates and demonstrate compliance to HS2, all bookings must be made correctly. This includes inputting the correct start location, and the correct details for the vehicle and driver. Bookings made on the VMBS with incorrect information could result in a rejection at the gate, and/or the VMBS Driver Application not functioning correctly.

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5.2 HGV Standards

All HGVs travelling to EKFB sites must meet the minimum safety and environmental standards set by HS2 and EKFB. This includes the driver ensuring their load is secure and covered where material is being transported. These standards are outlined in Appendix C.

5.3 Staff Training

All staff supporting the HS2 project must be competent and correctly trained. Drivers will be required to adhere to all HS2 and EKFB minimum standards, and management staff will need to demonstrate their understanding of the requirements, and the use of the VMBS. VMBS training is available from the OSCR.

5.4 Driver Briefing

All HGV drivers must be briefed every day, prior to travelling to / operating on an EKFB site. This is to ensure they are fully aware of HS2 and EKFB expectations, their planned work for the day, the route(s) they must follow and the rules for the site(s) they are working on.

5.5 Communication

Any issues with a delivery to site, including those with the VMBS Driver Application must be communicated to the OSCR prior to the vehicle arriving at site. Issues presented at the gate will not be accepted.

5.6 VMBS Driver Application

HGV drivers must correctly use the VMBS Driver Application from the start of their journey. This ensures EKFB can demonstrate legal and contractual compliance to HS2. Any issues with the VMBS Driver Application must be communicated to the OSCR as soon as they are known. This ensure system issues can be identified at the time they occur, or users can be talked through steps to fix any issues.

5.7 Correct Route

HGV drivers must only use an approved route to site. Some sites have multiple approved roues, however drivers must ensure they use the route they are booked to. A driver may have multiple deliveries to the same site but may be required to use different routes for each delivery. Routes will be available in the VMBS Driver Application.

Drivers must ensure that they only enter site using their designated signed entrance. Under no circumstance are drivers permitted to access or egress site using a crossing point or an unrecognised entrance.

Where a Local Authority or Police diversion is in place, this must be followed, and every effort made to safely return to the designated construction route as soon as possible. Driver packs containing the rules and other site information are available on the EKFB Business Management System (BMS). Access to the EKFB BMS can be obtained via the EKFB Supply Chain Management Team.

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5.8 HS2 Identification

All vehicles over 3,500kgs travelling to EKFB sites must display an A4 size identifier, stating HS2, inside the cab windscreen in a position that does not obscure the driver's visibility. The identifier must be removed when the vehicle is not on HS2 business.

5.9 Arrival Time

HGV movements must not exceed specified hourly volumes to ensure the project minimises its impact on the local communities. These volumes are at the lowest during the HS2 designated peak hour between 8am and 9am. To ensure EKFB does not exceed its legal limit, HGVs without a booking between 8am and 9am must not arrive during the 8am to 9am peak hour.

5.10 Site Opening Hours

HGVs must not arrive at any site when it is closed. Core working hours are typically from 8am to 6pm on weekdays (excluding bank holidays) and from 8am to 1pm on Saturdays. A period of up to one hour before and up to one hour after normal working hours for the start-up and close-down of activities may be in place at some sites.

5.11 Queuing

HGVs must not arrive to site in convoy, park near site, or queue at the access point. This includes travelling at slow speeds that cause a nuisance or disruption to another road user. A convoy is considered 3 or more HGVs. Drivers and HGVs must also not cause an obstruction at the access point.

5.12 Booking

Drivers must ensure they have a valid booking prior to setting off. This includes ensuring the driver's name and vehicle registration are correct on the VMBS. Confirmation of a valid booking can be checked by the driver using the VMBS Driver Application. A vehicle without a valid booking may be refused entry to site.

5.13 Follow the Rules

For everybody's safety, Drivers must follow all site rules, always be polite and follow all instructions given.

6 Failure to Follow the Rules

These rules are in place everybody's safety, and to ensure compliance with the HS2 Act of Parliament. Failure to follow the rules could have significant consequences to the project.

6.1 Supply Chain Drivers

EKFB have overhauled their HGV driver compliance management processes to help reduce administration and to provide support to supply chain members.

Compliance Failure Investigations (CFIs) will no longer be conducted. Instead, an HGV Driver Performance Report will be issued for any HGV Driver not following the rules. You will be expected to investigate and take appropriate action to ensure issues can be promptly addressed. Evidence may be requested.

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There will be no numerical trigger for action to be taken by EKFB against a driver, but a trend analysis of performance will be used. If a driver shows continuous improvement, no further action will be taken by EKFB. However, if a driver fails to improve or their performance deteriorates, action will be taken by EKFB.

Repeated non-adherence to the rules will trigger warnings and/or being asked to stand you driver down from the project for remedial training and EKFB assessment. If after warnings, remedial training and assessment non-compliance still occurs, your driver will be prohibited from returning to all EKFB sites.

If the supply chain member disagrees with the information in the HGV Driver Performance Report, they can challenge, with evidence, within 7 calendar days of the report being issued. After this time, challenges will not be accepted unless there is an exceptional circumstance.

6.2 Supply Chain Management Team

If a member of the supply chain management staff is observed as continually failing to follow the rules, they will be referred to the EKFB Supply Chain Management Team for further action.

7 Miscellaneous

7.1 Exemptions to Vehicle Standards

Any requests for exemptions to standards set out in Appendix C must be approved by EKFB and HS2. Requests for exemptions must be made via the OSCR and are **requests only** and are not guaranteed to be approved. The request must outline in as much detail as possible why the operator is failing to meet the minimum standard(s), what mitigation is in place to reduce any risk generated, and the plan for future compliance.

8 References

8.1 EKFB and HS2 Documents

Document Title	Document Number
EKFB Driver Works Instructions	Various. Available on EKFB BMS
EKFB Requirements for Vehicles Weighing 3,500kgs or under	OS-GUI-7722
EKFB Vehicle >3,500kg Access Exemption Request Form	OS-PRO-7504-F001
Environmental Minimum Requirements for HS2 Phase One	CS755 02/17
HS2 Phase One Environmental Statement	ES 3.0.0
HS2 Phase One register of Undertakings and Assurances	Version 1.8.16
HS2 Phase One and Two A Route-Wide Traffic Management Plan	HS2-HS2-CL-PLN-000-000002 P04
HS2 Phase One Information Paper D4: Working Hours	D4 Version 1.4
HS2 Phase One Information Paper E30: Vehicle Flow Management and Safety Requirements During Construction	E30 Version 1.1
HS2 Phase One Information Paper E31: Air Quality	E31 Version 1.5
Securing loads on HGVs and Goods Vehicles	Online: Updated 20 July 2023

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Appendix A: Rules Summary Sheet: HGV Driver Rules



Title: Logistics Direction for the Supply Chain

Appendix B: Rules Summary Sheet: HGV Management



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Appendix C: HGV Standards

HGV Minimum Requirements

Ser	Requirement
1.	All vehicle identification numbers (VINs) and vehicle registration marks (VRMs) clean and visible.
2.	Vehicles, trailers, and specialist equipment are in a serviceable and roadworthy condition.
3.	Side under-run protection fitted to both sides of the vehicle.
4.	Before and after use checks conducted on the vehicle, trailer, and any specialist equipment at least once per day when in use and every 7 calendar days when not in use. Evidence must be available when requested.
5.	Class IV, V and VI close-proximity mirrors fitted correctly.
6.	Vehicles and trailers safely loaded and within the legal limits. Covered used where appropriate. Supply Chain documented loading policy to be available if requested.
7.	Blind spot Vulnerable Road User (VRU) warning signage fitted (Side and Rear).
8.	Tyre selection correct for vehicle type and operating conditions.
9.	All camera systems able to digitally record.
10	Onboard technology to enable correct use of the VMBS Driver Application by the driver. **There is no requirement for the driver to engage with the VMBS Driver Application whilst driving.**
11.	Euro VI Diesel, Electric, Hybrid or Ultra Low Emission Vehicle (ULEV) Engine.
12.	Carry a first aid kit and fire extinguisher.
13.	Display A4 HS2 identifier whilst on HS2 business. Sign must be removed when HS2 business is completed.
14.	No non-factory fitted tinted windows.
15.	Minimum 2 mounted independent orange flashing beacons with 360º visibility.
16.	Vehicle has achieved and adheres to a fleet operator quality standard which must address the themes of the FORS standard and is subject to independent auditing.
17.	No alcohol in vehicle.
18.	No pets, children or unauthorised persons in the vehicle.
19.	UK registered vehicle.
20.	Daytime running / side lights on.
21.	High visibility markings at rear.
22.	360º recoding camera system with a forward-facing camera that covers the vehicle's front blind spot.
23.	Dashboards of vehicles are kept clear of trays and unnecessary items that might obscure visibility.
24.	Recording forward facing camera.
25.	Recording operator facing camera.
26.	Vehicle is suitable for the environment in which it is operating.
27.	Traffic Signs Manual: Chapter 8 compliant if accessing Traffic Management.
28.	Correct lighting and markings for the load being carried.
29.	Blind spot mirror or camera.
30.	Reversing alarm.
31.	Movements of Abnormal Indivisible Loads (AIL) must have a valid and accurate Movement Order. These are available via the Electronic Service Delivery for Abnormal Loads (ESDAL) or Abhaulier.
32.	Movements of AILs must be recorded on the EKFB Abnormal Load Register. The EKFB Abnormal Load Register can be accessed via the OSCR.
33.	AIL Movement Orders must be provided to the OSCR prior to movement.
34.	A camera system that monitors the near-side vehicle blind spot.
35.	An audible warning system that alerts other road users of left-turn and reversing maneuvers.
36.	An in-cab display screen to provide the driver with a view of the near-side blind spot.
37.	An in-cab audible warning system to alert the driver of other road users in the near-side blind spot.
38.	Rigid goods vehicles >7,500kgs fitted with a camera system that monitors the rear vehicle blind spot.
39.	Camera system to monitor front and off-side blind spots.
40.	Roll Over Protection Fitted (Tractors only).
41.	EU Stage IV Engine or greater (Tractors only).
42.	External (Green) seatbelt indicator beacon (Tractors only).
43.	Failsafe braking system on trailer (Tractors only).

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44.	Safe and suitable access / egress for the Operator (Tractors only).
45.	All Power Take Off (PTO) drivers adequately guarded (Tractors only).
46.	Slope indicator with angle measurement and audio-visual alarm (Tractors only).
47	Equipment/Plant integrated onto any HGV working on site registered on the EKFB Plant Register. Register accesses via the OSCR.

HGV Driver Minimum Requirements

Ser	Requirement
1.	Have had the appropriate licence for the vehicle they are operating.
2.	Correctly using the VMBS Driver Application from the start of the journey.
3.	Have had the appropriate training on the vehicle they are operating.
4.	Have had annual fitness to drive assessment.
5.	Wearing / have access to the correct PPE.
6.	Have had familiarisation training and a competency assessment on the vehicle they are operating.
7.	Be conversant with their company's Road Safety Strategy.
8.	Have had completed training suitable for the environment in which they are operating.
9.	Be familiar and using the CLOCS Ground Conditions Assessment.
10.	Completed the EKFB Induction and relevant familiarisation if working on site, or HGV is using an Operating Centre on HS2 land.

HGV Operator Minimum Requirements

Ser	Requirement
1.	Operator has achieved and adheres to fleet operator quality standard which must address the themes of the FORS standard and is subject to independent auditing.
2.	HGV booked to site using the VMBS for every trip.
3.	Road Safety Strategy / Policy and supporting procedures in place that commit to managing work-related road risk (WRRR)
4.	Provide and increase the number of vehicles on the highway working on HS2 which minimise ground clearance.
5.	Adopt additional innovation or technology to remove blind spots and prevent underrunning.
6.	Demonstrate how vehicles used on the highway which are to be purchased or leased for use on the project will increasingly be the latest designs available which address driver visibility, particularly lateral visibility, and which minimise the height of the driver seat above road level
7.	Consider changes in related technology, and reasonably require adoption of new technology during any vehicle fleet renewal programme.
8.	Increase the number of Direct Vision Standard rated vehicles used year on year.

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