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Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.4.11 Applicant's Comments on any Further Information
or Submissions Received by Deadline 4**

Final Issue A

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1. Introduction

1.1 Purpose of this Document

- 1.1.1 A number of additional submissions were accepted into the examination at Deadline 4. The Applicant has reviewed these documents and provided a response where content is directed to the Applicant and the Applicant considers it would be useful for the purposes of the examination to address a new point, provide a correction, or signpost to information provided elsewhere in the Applicant's documents that provides a response. In some cases, this is a cross reference to a response previously provided by the Applicant where this addresses the point made. The responses are presented in numerical order based on the Examination Library reference number.
- 1.1.2 The Applicant has responded to one Deadline 4 representation separately, due to its length and its overlap with two of the Examining Authority's (ExA's) second written questions (ExQ2), in **8.4.11.1 Applicant Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2 [Revision A]**.
- 1.1.3 At Deadline 4, submissions were also made in respect of the hearings held in the week commencing 27 April 2026, comprising written summaries of oral submissions made at the hearings and responses to hearing action points issued at the hearings. In addition, some written submissions were made that comment on the Applicant's responses to the ExA's first written questions (ExQ1) at Deadline 3.
- 1.1.4 The Applicant has responded to post-hearing submissions separately in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]**.
- 1.1.5 The Applicant has responded to submissions relating to ExQ1 in **8.4.13 Applicant's Response to Comments on its ExQ1 Responses [Revision A]** and **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [Revision A]**.
- 1.1.6 In some instances, Interested Parties provided different types of written submissions within one document. Where this is the case, the Applicant has divided the submission into the relevant Deadline 5 document and has responded as appropriate. Where there is duplication between aspects of submissions, the Applicant has sought to respond once and provide a signpost to that response in the other documents.

2. Applicant's Comments on Deadline 4 Submissions

2.1.1 The Applicant's response to general submissions made at Deadline 4 by Interested Parties is provided in Table 2.1.

Table 2.1 Applicant's comments on matters raised by Interested Parties at Deadline 4

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-320	Babergh and Mid Suffolk District Council	<p>Comments on oCoCP (REP3-025) and oLEMP (REP3 030):</p> <p>Comments regarding the construction phase mitigation/compensation for roosting bats and habitat reinstatement methods have been made elsewhere and are relevant to the oCoCP (e.g. Commitment Reference B10) and oLEMP (e.g. Section 6.1 Protected Species Mitigation – Bats).</p>	<p>The Applicant is awaiting confirmation of agreement from Babergh and Mid Suffolk District Council on potential bat roost resource compensation measures and this matter remains under discussion, as detailed within 5.9.6 Draft Statement of Common Ground - Babergh and Mid Suffolk District Council [Revision D].</p>
REP4-320	Babergh and Mid Suffolk District Council	<p>If there is agreement for the creation of (and remit for) a Norwich to Tilbury Ecology Working Group, then the CoCP and LEMP should be amended to include it. The CoCP and LEMP seem to be appropriate places to formalise the level of involvement of an EWG.</p>	<p>Section 11.2 of 7.4 Outline Landscape and Ecological Management Plan [Revision E] and Section 7.3 of 7.2 Outline Code of Construction Practice [Revision E] were updated at Deadline 3 and Deadline 4 respectively to include the commitment to the formation of an Ecology Working Group post-consent.</p>
REP4-325	Burstall Parish Council	<p>Burstall PC remains hugely concerned that Resilience was dropped from the agenda of the Issue Specific Hearing. We believe this has allowed NGET to avoid the level of scrutiny required for this serious topic, and resort to insufficient written responses. Our particular points of concern include:</p> <p>a. Firstly, the significant issue of resilience has been changed as an agenda item to 'security' which is a small subsection of the wider Resilience issue. Resilience is far broader than just security, and encompasses the overall physical design, the interaction with all other projects (including EA1 which seems to have been ignored along with the Brunfort BESS), continuity, recovery, redundancy, cyber, IT hardening, ownership and accountability and worst case planning. It also covers all risk analysis, including accidental and non-accidental.</p> <p>b. There appears to be a total lack of understanding of physical resilience and no</p>	<p>The Applicant acknowledges the position of Burstall Parish Council regarding the agenda of ISH2; this is not in the control of the Applicant and is determined by the ExA and therefore the Applicant does not comment. However, the Applicant has provided responses to points raised by Burstall Parish Council on the matter of resilience and security/safety within the following previous submissions:</p> <ul style="list-style-type: none"> • 8.8.1 Applicant's Comments on Written Representations [REP2-029], page 19 to 32; • 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070], page 25 to 40 and page 384; and • 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 220 to 239. <p>The Applicant responds to the points raised by Burstall Parish Council as follows:</p> <p>a. The Applicant does not agree that resilience considerations have been limited to security matters. Resilience has been considered proportionately having regard to the characteristics of the Proposed Development, operational requirements, emergency response arrangements and applicable regulatory and industry standards.</p> <p>b. The Applicant considers that resilience has been appropriately addressed through the design, operation and management of the Proposed Development and does not agree that there is a lack of consideration of physical resilience.</p> <p>c. The Applicant does not agree that assessment has been based solely on "best case" scenarios. The Proposed Development has been assessed in accordance with established regulatory requirements and industry standards applicable to critical electricity infrastructure.</p>

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		<p>evidence of 'planning for the worst, hoping for the best'. Rather 'planning for the best and hoping nothing happens and no-one notices'.</p> <p>c. Specifically, all NGET planning is based on 'best case' scenarios (ie weather outage), with no assessment of any event (accidental or not) other than 'best case'. As such, all statements on recovery ability (Electricity System Restoration Standard) are flawed given they fail to consider all scenarios.</p> <p>d. NGET have failed in their corporate responsibility and duty of care by purposefully avoiding the consideration of a full portfolio of valid risks. We believe an assessment will show risks and impacts are increasing - both accidental due to the size and complexity of the grid, the unwillingness of NGET to consider 'connected projects' that bring increasing complexity/ danger (ie Bruntfort BESS) and the concentration in 'super hubs' such as Bramford, but importantly non-accidental with well documented targeting of energy infrastructure by those that would do us harm.</p> <p>e. There is a growing awareness of the lack of resilience across government. Our fear is that NGET are trying to shoe horn in this project before the resilience question gets asked in full. As such, we request this matter is still dealt with at an Issue Specific Hearing.</p>	<p>d. The Applicant notes that nearby energy infrastructure is promoted by separate developers and subject to its own assessment, operational procedures and regulatory controls. Each operator is responsible for demonstrating appropriate resilience, safety and emergency response arrangements for its own development.</p> <p>e. For the reasons set out above, the Applicant considers that resilience matters have been appropriately considered through the examination process and no additional hearing or assessment is required.</p> <p>As evidenced in the above, the Applicant has addressed matters relating to resilience, safety and emergency responses within previous submissions and remain firmly embedded in the considerations of the design and operation of National Grid Electricity Transmission (NGET) infrastructure.</p> <p>The Applicant does not agree that resilience considerations have been omitted from the examination. The assessment of the Project has been undertaken on a proportionate basis, taking account of the characteristics of the Project, the operational requirements of the Bramford Substation and the applicable regulatory and industry standards governing critical electricity infrastructure.</p> <p>The Applicant notes that the concerns raised by Burstall Parish Council extend beyond security matters and include wider issues of resilience, emergency response, operational continuity and interaction with neighbouring infrastructure operated by third parties. These matters have been considered as part of the assessment of the Proposed Development and through the established regulatory and operational frameworks applicable to the infrastructure concerned.</p> <p>Bramford Substation has operated safely for many years using the existing access arrangements. The Proposed Development does not materially alter those arrangements, significantly increase operational traffic, or introduce a materially different operational risk profile.</p> <p>The Applicant also notes that other nearby infrastructure, including solar, battery storage and offshore wind related developments, are separate schemes promoted by different developers and subject to their own assessment, operational and regulatory requirements.</p> <p>While some infrastructure may utilise shared access routes, each operator is responsible for demonstrating appropriate access, safety and resilience arrangements for its own development.</p> <p>Substations are designed, operated and maintained in accordance with established industry standards and resilience requirements applicable to critical national priority infrastructure. Appropriate emergency response and incident management procedures are developed in consultation with the relevant emergency services and authorities, including arrangements to maintain access to operational infrastructure during both routine and emergency situations.</p> <p>The Applicant therefore considers that resilience matters have been appropriately considered through the examination process and that no additional hearing or assessment is necessary in relation to the Proposed development.</p>
REP4-329	Fordham Parish Council	<p>1. Significance and Valuation of Asset 4081 In my view, Asset 4081 — the Roman hunting lodge at Fordham — has been significantly undervalued by National Grid. The designation of a medium value fails to reflect the true archaeological importance of this site. Of particular note is the discovery of an indoor fountain (piscina), which NG has not mentioned at all in its assessment. This feature is of exceptional rarity: only two such fountains have been found in the UK, and only a handful exist across the rest of Europe. Further significant finds include Roman and</p>	<p>The Applicant notes that these comments were provided at Deadline 3 as Appendix H of Pylons East Anglia's response to ExQ1 including points relating to the valuation of Asset 4081 and the identification of features such as a Saxon child burial, additional burials, and other archaeological elements. A detailed response to these matters is provided in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300].</p> <p>The value of asset (4081) was attributed through the application of 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]. The medium valuation represents the regional importance of the asset based on the available information held by Essex and Colchester Historic Environment Records (HERs), which include links to other published and grey literature reports relating to previous investigations of the asset by the respondent. The Applicant is confident in the valuation based on the available data. More information on the valuation of this asset can be found in 8.9.2 Applicant's Responses to Second Written Questions, HE 2.12, submitted at Deadline 5.</p>

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REP4-329	Fordham Parish Council	<p>Saxon burial grounds. Rural Roman burial grounds are rare; those of high status, evidenced by lead-lined coffins, are rarer still. A third Roman burial remains in situ, with further burials likely. NG has also failed to mention a complete child Saxon burial, nor the subsequent discovery of remains of at least four other individuals. In addition to the bathhouse and what NG describes as an entertainment complex (more accurately characterised as a hunting lodge, given the substantial quantity of deer bone recovered, some bearing arrow damage), the site encompasses Roman and Saxon burial grounds of considerable importance. One find from this site was featured in <i>Britannia</i>, published by the Roman Society — a major academic publication. The site is almost certainly connected to three other Roman sites located approximately half a mile away in Fossetts Lane. NG's proposals would pass through those sites as well.</p> <p>2. Inadequacy of Mitigation Assessment I strongly dispute NG's assessment that the post-mitigation impact is only 'low adverse' and 'minor'. NG's own documentation acknowledges that a portion of the asset would be destroyed entirely, and that the setting would be irrevocably harmed by the proximity of the proposed pylons. Destruction cannot be mitigated. The current setting of the site commands views towards Roman Colchester on the hill — the likely origin point of visitors to the complex in antiquity. A 50-metre-high pylon in this setting would cause permanent and irreversible harm to that historical landscape. This is not a matter capable of mitigation, and it is inappropriate to characterise the residual harm as minor. Pylon TB047, specifically, would be positioned directly above known Roman archaeology situated beneath our southern dig site fence and extending approximately 30 metres beyond it. This area was planned as Phase 4 of the excavation; the dig is currently in Phase 3. I draw the Inspector's attention to the following passage from the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025:</p>	<p>It is unclear as to which Roman sites the respondent is referring to 'in Fossetts Lane', however, the Historic Environment Record (HER) includes records of undated cropmarks to the north (4088) and south (4102) of Fossetts Lane and further north (where the Project crosses a different section of Fossetts Lane), cropmarks of a probable medieval moated site (4104). Geophysical survey has been undertaken within these assets where they intersect with the Order Limits (4102, 4104 and 4088); and archaeological trial trenching will also be undertaken to test the largely negative results of the geophysical survey.</p> <p>The methodology for assessing the potential impact of the Project on the asset is 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 the results are presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The results of the geophysical survey undertaken by the Applicant suggests that there are no archaeological remains, either related to the asset or not, within the Project's areas of below ground impact in the vicinity of the site of excavated Romano-British settlement remains – lead coffin (4081) (Pylons RG48) and the temporary haul road). The results of the geophysical survey will be tested through archaeological trial trenching in the near future. The Applicant is, therefore, confident that the assessment presented in [AS-070] is proportionate and appropriate based on the available data.</p> <p>Pylon TB47 was moved following Statutory Consultation to ensure the preservation of the known archaeological resource, and is now located in the adjoining field to the north-east, rather than directly to the south of the excavation area as suggested by the Respondent. This change resulted both from information provided to the Applicant during consultation and as a result of the geophysical survey undertaken for the Project. The results of the geophysical survey of the adjoining fields were essential to inform the design development and ensure with reasonable certainty that there would not be other archaeological remains, of similar importance to asset (4081), in the location to which the pylons were moved.</p> <p>With regard to the setting of the asset, the assessment is presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], which concludes that the Project would result in a direct, permanent moderate adverse significance of effect on the asset, which is considered significant in EIA terms.</p> <p>Additionally, the Applicant has addressed this matter in HE2.11 and HE2.12 within 8.9.2 Applicant's Responses to Second Written Questions, submitted at Deadline 5.</p>

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REP4-329	Fordham Parish Council	<p>“The Secretary of State considers preservation by record does not amount to mitigation of harm for archaeological remains...” This principle applies directly here. NG's proposed approach of surveys, trial trenching, removal of finds, and demolition of any structural remains (walls, floors and the like) constitutes destruction by record, not mitigation. It would permanently deny the local community, future researchers, and future generations of archaeologists — amateur and professional alike — the opportunity to study these remains in situ.</p> <p>3. Factual Inaccuracies in NG's Evidence NG's documentation contains material factual errors that undermine the reliability of its assessment:</p> <ul style="list-style-type: none"> • NG states that the dig ran until 2021 and has concluded. This is incorrect. The excavation is still active and is expected to continue for several years to come. • The geophysical surveys were conducted in 2013 and 2014. NG's characterisation of the timeline is therefore also inaccurate in this respect. • NG makes no mention of the indoor fountain (piscina), the child Saxon burial, the additional Saxon burials, or the high-status Roman burials in lead-lined coffins. 	<p>The Applicant disagrees with the first bullet point. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] states that ‘...between 2015 and 2021, a programme of excavation was undertaken, uncovering an apsidal bathhouse complex with its associated cemetery.’ The Document does not indicate that the intermittent excavation of the site has stopped.</p> <p>The Applicant disagrees with the second bullet point. 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] states that a geophysical survey took place subsequent to a fieldwalking of the site which in turn took place following the identification of a lead lined coffin. This is the sequence of events as presented in <i>A Brief History and summary of the Fordham Roman site</i> (Oldham 2024)¹.</p> <p>With regard to the third bullet point, 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] records a lead-lined coffin (4093) and states that its presence and that of further burials indicates the ‘likely presence of a prosperous Roman villa with its own cemetery.’ Further basic details of asset (4081) are reported; however, it is not the function of the baseline report to fully detail the findings of all the archaeological excavations within the Project's study area. Rather, the baseline report includes enough detail to inform the assessment of value for the heritage assets within the study area, to inform the impact assessment.</p>
REP4-329	Fordham Parish Council	<p>4. Community and Educational Value NG's assessment entirely disregards the profound community and educational value of this ongoing excavation. The impact of the scheme will fall not only upon archaeology in the ground, but upon the community that has been working on this site since 2015 — a community that, in my submission, should be allowed to continue. Participants in the excavation have included:</p> <ul style="list-style-type: none"> • Students from across Europe; • A professor of archaeology from Argentina, who returns as a regular participant; • A family from Australia; • Approximately 30 regular volunteers from Essex and Suffolk; • Children from the Colchester branch of The Young 	<p>The Applicant disagrees that the Project will impact on the ongoing community excavation. As stated in response to REP4-329 above and in 8.8.1 Applicant's Comments on Written Representations [REP2-029], the Applicant has undertaken a detailed routeing and siting exercise, iteratively refined through statutory consultation, geophysical survey and archaeological trial trenching, to limit, so far as practicable, effects on known and potential heritage assets between pylons TB46 and TB52. The results of the geophysical survey suggest that the bounds of the asset lie outside the Project's areas of impact and that there are no associated archaeological remains at risk. The results of the geophysical survey will be tested and any mitigation in this area informed by evaluation through archaeological trial trenching of the areas of impact. Should unexpected archaeological remains be identified by the trial trenching, either related to asset (4081) or not, they will be mitigated under the terms of a Detailed Written Scheme of investigation approved by the Local Planning Authority Archaeological Advisor. Furthermore, the Applicant is committed to public engagement and outreach with regard to the historic and archaeological environment and details of this are included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] (updated version submitted at Deadline 5).</p>

¹ Fordham Local History and Archaeology Society, *A Brief History and summary of the Fordham Roman site*, (Oldham, July 2024)

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		<p>Archaeologists Club, who visit and participate in the dig — a genuinely rare opportunity for under-16s to engage with live archaeological fieldwork. This is not merely an asset to be assessed in isolation. It is an active, living archaeological project with local, national, and international reach.</p>	
REP4-329	Fordham Parish Council	<p>5. Additional medieval sites. Amongst the three other Roman sites (between pylons TB043 & TB044) in Fossetts lane there is a medieval site. This been on the HER for a long time and is listed as a probable moated site. It is sited right next to the pylon TB043, so is under threat. Geophysics and other research suggest it dates from at least 1250 (dated coin found), and pottery finds suggest it existed until the late 16th, maybe early 17th century. Because of the dateable finds and its position in the parish, this is highly likely to be the lost Norman manor hall of Great Fordham (aka Fordham Magna). The sites of the three other manors are known as later halls and still exist, while the location of the Great Fordham manor was "lost to memory" even in the 18th century.</p>	<p>The Applicant is aware of HER monuments in this area. The site of the moat (4104) has been geophysically surveyed confirming its presence. The location of pylon base TB43 to the north-east and the temporary haul road to the east have also been surveyed and the results suggest that there are no archaeological remains related to the moat present. The results of the geophysical survey will be tested through archaeological trial trenching in the near future.</p>
REP4-329	Fordham Parish Council	<p>6. Conclusion The whole of this area is of local and national importance. Asset 4081 has been systematically under-assessed by NG. The rare finds, the ongoing community excavation, the burial grounds, and the irreplaceable setting all demand a higher significance rating and a genuine re-examination of the proposed route in this area. I also note, with regret, that I have raised these matters with National Grid over a period of three years without any meaningful engagement with the substance of my concerns. I ask the Inspector to give proper weight to this representation.</p> <p>Inadequacy of Mitigation Assessment Pylon TB047.</p> <p>Fordham Local History Society/Colchester Archaeological Group have just discovered (26.4.2026) remains of building foundations which confirms our belief that there are further Roman buildings on the site that lie within NG's proposed planned working area. This means that the Roman site is larger, more</p>	<p>The Applicant disagrees with the respondent's first paragraph. Please see the Applicant's responses to these issues raised in REP4-329 Matters 1 and 2 above.</p> <p>The Applicant is aware that the bounds of asset (4081) are not fully understood and associated archaeological remains are likely to be located within the pulling location to the south west of pylon TB47. However, the pulling location would not result in below ground impacts.</p>

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REP4-329	Fordham Parish Council	<p>complex and probably more important than first thought. The entire field must be protected and avoided altogether.</p> <p>I wish to draw your attention to the serious effects that National Grid's (NG) plans will have on the roads of Fordham. I have previously been preoccupied with the visual blight on our beautiful valley and the devastation to our archaeology that the pylon route will cause and have neglected to deal with our roads; I am now addressing that omission. But first I will talk about our roads as they are; having been on Fordham Parish Council for some six years and now chairman, I can tell you that it is always our poor, crumbling and potholed roads that come up all the time and is the bane of our parishioners. Many have had burst tyres, broken wheels and even ended up beached on the edge of a road. The main reason for this is the dozens of HGVs and enormous tractor and trailers we get passing through every day, our roads were not designed to cope with this amount of heavy traffic. NG's plans will increase the road damage and inconvenience to parishioners considerably. I have attached a map with NG's plans and highlighted the three crossing points where their access road crosses our roads at A, B & C. <i>[see images provided in document]</i>. Note: south means looking south and north, looking north.</p> <p>point A. (what 3 words location: <i>///unpainted.announced.indicates</i>) Fossetts Lane 2 north.</p> <p>As you can see, this is an extremely narrow road, even a car and bicycle cannot pass each other, in the "south" picture the road bends to the right and goes down-hill, it is a totally blind bend and dangerous at the best of times. NG's very heavy plant and vehicles will crush this tiny road into the mud, it frequently has water running down it from the surround fields and springs. Hence "Fossetts" Lane. There is also a public footpath entering here, sign visible to left. Point B. (what 3 words location: <i>///whistle.hubcaps.ferrets</i>) Fossetts Lane 1 north.</p>	<p>The Applicant notes the concerns raised by the Respondent with respect to the proposed crossover arrangements on Fossetts Lane. The proposed Construction Access Strategy for the Project is set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This establishes that construction traffic for the Project will make use of defined Primary Access Routes (PARs) to travel between the SRN or MRN and proposed site access points. The proposed PARs in this area are shown in 7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section D [APP-316]. These show that Fossetts Lane is not proposed to be utilised as an access point, but rather a Crossover arrangement as described under Sections 5.5.6 to 5.5.10 of 7.3 Outline Construction Traffic Management Plan [Revision D]. In line with the approach set out in Section A.2 of 7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334], preliminary designs of these locations have been prepared by the Applicant and an audit undertaken overseen by Essex County Council as the Local Highway Authority. These locations are therefore considered to be suitable for the proposed usage.</p> <p>Further to this, with respect to the Respondent's comments around potential impacts on the condition of the public highway which may arise from the Project, the Applicant notes that condition surveys will be undertaken for impacted sections of the existing highway network and mitigation measures for issues identified from these will be agreed with Essex County Council as the relevant Local Highway Authority for this area, as set out in Section 5.2 of 7.3 Outline Construction Traffic Management Plan [Revision D].</p>

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REP4-329	Fordham Parish Council	<p>Again, this is a very narrow, single track section of Fossetts Lane, but this time NG thought it would be a good idea to put their crossing point between two blind bends! The two bends are only 75 metres apart! Their road will also cut a swath through 135m of trees planted by the woodland trust. On a similar subject: immediately south of pylon TB047, their access road cuts, diagonally through a hedge line, but it's not just low hedging, there are matures trees all along that field boundary. There are , not to mention colonies of rooks, jackdaws and a barn owl nest. Point C: Mill Road north, plus pylon.</p>	<p>The proposed Construction Access Strategy for the Project is set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This establishes that construction traffic for the Project will primarily use defined Primary Access Routes (PARs) to travel between the SRN or MRN and proposed site access points. The proposed PARs in the vicinity of Ford Street are shown in Sheet 3 of 7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section D [APP-316]. The Applicant emphasises that the PARs defined on this plan, and the routing of construction vehicles are different from the narrative provided by the Respondent. The route includes less than 0.4km of Fiddlers Hill and Mill Road between the proposed access bellmouths TB-B044/045 and TB-B046 in order to make use of the existing highway bridge crossing the River Colne.</p> <p>Further to this, with respect to the Respondent's comments around potential impacts on the condition of the public highway which may arise from the Project, the Applicant notes that pre- and post-condition surveys will be undertaken for impacted sections of the existing highway network and mitigation measures for issues identified from these will be agreed with Essex County Council as the relevant Local Highway Authority for this area, as set out in Section 5.2 of 7.3 Outline Construction Traffic Management Plan [Revision D].</p>

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		<p>three terrace cottages on the right. (What 3 words location: ///heightens.commuted.sprouts). This is a very good vantage point to look across the Colne River valley to Colchester; the water tower (aka "Jumbo") is visible, on the horizon, nearly four and a half miles away! The pylons will march from left to right across your field of vision in the field immediately in front of you. FYI, our Roman dig site is in the top right hand corner (north-east) of the same field. Please consider all of the above when making your decision regarding our landscape and heritage.</p>	
REP4-328	Essex County Council	<p>Comments on Deadline 3 Submissions - 7.4 Outline Landscape and Ecological Management Plan (Tracked) (Final Issue D) (REP3-031)</p> <p>ECC welcomes the updates made to the Outline Landscape and Ecological Management Plan (OLEMP), which now address the majority of the Green Infrastructure (GI) matters previously raised. In particular, the document provides greater clarity on governance arrangements, monitoring and aftercare (including long-term management for BNG Environmental Areas), adaptive management, stakeholder engagement mechanisms, and the distinction between mitigation, enhancement and compensation, with appropriate cross-referencing to the Biodiversity Net Gain Report.</p> <p>ECC also welcomes the addition of and clarification that hedgerows and watercourses enhanced as part of Biodiversity Net Gain mitigation, and located outside the Environmental Areas, will be subject to a five-year monitoring and management period, supported by defined aftercare arrangements and invasive species control measures. ECC further welcomes the establishment of an Ecology Working Group post-consent,</p>	<p>The Applicant maintains that a five-year aftercare period is sufficient to ensure successful establishment of the reinstatement planting across the Project (8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]). Around the Environmental Areas, the Applicant has, however, committed to a 30-year aftercare period. The five-year aftercare period is supported by British Standard BS 8545:2014+A1:2026², in addition to other guidance such as the most recent Tree Council guidance³ and government guidance on how to look after newly planted trees⁴. It is important to clarify that once the five-year aftercare period is complete, although the Applicant will not continue to maintain the planting outside of the Environmental Areas, these areas will be returned to the landowners and be maintained as it was previously.</p> <p>The Applicant's response to written question BIO1.38 set out in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] details how at each Environmental Area the different Local Nature Recovery Strategies have been applied with reference to 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision B] and 7.1 Biodiversity Net Gain Report [APP-299]. This includes the Essex Local Nature Recovery Strategy, as requested by the Council. The final Landscape and Ecological Management Plan must be substantially in accordance with the Outline Landscape and Ecological Management Plan. Outside the Environmental Areas, planting will comprise reinstatement planting, essentially the reinstatement of planting where it has been removed to facilitate the Project (subject to constraints). The relevant Local Nature Recovery Strategy will be considered in relation to this planting onsite. Details of the planting within the Environmental Areas and reinstatement planting will, however, be submitted to and approved in writing by the relevant Local Planning Authorities under Requirement 4 and Requirement 9, respectively. The relevant Local Planning Authorities will therefore review and approve any planting details.</p> <p>As previously stated, the Applicant will consider the Local Nature Recovery Strategies as part of the offsite biodiversity net gain (BNG) selection process, where sites are available, and appropriate to the Project. This offsite selection process would take into consideration the potential for wider habitat connectivity and enhancement across the three counties, as well as specific areas of importance to biodiversity. Full details of the offsite solution would be provided to the Local Planning Authorities post-consent.</p>

² British Standards Institution (2026) BS 8545:2014+A1:2026 Trees from nursery to independence in the landscape – Code of practice

³ [Caring-for-newly-planted-trees-2025.pdf](#)

⁴ [Maintain new trees after restocking - GOV.UK](#)

Examination Library Reference	Interested Party	Matter	Applicant's Response
		<p>providing a clear mechanism for governance, engagement and oversight of ecological mitigation during construction.</p> <p>ECC notes, however, that there remains a need for appropriate flexibility beyond the initial five-year monitoring period, where monitoring outcomes demonstrate that establishment objectives have not been fully met or where remedial management is required to secure the intended GI and BNG outcomes.</p> <p>While the OLEMP refers to local landscape character and commitments to wider biodiversity outcomes, it does not explicitly demonstrate how GI and associated enhancement measures have been aligned with, or informed by, the Essex Local Nature Recovery Strategy (LNRS). ECC therefore maintains its request that the final LEMP include explicit reference to LNRS priorities and confirm how these have informed the spatial delivery of Green Infrastructure and, where applicable, on-site and off-site enhancement associated with BNG delivery.</p>	<p>The Applicant has updated 7.4 Outline Landscape and Ecological Management Plan [Revision E] to reflect the commitment in relation to the consideration of the Local Nature Recovery Strategies.</p>
REP4-328	Essex County Council	<p>Comments on Deadline 3 Submissions - 8.10.1. Ancient Woodland Technical Note (Final Issue A) (REP3-058)</p> <p>ECC acknowledges that the document responds to recent updates to the Ancient Woodland Inventory and associated datasets and notes the Applicant's conclusion that no material changes to the submitted assessments are identified.</p> <p>From a GI perspective, ECC notes that the identification of additional ancient woodlands reinforces the importance of robust buffers, sensitive design, and long-term management of retained woodland, veteran trees and associated habitats as integral components of the wider GI network. ECC welcomes the confirmation that updates to the Outline LEMP, and the Ancient Woodland and Veteran Tree Strategy have been made to reflect the updated data. ECC continues to emphasise the importance of securing effective delivery, monitoring and adaptive management of GI, including woodland and buffer areas, through</p>	<p>The Applicant acknowledges the comment and confirms the approach to contributing to the Green Infrastructure (GI) network with commitments in 7.4 Outline Landscape and Ecological Management Plan [Revision E] for onsite and offsite tree planting secured under Requirement 4 and Requirement 9 respectively of 3.1 Draft Development Consent Order [Revision E].</p> <p>Additionally, the Outline Landscape and Ecological Management Plan [Revision E] and 7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032] contain mitigation measures when working near Local and County Wildlife sites, Roadside Nature Reserves, Ancient Woodland and Veteran trees.</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-328	Essex County Council	<p>the final LEMP and associated governance arrangements.</p> <p>Comments on Deadline 3 Submissions - Amended Outline CTMP (Document 7.3 Rev B) (REP 3-029)</p> <p>Details of the number and type of vehicles using the access and the duration, the route to be used to the access, and locations of access points should be included for clarity in Table 5.2. As raised in ECC's response at Deadline 3 to ExQ1 (REP3-078) ECC is unclear on which locations are to be used by construction traffic outside of the PARs or how much activity is associated with them to understand whether they should be considered in more detail. ECC is also aware of concerns raised by Writtle College in relation to access and request further details on the alternative options that are being explored. In relation to accesses other than those already identified as PARs, these should also be safe, suitable and compliant with current standards and able to accommodate the vehicles that will be using them.</p> <p>At paragraph 5.8.5, ECC would request that bus service operators are included as a relevant stakeholder.</p> <p>At paragraph 6.6.1, line 2 should be updated to include the bold wording as follows: "...including but not limited to North Falls and Five Estuaries Offshore Wind Farm..." as other projects that we are not currently aware of may be implemented in the future that could impact</p> <p>Amendments as set out in our Deadline 3 response to ExQ1 (REP3-078) should be considered for the next updated version.</p>	<p>Table 5.2 in 7.3 Outline Construction Traffic Management Plan [Revision D] details the types of vehicles anticipated to be using the non-PARs.</p> <p>The location of each of the construction activities listed in Table 5.2 will be dependent on a wide range of factors, including third-party requirements, site-specific conditions, programme and the Main Works Contractor determining where further investigations are required. It is therefore not feasible to identify each of the routes and access points associated with each of these activities.</p> <p>These activities are not expected to be onerous in terms of time or associated with a high volume of HGV vehicles. The average duration for activities on non-PARs is less than a week, with bellmouth construction the most time intensive at approximately three weeks. The most onerous activity is the construction of bellmouths, with approximately 20 daily HGVs.</p> <p>The Applicant has assessed the anticipated traffic increases associated with the pre-commencement activities on the local road network that do not form part of the PARs. Particularly, the assessment has focused on those roads where crossover bellmouths will be constructed as these have the highest traffic movements. The analysis indicates that the expected peak daily traffic associated with these activities is low and duration is short-term, and in general the total traffic increases remain below 10% except at those locations where baseline traffic volumes are very low.</p> <p>The Applicant has had a meeting with ECC to discuss the access arrangements and options that are being considered for ARU Writtle College. A technical note outlining the options identified has been submitted to ECC for consideration.</p> <p>The Applicant has updated paragraph 5.8.5 (now paragraph 5.8.6) of 7.3 Outline Construction Traffic Management Plan [Revision D] submitted at Deadline 5 to explicitly include bus service operators as a relevant stakeholder.</p> <p>Paragraph 6.6.1 of 7.3 Outline Construction Traffic Management Plan [Revision D] has been updated at Deadline 5 to state '<i>...including but not limited to North Falls and Five Estuaries Offshore Wind Farm...</i>'.</p> <p>The Applicant provided a response to the Essex County Council Deadline 3 response to the ExQ1 [REP3-078] in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299].</p>
REP4-328	Essex County Council	<p>Appendix B – Property and Viability Impact of N2T on Dunton Hills Garden Village: Response to National Grid, April 2026</p>	<p>The Applicant has considered the content of Appendix B of the ECC response [REP4-328], and specifically on 'Chapter 2 - ECC and Savills Comments on National Grid Response' of that appendix. The response below firstly repeats ECC's specific response (omitting references for brevity), using the relevant section or paragraph numbers, and then sets out the Applicant's response in italics.</p> <p>2.1.1. ECC welcomes National Grid's engagement with the findings of the DHGV Viability and Impact Assessment and notes that both parties share the overarching goal of ensuring the successful and timely delivery of Dunton Hills Garden Village.</p> <p>NGET Response: <i>Noted.</i></p>

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2.2.1. Viability in planning is inherently a material planning consideration in accordance with national planning policy and professional guidance, and a range of appeal decisions. Planning authorities are under a statutory duty to determine an application in accordance with the development plan unless material considerations indicate otherwise. Viability appraisals can and should be used to analyse and justify planning obligations to ensure that Section 106 requirements do not make a scheme unviable.

2.2.2 In overall terms viability relates to the relative balance between the value generated by development and the costs associated with delivery. If a scheme is not viable, then it is unlikely to come forward. The importance of viability is such that policy seeks consideration of viability at the plan making stage with future deviation from policy contributions reserved to the applicant to demonstrate why the viability of their development is compromised owing to changes in circumstances since the plan was prepared and adopted.

NGET Response:

As set out in the 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], it has been held via the courts that planning is concerned with land use decisions to be made in the public interest, not private interests such that matters such as impact on property values are not considered material in the determination of planning applications. This position is very clearly stated and confirmed in Planning Practice Guidance (PPG) 'Determining a planning application'⁵ at paragraph 008.

Accordingly, the Applicant retains its position that property values are not a material planning consideration for the purposes of determining this DCO application.

The ECC and Savills response refers to viability and refers to the National Planning Policy Framework⁶ (NPPF) paragraph 59 in this regard. However, it should be noted that NPPF paragraph 59 is concerned with the acceptability and justification for planning obligations and not the determination of planning applications by reference to the development plan and relevant material considerations that is specifically addressed in separate paragraphs earlier in the NPPF. Paragraph 59 advises: 'Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable'. The Development Plan is up-to-date having been adopted in March 2022.

Paragraph 59 goes on to state: 'It is up to the applicant [for planning permission] to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage' including consideration of matters such as 'any change in site circumstances since the plan was brought into force'.

In that context of paragraph 59 of the NPPF the ExA should note and attach weight to the fact that the new owners of the DHGV site (LIH) have confirmed in their Deadline 3 Response [REP3-118] that 'It is not expected that the DCO Project will affect the viability of the site' and notes that if there is a loss then that would be recovered from NGET (through the compensation mechanism).

Accordingly, the Applicant's position is that viability is a consideration in the plan-making process to ensure the overall viability of sites proposed to be allocated in development plans in order to that the development plan can be considered to be sound when examined. Adverse effects on property prices are not a material consideration in the planning process and in any event LIH has confirmed that the DCO project is not expected to affect the viability of the Dunton Hills Garden Village development.

2.3. Residual Land Value as an Indication of Viability

NGET Response:

⁵ Ministry of Housing, Communities and Local Government (2026) Guidance – Determining a Planning Application

⁶ Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

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			<p><i>Residual land value (RLV) is a factor in viability, however, there is no indication that, in this instance, the overhead power lines will affect RLV, or if it did, that this will be a material reduction or that it will lead to the proposed scheme becoming technically unviable. This position is supported by LIH in their Deadline 3 Response [REP3-118].</i></p> <p>2.4. Impact on Gross Development Value is not covered in Contingency NGET Response: <i>A contingency in a building contract is a sum of money set aside within the contract price to cover unforeseen costs or risks that may arise during construction: it provides a financial buffer for unexpected issues such as design changes, unknown site conditions, price increases, or minor variations.</i> <i>Gross development value (GDV) is assessed at the point of assessing viability but does not remain a constant.</i></p> <p>2.5. Status of the LSE Work NGET Response: <i>The London School of Economics (LSE) paper is an academic discussion paper that applies an econometric model to examine whether there is any statistical relationship between property values and the presence of existing overhead lines and pylons within a defined vicinity. As such, it may be of interest as part of the wider academic literature on this topic. However, the paper's methodology should be understood in its proper context. The formula applied — $Y_{ijt} = \alpha_j + \delta P_{ylonjt} + \beta_k P_{ylonk} + X1 \varphi + \pi + \varepsilon_{ijt}$ — is a research tool designed to test associations within datasets and is not a valuation method used in professional practice.</i> <i>It is important not to equate the findings of this discussion paper with the outcome of a property valuation undertaken in accordance with the Royal Institution of Chartered Surveyors' Red Book. The paper does not apply the established methods ordinarily relied upon by chartered valuation surveyors, including professional inspection, analysis of directly comparable market evidence, or other market-based valuation techniques used to determine the value of a specific property at a specific point in time. In addition, the paper does not appear to address matters such as simple index linking or the distinction between general market movement over time and any specific localised influence. For those reasons, while the paper may provide a useful academic perspective, its findings should be treated with caution in any examination of individual property value effects and should not be regarded as a substitute for property-specific valuation evidence prepared in accordance with recognised professional standards.</i></p> <p>2.6. Impact on Residual Land Value is Much Higher than Impact on GDV NGET Response: <i>It is correct to note that a variation in GDV will be magnified though to RLV because other inputs remain unchanged. However, the evidence does not support the contention that GDV will be impacted, a point that is reinforced by the recent purchase by LIH, the bid for which will have factored any deleterious effect into it and by LIH in their Deadline 3 Response [REP3-118].</i></p> <p>2.7. Recent Trends in Costs and Values Will Tend to Reduce Viability NGET Response: <i>Insofar as costs increase and/or values decrease then the impact will be on RLV and, inevitably risking viability.</i> <i>It is noted that, notwithstanding alleged concerns on this point, no viability appraisal has been undertaken since June 2022 except by LIH in assessing their bid. Furthermore, it should be noted that there is no reliable evidence relating to viability presented by Savills or ECC, and LIH has proceeded to purchase the site in the full knowledge of the overhead line proposals and has confirmed that the overhead line is not expected to impact the site's viability. In addition, LIH have advised that the Section 106 agreement relating to the development will be concluded shortly and</i></p>

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that good progress is being made on the detailed terms of that agreement and future reserved matters proposals. That would not be the case if the viability of DHGV was in doubt.

2.8. Phasing and Impact on Viability

NGET Response:

*The impact on viability of events that take place at a much later phase of development are reduced by the egress of time. In the case of DHGV the approved phasing means that residential development in the vicinity of the proposed overhead line is still a number of years away such that the overhead line would be an established feature in the landscape at the time that housing is built and occupied (as previously set out in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**). There is no reliable evidence, only assertion from Savills, that viability will be affected and that assertion is not supported by the site owners, LIH.*

2.9. Status of Affordable Housing

NGET Response:

*As set out in the **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, there is no indication from the DHGV site owners that the original affordable housing target is not achievable. This position has not changed since that response was drafted and, indeed, has been confirmed by LIH in its Deadline 3 Response **[REP3-118]** and is evidenced by LIH's confirmation that the Section 106 in relation to the development is progressing well.*

2.10. Status of Existing 132 kV Power Line

NGET Response:

*LIH in their Deadline 3 Response **[REP3-118]** acknowledged that 'The existing OHLs would be undergrounded and diverted. The planning application has been devised on this basis'.
An assessment on viability which ignores a key benefit is an incomplete assessment - limited reliance can be placed on an assessment undertaken in this way.*

2.11. Conclusion

NGET Response:

*It is the Applicant's view that none of the points made provide firm arguments or reliable evidence against the Applicant's position that the overhead line will not impact the delivery of DHGV (a position supported by LIH). Furthermore, whilst Savills state in paragraph 2.11.1 that 'a more certain way to proceed would be to pursue the option of underground power lines across the site or other forms of mitigation to be agreed with the relevant planning authority', this response fails to recognise that undergrounding would have a more significant impact on DHGV and adjacent land in terms of reducing developable land (whereas the overhead line, as proposed, would not have any impact in this regard).
In terms of 'other forms of mitigation', whilst Savills do not indicate what these might be, the Applicant can confirm that it has discussed with ECC and BBC the potential for providing landscaping to the eastern side of the DHGV site. The Applicant can also confirm to the ExA its willingness to progress those discussions.
There is insufficient reliable evidence to conclude that GDV is impacted by the Project. It is noted that (having just purchased the site) LIH has confirmed in their Deadline 3 Response **[REP3-118]** that the DCO Project is not likely to affect the viability of the site and, in any event, notes that there is a mechanism for recovering loss and that the Section 106 in relation to the development is progressing well.*

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REP4-328	Essex County Council	<p data-bbox="670 247 1190 275"><i>Appendix F – Comments on REP3-070</i></p> <p data-bbox="670 289 1264 352"><i>Page 54 - Restrictions on HGVs using PARs past schools</i></p> <p data-bbox="670 367 1299 911">ECC require timing restrictions on HGV routes during school drop off/pick up in the locations identified. The Applicant has included restriction on construction traffic to avoid the pick up and drop off times of the school in Margaretting only. The Applicant has provided justification for limiting the restrictions on PARs based on a review of infrastructure. However, ECC have stated that observations to understand patterns of movement and behaviour should be undertaken to fully understand the risks as set out in ECC's Response in document REP3-077. The following additional points are noted by ECC as set out in the latest SoCG issued on 7th May 2026:</p> <ul data-bbox="670 926 1299 1478" style="list-style-type: none"> <li data-bbox="670 926 1299 1129">• It can be easily observed that pupils tend to have more unpredictable behaviour when navigating the highway network surrounding schools. During the rest of the day it may be relatively quiet compared to the school drop off/pick up times <li data-bbox="670 1144 1299 1478">• Whilst the Applicant mentions existing highway infrastructure is available there are examples where footways are non-existent or constrained (for example on A176 where parents drop off/pick up children at Billericay School) or where footways are narrow without any verge protection (for example in Cressing where parents and children are likely to be walking to/from the local area along the PAR) 	<p data-bbox="1308 247 2828 554">The Applicant has undertaken a review of all schools listed by ECC and provided a detailed response within 8.4.1 Applicant's Comments on Relevant Representations [Revision B] [REP2-023] as to why the schools noted by ECC have not been subject to restrictions in relation to HGV movements during school drop-off and pick-up times. However, the Applicant has held further engagement with ECC over their continued concerns regarding the movement of schoolchildren arriving and leaving school on or near to Primary Access Routes used by construction traffic. As detailed within the response to TT 1.36 of 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299], the Applicant has discussed undertaking site observations at the schools listed by ECC during school drop-off and pick-up times to confirm site conditions. The Applicant will keep this matter under review and will continue to discuss it with ECC as part of the SoCG.</p>

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REP4-328	Essex County Council	<p data-bbox="670 243 1196 275"><i>Appendix F – Comments on REP3-070</i></p> <p data-bbox="670 285 1154 352"><i>Page 55 - Monitoring and Review of Assumptions on Traffic Generation</i></p> <p data-bbox="670 363 1294 394">To update paragraph 5.4.17 of the CTMP with:</p> <ul data-bbox="670 405 1294 982" style="list-style-type: none"> <li data-bbox="670 405 1294 716">• “The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed.” · <li data-bbox="670 726 1294 793">• To update Section 2.3 Working Hours to include the following: <li data-bbox="670 804 1294 835">• Staff working hours will be [insert] <li data-bbox="670 846 1294 982">• Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs · <p data-bbox="670 993 1294 1060">Table 6.1 at “Monitoring of vehicles and road network” to include:</p> <ul data-bbox="670 1071 1294 1138" style="list-style-type: none"> <li data-bbox="670 1071 1294 1138">• Monitoring vehicle movements of HGVs and construction workers. <p data-bbox="670 1148 1294 1350">ECC also requested that the applicant should set out some examples of corrective actions that could be taken in the event of non-compliance which would be agreed with the LHA and/or community members. We provided some suggestions as follows:</p> <ul data-bbox="670 1360 1294 1923" style="list-style-type: none"> <li data-bbox="670 1360 1294 1707">• extending the programme of works to reduce the impact of traffic; • warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site; and further disciplinary actions as necessary for repeated incidents • closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or <li data-bbox="670 1717 1294 1923">• implementing additional shuttle buses to reduce worker traffic. Update to the list of non-compliance at Section 6.4.1 as follows: <ul data-bbox="715 1822 1294 1923" style="list-style-type: none"> <li data-bbox="715 1822 1294 1923">• Construction traffic (including workers) operating outside the agreed hours · The list of non-compliance at Section 6.4.1 to 	<p data-bbox="1308 243 1893 275">An update on each point noted is as follows:</p> <ul data-bbox="1308 285 2858 1350" style="list-style-type: none"> <li data-bbox="1308 285 2858 531">• Section 5.4.18 of 7.3 Outline Construction Traffic Management Plan [Revision D] was updated at Deadline 4 to address the point regarding a review of the vehicle movements against the assumptions included in 7.11 Transport Assessment [APP-333] and the Environmental Statement. Section 5.4.18 now states ‘<i>The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within the Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4)</i>’. <li data-bbox="1308 541 2858 846">• The Applicant notes the request to state staff working hours and add a restriction on staff access, into the Outline Construction Traffic Management Plan. Core working hours are set out in Section 2.3 of 7.3 Outline Construction Traffic Management Plan [Revision D]. Section 5.4.14 of this document states how construction worker LGV vehicles are to arrive and depart outside the normal highway network peak periods (i.e., 08:00-09:00 and 17:00-18:00 Monday to Friday). It is assumed that admin and office workers will arrive on site within these peak hours and therefore are accounted for in the assessment of the AM and PM peak hours presented within 7.11 Transport Assessment [APP-333] (assumptions set out in Section 6.7). The Applicant does not consider it necessary to prescribe restrictions on staff arriving at or leaving site, and considers that it would have adverse health and safety implications, for instance, in case of emergencies. <li data-bbox="1308 856 2858 993">• Additional detail on the monitoring / scheduling of vehicles was added at Deadline 4 to Section 5.4.18 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This now states how the Main Works Contractor(s) will develop a booking/scheduling system to schedule HGV deliveries to site throughout the construction period. <li data-bbox="1308 1003 2858 1108">• The Applicant notes the request from Essex County Council on proposed actions for non-compliance. The Applicant has added paragraph 6.3.2 of 7.3 Outline Construction Traffic Management Plan [Revision D] to detail that further sanctions will be included within the final version of the CTMP. <li data-bbox="1308 1119 2858 1350">• The Applicant responded to the matter regarding monitoring and review, and that target setting should relate to specific groups of staff in 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]. The Applicant has updated 7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [Revision B] for Deadline 5 to include the assumptions incorporated into the construction trip generation. This includes the office staff and construction worker vehicle trip generation. The Applicant agrees that these will provide guidance to the appointed Main Works Contractor in their development of the final CWTP.

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		<p>include: • Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES</p> <p>In the response to the applicant's comments to ECC's LIR we included the following points relevant to the CTWP on car occupancy rates and mode share: • ECC requested that the monitoring and review, and target setting should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (i.e. office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2).</p>	
REP4-328	Essex County Council	<p><i>Appendix F – Comments on REP3-070 Page 57 - Requiring a robust commitment to mini buses in the Outline CTMP</i></p> <p>ECC have requested that the CWTP includes a firm commitment to providing a mini-bus. The Applicant has suggested in their latest response that the Contractor will review this when details of the workers are known. However, ECC believe this commitment can be included now as a key principle because wherever the workers are coming from there will be a need for a mini-bus to reduce vehicles coming to the site – for example, picking up from clusters of postcodes and/or key public transport nodes.</p>	<p>Section 5.13.2 of 7.3 Outline Construction Traffic Management Plan [Revision D] was updated at Deadline 4 to include a commitment in principle to explore the feasibility of providing a minibus to site, once the travel patterns of construction workforce are better understood. This may include services from key public transport nodes, such as railway stations, or from locations where clusters of workers are identified.</p> <p>The Applicant notes Essex County Council's preference for a fixed commitment at this stage. However, the Applicant considers that the suitability, routing and frequency of any minibus provision is dependent on the origin, distribution and working patterns of the construction workforce, which will only be fully known at the detailed design and construction planning stage.</p> <p>Notwithstanding this, 7.3 Outline Construction Traffic Management Plan [Revision D] establishes a clear principle that measures will be implemented to reduce the number of individual vehicle trips to site, including the potential provision of shared transport such as minibuses. The detailed arrangements for worker travel, including consideration of minibus provision, will be developed by the Main Works Contractor and secured through the final Construction Traffic Management Plan, which will be agreed with the relevant Local Highway Authority prior to commencement of works.</p>
REP4-328	Essex County Council	<p><i>Appendix F – Comments on REP3-070 Page 57 - Confirmation of reviewing the number of vehicles monitored against those assessed in the DCO.</i></p> <p>A commitment is required in the Outline CTMP for the non-compliance to be measured by comparing the monitored vehicle numbers against those assessed in the DCO. A list of potential interventions are to be included in the Outline CTMP to be discussed with ECC where there is a non-compliance.</p>	<p>Section 5.4.18 of 7.3 Outline Construction Traffic Management Plan [Revision D] was updated at Deadline 4 to address the need to review construction vehicle movements against those assessed within the DCO application. Section 5.4.18 now confirms that</p> <p><i>'The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within the Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4).'</i></p> <p>In addition, Section 5.4.19 confirms that where monitoring identifies potential exceedances that could give rise to materially new or materially different residual effects, the Main Works Contractor will engage with the Applicant and the relevant Local Highway Authority to identify and implement appropriate mitigation measures.</p> <p>The Applicant considers that this approach provides an appropriate and proportionate mechanism for identifying and responding to any exceedances, as it enables site-specific interventions to be developed in consultation with the Local Highway Authority, rather than prescribing a fixed list of measures at the outline stage. The framework for monitoring, review and mitigation will be secured through the final Construction Traffic Management Plan, which will be agreed with the relevant Local Highway Authority prior to commencement of works.</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-331	Norfolk County Council	<p data-bbox="670 247 1294 310"><i>Response to outline CTMP revision B [REP3-029]</i></p> <p data-bbox="670 323 1294 596">NCC makes no comment on changes introduced to correct typographical errors except to query the change made to the entry for H08-A1 in Table 5.1, in which the most onerous anticipated AIL/special order vehicle has been changed to be a Large Mobile Crane (0 t). NCC suggests this change may have been introduced accidentally.</p> <p data-bbox="670 609 1294 911">Section 5.4 introduces an exception to the principle that construction traffic will be routed from the strategic route network and the major route network to site accesses via the primary access routes ("PARs"). Paragraph 5.4.2 sets out that certain construction vehicles may use roads which are not PARs and Table 5.2 sets out example construction activities and vehicle types to which this exception applies.</p> <p data-bbox="670 924 1294 1226">During ISH2 the Examining Authority sought clarity from the applicant as to the extent and purpose of this exception. The applicant confirmed that this exception is intended to apply only prior to the availability of the haul road. As currently written, the text of paragraph 5.4.2 is ambiguous as to whether vehicles may be able to use non-PAR routes after the establishment of the haul road.</p> <p data-bbox="670 1239 1294 1499">NCC is content with the outline CTMP including provision for the use of non-PAR routes in limited circumstances but would request that the language is adjusted to be clearer about the exact nature of those limits. NCC understands from hearing the applicant's submissions at ISH2 that this is the applicant's intention.</p> <p data-bbox="670 1512 1294 1730">Paragraph 5.8.4 has been amended to make clear that local highways authorities will be able to review and approve traffic management measures through permit schemes rather than simply be informed of them. NCC welcomes this change.</p> <p data-bbox="670 1743 1294 1940">New paragraph 5.8.5 introduces a requirement for the applicant to use reasonable endeavours to inform stakeholders such as royal mail or the blue lights services of any road closures diversions or access arrangements that are considered to impact</p>	<ul style="list-style-type: none"> <li data-bbox="1308 247 2858 344">• The Applicant notes the accidental typographical error in Table 5.1 of 7.3 Outline Construction Traffic Management Plan. Table 5.1 of 7.3 Outline Construction Traffic Management Plan [Revision D] has been reviewed and updated for Deadline 5. <li data-bbox="1308 357 2858 495">• The Applicant welcomes NCC's comments around being content with 7.3 Outline Construction Traffic Management Plan including provision for the use of non-PAR routes in limited circumstances and comments raised on Section 5.4 are noted. The Applicant has updated paragraph 5.4.2 of 7.3 Outline Construction Traffic Management Plan [Revision D] to ensure that the proposed use of non-PAR routes is clear. <li data-bbox="1308 508 2858 571">• The Applicant notes that NCC is content with the changes made to 7.3 Outline Construction Traffic Management Plan Paragraph 5.8.4, Paragraph 5.8.5 and Table 5.10. <li data-bbox="1308 583 2858 785">• The Applicant notes NCC's comments around non-compliance, particularly regarding HGV drivers not adhering to the agreed routes without reasonable excuse. The Applicant considers the use of contingency routes in the event of an incident occurring which impacts on the safe and efficient operation of the road network as an example of a reasonable excuse for not using pre-defined construction routes. The Applicant added Section 6.3.2 of 7.3 Outline Construction Traffic Management Plan [Revision D] at Deadline 4 to state that further detail on the sanctions which could be applied will be included within the final Construction Traffic Management Plan. <li data-bbox="1308 798 2858 905">• Regarding Developer Forums, the Applicant updated Section 6.6.2 of 7.3 Outline Construction Traffic Management Plan [Revision D] at Deadline 4 to reflect the commitment to engage with other Forums set up and managed by other Local Highway Authorities, where appropriate.

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REP4-335	Suffolk County Council	<p>their operations at the earliest possible opportunity. NCC welcomes this change.</p> <p>Table 5.10 includes a change to the entry for the B1113/Wymondham Road junction to indicate that operation of the junction will be monitored. NCC is content with this change.</p> <p>Paragraph 6.4.1, which concerns matters which would be considered non compliance so as to assess if corrective measures may be necessary, has been amended so that now HGV drivers not adhering to the agreed routes without reasonable excuse will be investigated. NCC does not object in principle to allowing for reasonable excuses in applying corrective measures, but we question whether incidents can be excluded from investigation on the basis of a reasonable excuse. The fact of a reasonable excuse would require an investigation to establish, so it is not clear how an incident can be excluded from investigation before the excuse is established. In our view a reasonable excuse should become relevant later, i.e. to the application of corrective measures.</p> <p>We would appreciate clarity from the applicant about what type of reasons might constitute a reasonable excuse. Further, it would be helpful if the outline CTMP could outline what types of corrective measures might be available.</p> <p>The addition of paragraph 6.6.2 commits the applicant to engage with a developer's forum in Essex to continue and formalise project coordination. There is not a pre-existing forum in Norfolk, but NCC would see the value in one and would be interested in exploring options with the applicant.</p>	These tables are responded to in detail in Appendix A of this document.
		<ul style="list-style-type: none"> • Table 1: 3.1 (C) Draft DCO [REP3-004] • Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009] Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025] • Table 4: 7.3 (B) Outline Construction Traffic Management Plan [REP3-028] • Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030] 	

Examination Library Reference	Interested Party	Matter	Applicant's Response
		<ul style="list-style-type: none"> Table 6: 7.4 (B) Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032] Table 7: 8.10.1 (A) Ancient Woodland Technical Note – Part 1 [REP3-058] and Part 2 [REP3-059] Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]. 	
REP4-335	Suffolk County Council	<p>Table 9: 8.9.1 (A) Applicant's Response to First Written Questions [REP3-074]</p> <p>Table 10: 8.9.1 (A) Applicant's Response to First Written Questions – Appendix A (Answer to DCO 1.S8) [AS-090]</p>	<p>As they relate to the Applicant's response to ExQ1, the Applicant has responded to these aspects of REP3-335 within 8.4.13 Applicant's Response to Comments on its ExQ1 Responses, also submitted at Deadline 5. Please refer to that document.</p>
REP4-337	Tendring District Council	<p>TDC further notes that the Applicant submitted updated documentation relating to Onshore Substations Operational Noise and Outline Noise Complaints Protocol (Revision E) (including North Falls and Five Estuaries) on 11 May 2026 at 16:00, i.e. the day prior to Deadline 4. Given the timing of this submission, TDC has not had sufficient opportunity to undertake a full and detailed review of this material. Accordingly, the Council's comments at this stage are necessarily preliminary and without prejudice to further, more detailed submissions at a later stage in the Examination. TDC's initial observations are as follows:</p> <p>From a resident's perspective, the Protocol is not yet a usable or accessible document:</p> <ul style="list-style-type: none"> It states that the final protocol will include contact details and possibly a central complaints point, but this is not yet defined There is no clear, step-by-step instruction setting out: <ul style="list-style-type: none"> Who a resident should contact; Whether there will be a single contact point or multiple operators; How complaints should be made (phone, email, online portal); 	<p>The Applicant notes Tendring District Council's preliminary concerns raised in their Deadline 4 response and we will review their further comments at Deadline 5.</p> <p>The Onshore Substations Operational Noise and Outline Noise Complaints Protocol [Revision B] (see Appendix B.2 of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]) ('the Protocol') is an outline document and the draft DCO Requirement requires a final protocol to be submitted to and approved by the relevant local authority. The outline Protocol is not designed for resident interpretation due to the complexities of the three intertwining applications for development consent and is targeted towards the acoustic representatives of the relevant local authorities. The document is necessarily lengthy, as it sets out the various methods of potential complaint assessment. It is not considered opaque as the document is drafted as a standard operating procedure. The outline Protocol is designed as a binding agreement between the substation operators, not as a handbook for and how to deal with local residents' possible noise complaints – as each company will have their own community liaison procedures. The complaints and communications procedures for the Norwich to Tilbury Project are committed to within 7.2 Outline Code of Construction Practice (CoCP) [Revision E] and not the Protocol.</p> <p>The final version of the Protocol will include timeframes that are approved by the relevant local authority and considered achievable by each substation operator. The Applicant does not consider it necessary to finalise these details prior to DCO consent, as the primary purpose of the Protocol will be to identify the method by which a complaint would be investigated.</p> <p>The substation operators are responsible companies. If the primary investigator finds the substantiated noise complaint is not related to their premises, they would determine the likely cause and flag this to the other substation operators. The linear approach described in the Protocol is a fallback position to ensure that the complaint is not overlooked by the operators.</p> <p>The Applicant considers the complaint investigation timeline set out in the Protocol challenging but appropriate. The Applicant notes that there is currently no Institute of Acoustics good practice guide for substations, however, comparing the time periods against the Good Practice Guide for onshore wind turbines⁷, the proposed timescales put forward in the proposed timings in the tripartite noise protocol are considerably shorter. For example, the Guidance provides for 21 days for an operator to employ a consultant to investigate a complaint (see example planning condition (c)), but the outline Protocol provides 10 working days for the same process. Additionally, the Guidance states two months for the assessment to be issued from the end of measurements, but the outline</p>

⁷ Institute of Acoustics (2013) A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise

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		<p data-bbox="715 243 1205 310">– What information a resident must provide.</p> <p data-bbox="670 363 1234 430">The Protocol includes a number of internal process timescales, for example:</p> <ul data-bbox="670 443 1294 1157" style="list-style-type: none"> <li data-bbox="670 443 1264 470">• Initial walkover inspection within 48 hours <li data-bbox="670 485 1228 552">• Appointment of an acoustic consultant within 10 working days <li data-bbox="670 567 1264 634">• Monitoring undertaken within -10 working days thereafter <li data-bbox="670 648 1294 779">• Reporting within 15–20 working days after measurements This is an improvement and positive developments, however, from a resident's perspective: <li data-bbox="670 793 1219 861">• These timescales are fragmented and difficult to follow; <li data-bbox="670 875 1294 942">• There is no clear “end-to-end timeline” from complaint to resolution; <li data-bbox="670 957 1264 1087">• There is no guaranteed maximum resolution timeframe, leaving an affected resident in the dark about maximum timeframe outcomes; <li data-bbox="670 1102 1294 1169">• There is no commitment to interim updates at defined intervals. <p data-bbox="670 1213 1234 1344">There is a practical impact here because a complaint could realistically take several weeks or longer to resolve, with no clear communication obligations in the interim.</p> <p data-bbox="670 1398 1175 1425">The Protocol states that it will include:</p> <ul data-bbox="670 1440 1264 1507" style="list-style-type: none"> <li data-bbox="670 1440 1264 1507">• “Details of how regularly any complainant will be kept up to date” <p data-bbox="670 1522 804 1549">However:</p> <ul data-bbox="670 1564 1294 1862" style="list-style-type: none"> <li data-bbox="670 1564 1160 1631">• No actual frequency of updates is specified; <li data-bbox="670 1646 1294 1713">• There is no commitment to written updates or progress reports; <li data-bbox="670 1728 1294 1795">• There is no clear responsibility for resident liaison; <li data-bbox="670 1810 1190 1877">• There is no requirement for a single accountable lead across the three 	<p data-bbox="1308 243 2837 344">Protocol proposes 42 days to 49 days if the closest onshore substation is in compliance and 54 days to 68 days if the closest onshore substation is not compliant. It is therefore not accepted that the drafting or the timescales of the outline Protocol are not suitable as has been asserted by Tendring District Council.</p> <p data-bbox="1308 438 2837 537">Compliance is based on stringent rating levels against BS 4142:2014+A1:2019⁸. If compliance is achieved, significant effects are avoided. This approach is in accordance with industry best practice. This does not mean that receptors may not hear noise from the substations from time to time.</p>

⁸ British Standards Institution (2019) BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound

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		<p>operators, again leaving an affected resident without clarity and unknown accountable persons/groups.</p> <p>The investigation process is highly technical and operator-led, including:</p> <ul style="list-style-type: none"> • Application of BS4142 methodology; • Sequential testing of each substation; • Use of acoustic consultants and specialist measurements <p>While it appears technically robust, the process:</p> <ul style="list-style-type: none"> • Is not explained in plain language for residents; • Provides no clear narrative of what residents can expect at each stage; • Risks appearing opaque and inaccessible. <p>TDC have repeatedly explained to NGET, North Falls and Five Estuaries that our residents should not be expected to rely on a complex, multi-stage technical process without clear explanation of outcomes or next steps, especially not after everything that they will be going through over the next 5 years (and should the remaining DCOs be granted by the Secretary of State).</p> <p>The Protocol establishes a system whereby:</p> <ul style="list-style-type: none"> • The nearest operator leads initially, with responsibility potentially passing between operators if compliance is demonstrated <p>However:</p> <ul style="list-style-type: none"> • There is no single point of accountability for the complainant; • Responsibility may shift between operators, potentially causing delay; • At this stage there is nothing in the latest document offer TDC assurance that the complainant will be updated on progress with no visibility or control over this process. <p>The Protocol is also structured around compliance with a certain cumulative noise limit of 35 dB ... (technical details follow). However, again residents are not provided with clear, understandable thresholds, there is no explanation of what constitutes an</p>	

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		<p>unacceptable experience in lay terms, and if levels are technically “compliant,” the Protocol states no further action is required, even if disturbance is perceived – residents will be left confused and frustrated with such an unhelpful explanation.</p> <p>TDC’s overall position is that:</p> <p>While the Protocol demonstrates technical coordination between the three projects, it is currently not suitable in its present form from a community-facing perspective.</p> <p>In particular, it:</p> <ul style="list-style-type: none"> • Lacks clarity and accessibility for affected residents; • Does not provide a simple, transparent complaints pathway; • Fails to define clear, enforceable communication and response standards; • Introduces unnecessary complexity and potential delay due to multi-operator arrangements; • Does not provide sufficient certainty on outcomes, timescales, or mitigation delivery. 	
REP4-339	Thurrock Council	<p>The complaints management process in the updated Outline Code of Construction Practice (REP3-025) is currently too basic. Although it includes contact details and a requirement to log complaints, it lacks key elements such as defined response times, escalation procedures, ongoing communication with complainants, clear responsibility for resolving issues, and transparency through sharing records with the Local Planning Authority. This limits confidence that complaints will be handled effectively. Although Appendix E – Community Engagement and Public Information (APP-305) state the details of the above will be set out in a detailed complaints procedure but this has yet to be provided.</p>	<p>The Applicant is engaging with its Main Works Contractor to develop the complaints procedure and will also have regard to Local 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 [Revision E] which will be submitted at Deadline 6.</p>
REP4-339	Thurrock Council	<p>Similarly, the approach to noise and vibration monitoring is not sufficiently developed. There is no commitment to routine monitoring, no use of simple baseline checks like listening tests, no clear triggers for more detailed</p>	<p>The Applicant is happy to clarify this point. Noise and/or vibration monitoring would form part of a range of management measures as part of best practicable means secured by commitment NV01 of 7.2 Code of Construction Practice [Revision E]. Specific monitoring locations will be identified by the contractor as part of the detailed assessments and mitigation strategy, secured by commitment NV05 of 7.2 Code of Construction Practice [Revision E]. Where potential significant adverse effects are identified, noise and/or vibration monitoring may also</p>

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		<p>monitoring, and no defined thresholds for action or reporting requirements. The document (updated 7.2 Outline Code of Construction Practice) refers to monitoring and site inspections and monitoring following complaints, but it does not set out a clear, structured strategy. This could mean exceedances are occurring and if residents do not complain they can be subject to adverse impacts. Given the scale of the project, this is a significant omission.</p>	<p>form part of Section 61 agreements, secured through NV03 of 7.2 Code of Construction Practice [Revision E], through consultation with the relevant local authority. As indicated in the response, monitoring may also take place in the event that there is a complaint.</p>
REP4-347	Arqiva Limited	<p>Arqiva has conducted a Technical Assessment of the project following receipt of geolocation information provided to Arqiva in April 2026 by Fisher German, agents acting on behalf of the Applicant. As required by Arqiva in order to conduct their detailed technical network safeguarding assessment, this information included the precise locations of each of the proposed pylons. Arqiva's assessment shows that several of the proposed pylons will have a detrimental impact on the functionality of their existing network because the locations of the pylons are either within, or very close to, existing super high frequency (SHF) and microwave link paths.</p> <p>As the Examination will no doubt be aware, National Planning Policy Framework paragraph 121 provides specific protection for existing electronic communication services where the decision maker should ensure that they have considered the possibility of the construction of new buildings or other structure interfering with such services.</p> <p>In order for Arqiva's communications network to function effectively and efficiently it is essential that point to point SHF and microwave links are preserved. This requires line of sight between any given points on Arqiva's network to allow for digital communication. Where structures are situated within or close to existing link paths, there is the potential to damage and degrade the quality of existing links which disrupts the flow</p>	<p>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 the week commencing 8 June between both parties. This engagement will be captured in a Statement of Common Ground to be submitted into the examination at an appropriate future deadline.</p> <p>Arqiva Limited has not yet requested bespoke protective provisions, however, the Applicant stands ready to enter into such negotiations should Arqiva Limited request it.</p>

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		<p>of information and prevents information exchange.</p> <p>In this case, Arqiva has assessed that pylons RG48, RG132, JC33, TB61, TB62, TB66 and RG196 are situated either within or extremely close to link paths as summarised in the below table: <i>[see REP3-347 for table]</i></p> <p>Should the pylons be built in the locations proposed without change or mitigation, there is potential for significant negative interference with Arqiva's network which would degrade the quality of the communications network. It is on this basis that this objection is made.</p> <p>Arqiva appreciates that the project is at examination stage and that this objection is made relatively late in the overall Development Consent Order process. However, the relevant information Arqiva needed to run their Technical Safeguarding Assessment was not provided to Arqiva until early April 2026, fully six months after the initial request for specific geolocation information regarding the locations of pylons was requested. This was despite several instances of chasing and follow-up where it was made clear to representatives of the project why the precise locations of pylons are important to Arqiva and the implications for not providing the requested information. I would be happy to provide a record of email exchanges to the appointed Inspector upon request.</p> <p>Following the conclusion of their Technical Assessment Arqiva wrote to Fisher German on 27th April 2026 explaining in detail their concerns, potential possible solutions and inviting further dialogue. Unfortunately, these discussions have not progressed and Arqiva must now lodge their objections with the Examination. Arqiva remain amenable to receiving a response from the Applicant, or agents working on their behalf, to the results of their technical assessment with a view to overcoming concerns raised with regards to the impact of the proposed locations of the pylons described in the above table.</p>	

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REP4-348	ARU Writtle		Please refer to 8.4.11.1 Applicant Response to ARU Writtle [REP4-348] and ExQ2 CA 2.1 and HW 2.2.
REP4-349	Aukera Energy UK Limited	I write on behalf of Aukera Energy UK Limited in respect of the Norwich to Tilbury DCO to confirm that Aukera wishes to withdraw its representation (reference RR-0309) to the proposed DCO.	The Applicant acknowledges the withdrawal of RR-0309 .
REP4-352	Brumfelda	At the recent Hearing ISH2, we were hoping to raise the issue of the important Prehistoric and Romano-British site west of Broomfield. However, we noted that the ExA intended to discuss above ground historic assets only. We have therefore asked our expert witness to write the attached report instead. Our concern is that survey work by the Applicant has not yet taken place in our area. We understand from Essex County Council that it will take place shortly. However, we strongly believe this should have taken place much earlier so that adjustments to the proposed alignment can be made if necessary. In our earlier submission, we proposed a slight change to the route to better protect the site. We believe this in line with EN-5 which requires avoidance to be considered wherever possible as the first stage in the Mitigation Hierarchy. We request the ExA not to recommend approval of the application unless and until it is completely satisfied that our site will be protected.	The Applicant thanks the respondent for the submitted report. The Applicant would like to direct the respondent to 8.8.1 Applicant's Comments on Written Representations [REP2-029] where such matters, which were raised previously at Deadline 1 for example in REP1-343 and REP1-215 , have been addressed in detail. Following the geophysical survey noted in [REP1-343] the area of pylon base TB149 and the temporary haul road will be subject to archaeological trial trenching to test the results of the geophysical survey and to confirm if any archaeological remains associated with the temple site are at risk. If unexpected archaeological remains, associated or not with the temple, are identified they will be mitigated under the terms of a Detailed Written Scheme of Investigation approved by the Local Planning Archaeological Advisor.
REP4-360	Fordham Local History Society	As you are aware, I've been wittering on about the devastating effects that NG's pylon (or cable) plans will have on Fordham's archaeological heritage. To make it visually much clearer as to what is at stake I have attached NG's map, with their infrastructure overlays. I have now added all the archaeological sites in the vicinity with a key to what they all are. You will now see, clearly, why I am so concerned. NG has systematically ignored everything I said and sent them regarding this and not offered any response or interaction. <i>[See REP4-360]</i> for image.	The Applicant thanks the respondent for the submitted plan. The Applicant is aware of many of the heritage assets recorded on the plan but several of them are not recorded on the Essex or Colchester HERs. Nor are they included on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296] , 6.20 Scoping Opinion [APP-297] , 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] . The Applicant does, however, fully recognise the importance of safeguarding archaeological remains, and our approach is aligned with this principle. All areas in which the Project will result in below ground physical impacts between pylons TB43 and TB48 (and beyond) have, therefore, been geophysically surveyed. The geophysical survey has identified a small number of linear and discrete features of potential archaeological origin and these as well as 'blank' survey areas will be archaeologically trial trenched. If the trial trenching identifies archaeological remains requiring mitigation, this would be undertaken under the terms of a Detailed Written Scheme of Investigation approved by the LPAAA.
REP4-363	Lower Thames Crossing	In its Deadline 3 response [REP3-125] , NH LTC made the Examining Authority aware of its proposal to realign Brentwood Road, as part of the normal course of the detailed design of the LTC scheme. For that same	The Applicant acknowledges the update from Lower Thames Crossing and concurs with the update provided in respect of the ongoing engagement. An update to the SoCG will be provided at a future deadline. As detailed in matter 3.2.26 in the 8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP4-195] , the Applicant shared a technical note on 3 March 2026 with LTC and Natural England, as the statutory regulator for matters relating to ancient woodland and nitrogen deposition compensation. This note detailed the

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		<p>Deadline, Thurrock Council were asked to respond to the Examining Authority's written question DES1.13 to provide a view on the effectiveness of mitigation in relation to the Tilbury substation. The effectiveness of mitigation is something that will evidently be affected by the realignment of Brentwood Road and so NH LTC committed to commenting further on this matter at Deadline 4, once it had reviewed Thurrock's response to question DES1.13. Having regard to Thurrock's response [REP3-088], NH LTC can confirm that it has had an initial meeting with the Applicant to address concerns relating to the ancient woodland and nitrogen deposition compensation in the vicinity of the proposed Tilbury substation. Discussions are ongoing in order to understand the suitability of the alternative compensatory proposals being put forward by the Applicant and further updates will be provided by the Applicant and NH LTC once they are available.</p> <p>In line with the examination timetable, NH LTC has worked cooperatively with the Applicant in order to agree an updated SoCG for submission at Deadline 4. NH LTC will continue to engage with the Applicant with a view to reaching a resolution on the matters that remain outstanding.</p>	<p>selection process for the alternative nitrogen deposition and ancient woodland compensation sites. Meetings were held to discuss this approach on 6 March and 28 April. Natural England confirmed their acceptance of this approach, as detailed in matter 3.2.38 in 5.9.13 Draft Statement of Common Ground - Natural England [REP4-081].</p> <p>The Applicant remains committed to ongoing engagement with NH LTC on this matter, and anticipates that appropriate terms can be agreed to regulate this interface.</p>
REP4-365	Norfolk Gliding Club	<p><i>[Submission of a Statement of Common Ground as prepared by Norfolk Gliding Club – full document not replicated in this table for legibility purposes].</i></p>	<p>The Applicant notes that the respondent (Norfolk Gliding Club (NGC), the Operator of Tibenham aerodrome) previously submitted its own Statement of Common Ground (SoCG) as part of Norfolk Gliding Club Written Representation [REP1-256]. We note Operator amendments have been made within this most recent version in relation to Part 1, Section 3 (respective interests) and Section 4 (consultation approach), and Part 2, Section 2 (matters currently under discussion). This document and its previous iteration have not been shared directly with the Applicant for discussion, comment or agreement. No matters are raised which have not otherwise been addressed within the Applicant's submissions to date, which include:</p> <ul style="list-style-type: none"> • 8.8.1 Applicant's Comments on Written Representations [REP2-029] (pages 256 to 264 respond to REP1-256 and refer to Operator safeguarding, operator and aviation body consultation, impact assessment parameters and conclusions, operator risk acceptance, operational matter including aerotow-take offs, forced landings and competition finishes, air accidents, policy and guidance context, operational mitigations, SoCG progression) • 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (paragraphs 3.17.13 to 3.17.15 refer to engagement with the Civil Aviation Authority Airfields Advisory Team (CAA AAT) in relation to Tibenham) • 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070] (pages 187 to 190 respond to the Respondent's REP2-053 and refer to Operator consultation and impact assessments)

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-368	Pinsent Masons on behalf of Hornsea Project Three (UK) Limited	<p>The point of connection for the Hornsea Three Offshore Wind Farm is the Norwich substation. Hornsea Three commenced the authorised development (as defined in the Hornsea Three Order) in 2023 and has completed the installation of the onshore grid connection cables, including the section that will connect into the Norwich substation. The testing and commissioning of these cables will be completed once the necessary works at Norwich substation have been completed.</p> <p>Hornsea Three has an interest in the following plots listed in the Book of Reference [AS 018] pursuant to an option agreement with the landowner and/or as a result of a local land charge that was registered pursuant to</p>	<ul style="list-style-type: none"> • 8.9.1 Applicant's Responses to First Written Questions [REP3-074] (response to SS 1.8 at pages 613 to 618 refer to Operator aerodrome safeguarding, impact assessment parameters, mitigation and design change justification, SoCG progression) • 8.4.9 Applicant's Comments on any Further Information or Submissions received by Deadline 3 [REP4-298] (pages 266 to 278 respond to the Respondent's REP3-126 and refer to policy and guidance context, critical national priority infrastructure, impact assessment methodology, CAA AAT engagement, operator risk acceptance, design change justification, operational information sharing, operational matters including aerotow take-offs, forced landing and competition finishes) • 8.5.7 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-302] (pages 3 to 9 respond to Action 5 and refer to CAA AAT engagement and impact assessment methodology, British Gliding Association (BGA) engagement, forced landing risks, and Project design development). <p>Furthermore, 8.9.2 Applicant's Response to Second Written Questions [Revision A] provides a comprehensive position in relation to the Applicant's engagement with the operator and consideration of feedback during the development of the Project's design as well as attempted engagement to determine appropriate mitigation measures (see SS 2.3). The Applicant clarifies its position in relation to the relevance of the agent of change principle to the Project (see SS 2.4). Furthermore, the Applicant duly considers the use of low height pylons in the vicinity of Tibenham aerodrome, despite the operator position only more extreme mitigation measures would be acceptable (see SS 2.7)</p> <p>Section 3 of 8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249] provides summaries of outstanding matters between both parties to inform the Examination. Section 5 records correspondence between the Applicant and the Respondent, including recent engagement undertaken to attempt to resolve these matters. This included a proposed tri-lateral meeting (with the BGA also) to discuss gliding and Tibenham aerodrome-specific operations in order to develop associated impact assessments and mitigation measures. The Operator declined to attend the meeting. The outcome of the Applicant's discussions with the BGA are described within 8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision B] (see Appendix A of that SoCG for respective positions regarding gliding-specific operational parameters). Section 3 recognises dependencies on Operator engagement for the further progression of these matters. To this end we have proposed a follow-up meeting with both parties. In the interim, the Applicant's position remains that aerodrome operations can continue safety and substantial changes to the Project design are not justified.</p> <p>All parcels in which Hornsea 3 hold an interest have been included, reflecting their updated name rather than limiting inclusion to those identified in the Pinsent Masons letter, and all necessary amendments have been made to Section A of the 4.3 Book of Reference [Revision D]; however, a local land charges search is required to verify and fully understand the land charge entry referenced in that correspondence, which will be pursued with the relevant authority and, based on the land plans, is likely to be South Norfolk District Council.</p> <p>The Applicant can confirm that shape files have been provided to the AP on 26 May.</p>

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s134(6A) of the Planning Act 2008 in respect of the Hornsea Three Order. Please note that Hornsea Three has requested the GIS shapefiles from the Applicant in order to confirm the exact extent of the overlap:

Plot Number	Comments on Book of Reference
A-1/1	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/2	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/3	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).
A-1/4	The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables). In addition to the presence of its cables, Hornsea Three also has an interest in this plot as a result of the local land charge pursuant to the Hornsea Three Order.
A-1/5	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/6	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/8	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/53	Note that the correct name is now Hornsea Project Three (UK) Limited.

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A-1/56	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).
A-1/57	Note that the correct name is now Hornsea Project Three (UK) Limited.
A-1/58	Note that the correct name is now Hornsea Project Three (UK) Limited. The interest recorded for Orsted (UK) Limited should be changed to Hornsea Three (in respect of electricity generation cables).

Hornsea Three also requests that the Applicant corrects the nature of its interests (as per the table above) in the next iteration of the Book of Reference.

REP4-368	Pinsent Masons on behalf of Hornsea Project Three (UK) Limited	<p>As the above plots are also located within the Order limits for the Hornsea Three Order, Hornsea Three has extant compulsory acquisition powers over these plots pursuant to the Hornsea Three Order. Discussions are ongoing between Hornsea Three and National Grid Electricity Transmission plc (the "Applicant") in relation to the interactions between the two projects.</p> <p>Hornsea Three has entered into an Option Agreement with the Applicant (dated 29 March 2019) for the necessary rights for Hornsea Three's cables in land owned by the Applicant. The technical specification for, and routing of, Hornsea Three's cables was agreed with the Applicant prior to installation.</p> <p>However, Hornsea Three notes that the draft DCO [REP3-004] seeks the power to acquire land, acquire new rights over land, impose restrictions and to extinguish or suspend rights belonging to statutory undertakers subject to Schedule 16 of the draft DCO. This includes</p>	<p>The Applicant notes the comments from Hornsea Three and confirms that it has been in direct contact regarding the powers under The Hornsea Three Offshore Wind Farm Order 2020. Legal representatives for the Applicant and for Hornsea Three held an initial meeting on 14 May 2026 and the Applicant's lawyers provided some initial Heads of Terms (HOTs) for a side agreement for review on 20 May 2026.</p> <p>Once Hornsea Three's lawyers have had the opportunity to review and comment on the approach to the HOTs, the Applicant's lawyers will then provide a detailed side agreement containing the relevant protections for the Hornsea Three project. The Applicant anticipates that such side agreement will enable the two projects to co-exist and that there will be no serious detriment to Hornsea Three's undertaking.</p>
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Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-371	Royal Mail	<p data-bbox="670 243 1279 407">both the land where Hornsea Three has an Option Agreement with the Applicant and adjacent land where Hornsea Three has entered into option agreements with third party landowners.</p> <p data-bbox="670 422 1279 726">Whilst Part 1 of Schedule 16 to the draft DCO includes provisions preventing the acquisition of statutory undertaker apparatus without agreement, it does not restrict the extinguishment or suspension of property rights that are held for the benefit of Hornsea Three. Similarly, it does not contain provisions to deal with overlapping compulsory acquisition powers.</p> <p data-bbox="670 741 1279 1010">In light of above, Hornsea Three requires bespoke protective provisions and/or a side agreement to be put in place to enable the two projects to co-exist and to ensure that there is no impediment to the commissioning and operation of the Hornsea Three Offshore Wind Farm and no serious detriment is caused to Hornsea Three's undertaking.</p> <p data-bbox="670 1024 1279 1329">Hornsea Three and the Applicant are already in discussions on this point and Hornsea Three is confident that agreement can be reached prior to the end of the Examination. In the unlikely event that agreement is not reached, Hornsea Three will submit its preferred drafting for protective provisions to be included in the DCO towards the end of the Examination.</p> <p data-bbox="670 1344 1279 1572">Hornsea Three requests that this letter is accepted by the Examining Authority as an application pursuant to section 102A of the Planning Act 2008 for it to be added as an interested party pursuant to its Category 2 interest in the above listed plots under s102 of the Planning Act 2008.</p>	<p data-bbox="1308 1602 2849 1923">The Applicant updated the Construction Traffic Management Plan at Deadline 3 to clarify engagement arrangements with Royal Mail. The document has been updated subsequently and the relevant text is in Section 5.8.6 of 7.3 Outline Construction Traffic Management Plan [Revision D] which states that the Applicant will use reasonable endeavours to inform other relevant stakeholders (such as Royal Mail or Blue Light Services) of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest possible opportunity. Royal Mail is also listed as a stakeholder in Section 5.3.16 that the Applicant will work with to ensure disruption caused by AIL deliveries is minimised. The Applicant will utilise the Permit Scheme as set out in Section 2.4 of the CTMP and engagement with stakeholders will be undertaken as part of this. It is also anticipated that this information will be publicly available on the Project website and the relevant Local Highway Authority's website. This would</p>

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		<p>affecting the public highway, its capacity or journey times is usually the key to enable Royal Mail to manage impacts on its operations and business. To this end Royal Mail requires full commitment to advanced notification of works affecting the highway by National Grid or its contractors.</p> <p>Royal Mail supports Norwich to Tilbury and does not wish to stop or delay the construction works for this important infrastructure project from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public in accordance with its statutory obligations.</p> <p>Royal Mail welcomes the references within the Outline Construction Traffic Management Plan dated April 2026 at paragraphs 5.3.14 and 5.3.15. Also at paragraph 5.8.5:</p> <p>However, these provisions do not go far enough to meet the mitigations that Royal Mail requested in its s42 consultation response in July 2024 and s56 relevant representation submitted in November 2025.</p> <p>To re-iterate, in order to adequately protect Royal Mail's interests, it is requested that the Construction Traffic Management Plan includes the following mitigations, which if included would address Royal Mail's concerns:</p> <ol style="list-style-type: none"> 1. a requirement that during the construction phase Royal Mail is notified by National Grid or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; 2. where road closures / diversions are proposed, National Grid or its contractors should be required to liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible; and 3. a mechanism that informs Royal Mail about any other works affecting the local highways network (having regard in particular to the above identified operational Royal Mail sites in the area surrounding the proposed new electricity transmission line). 	<p>include information on road closures, traffic management, temporary speed restrictions, and information on planned AIL movements.</p>

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REP4-373	Suffolk Wildlife Trust	<p>Waveney and Little Ouse Landscape Recovery Project (WaLOR)</p> <p>Suffolk Wildlife Trust seek to secure commitment through the DCO that, as stated in Document: 8.8.1 Applicant's Comments on Written Representations, "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." We have discussed this further with National Grid and their consultants and explained our view that the wording above is not sufficiently strong to guarantee that the Main Works Contractor(s) will engage with the WaLOR project team during detailed design development, to avoid any potential for conflicts between the two projects. The planned river and floodplain restoration works in this location are critical components of the WaLOR project's implementation agreement with DEFRA and it is essential that the detailed design and construction work carried out as part of the Norwich to Tilbury scheme does not compromise the delivery of these restoration works. In particular, the undergrounding of the 11kV and 33kV lines in the floodplain must achieve sufficient depth at points where the lines will cross the restored river channel. It is our understanding that the wording in the OLEMP will be strengthened to ensure that 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.</p>	<p>The Applicant acknowledges the importance of continuing communication with the WaLOR project team throughout the detailed design and construction phase of the Project. The Applicant is committed to working with the WaLOR project team to ensure successful delivery of both projects. 7.4 Outline Landscape and Ecological Management Plan [Revision E] has been updated to strengthen the wording around engagement between the Applicant's Main Works Contractor and the WaLOR project team.</p>
REP4-373	Suffolk Wildlife Trust	<p>Waveney Valley Crossing – bird diverters</p> <p>Suffolk Wildlife Trust remain concerned regarding the lack of bird diverters located above and to the south of the River Waveney, which may be used as a nighttime navigational aid by birds, including those susceptible to collision with electricity infrastructure. We have discussed these concerns with members of the National Grid Project Team and await</p>	<p>This matter has been raised in the ExA's second written questions (ExQ2) under Question BIO2.10. The Applicant has responded to that question in 8.9.2 Applicant's Responses to Second Written Questions [Revision A] also submitted at Deadline 5 and refers to that response.</p>

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		<p>further discussion. The Figure below, taken from National Grid's Norwich to Tilbury Interactive Map (2025 DCO Version, pylon route in purple with pylons RG087 and RG088 labelled), shows in green the area where diverters are currently proposed, with the area of concern to Suffolk Wildlife Trust in orange. [See REP4-373 for image]</p> <p>Our rationale for this is that there is a degree of uncertainty around the line of flight that birds will take, notably when moving east to west up the Waveney Valley (denoted with a black arrow in the above figure). In this instance, birds may not head north towards Roydon Fen following the main channel but may continue along a smaller channel which runs to the south of Pylon RG088 (and forms the Norfolk / Suffolk boundary). If this precautionary approach is not undertaken, then we consider that some post-construction monitoring would be prudent to confirm that any increase in collision risk will not in fact have significant adverse impacts on future bird populations that may be affected. While monitoring of collisions is known to be difficult, the monitoring of birds at risk within the valley is entirely possible and would allow the threat or risk to be assessed (and therefore whether additional mitigation should be considered or would be required).</p>	
REP4-373	Suffolk Wildlife Trust	<p>County Wildlife Sites (CWS)</p> <p>Suffolk Wildlife Trust ask that the Applicant considers the use of green hay, as a means of acquiring seed of local provenance for grassland restoration on CWS, as the preferred means of restoration (where green hay is available) on grassland CWSs. We have discussed this further with the Applicant and are happy to share details of the Suffolk Green Hay register at an appropriate time.</p>	<p>5.9.18 Draft Statement of Common Ground - Suffolk Wildlife Trust [REP4-091] submitted at Deadline 4, describes the matters under consideration between the parties at that stage, including the potential use of green hay for grassland restoration. This request was discussed at the meeting held on 1 May 2026 between the Applicant and Suffolk Wildlife Trust. Where available and practicable, the Applicant has agreed to the use of green hay as a potential means of acquiring seed of local provenance for grassland restoration within County Wildlife Sites, which will be included in the next update of 7.4 Outline Landscape and Ecological Management Plan [Revision E] submitted at Deadline 5.</p>
REP4-373	Suffolk Wildlife Trust	<p>Biodiversity Net Gain – Watercourse Enhancement</p> <p>The Applicant's response to our concerns regarding the removal of invasive non-native species (INNS) as a means of enhancing watercourses to deliver Biodiversity Net Gain confirms that the intention is to implement a</p>	<p>The Applicant confirms that watercourses to be enhanced as part of the BNG mitigation (including all re-instated priority watercourses) will be monitored/ managed for five-years following the completion of reinstatement works as included within 7.1 Biodiversity Net Gain Report [APP-299] and 7.4 Outline Landscape and Ecological Management Plan [Revision E]. Procedures to enhance priority watercourses will be dependent on the specific watercourse to be enhanced and will include the removal of invasive species, where relevant. The five-year aftercare period will include inspections by a suitably qualified person to undertake one or more management activities relevant to the specific watercourse, this includes checking and treating any invasive species (mainly Himalayan</p>

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		<p>five-year monitoring and management plan. We understand that on-site watercourse measures including INNS removal will seek to ensure that baseline conditions are re-established to achieve no-net-loss (NNL) in Watercourse Biodiversity Net Gain, and that sufficient additional off-site Watercourse BNG Units will be purchased to take the scheme for NNL to at least 10% BNG for this habitat type. Notwithstanding our comments and recommendations in relation to the establishment and operation of the proposed Ecology Working Group, we would be satisfied with this approach and seek confirmation from the Applicant that this understanding is correct.</p>	<p>balsam) that may be identified through the routine inspections. As outlined within 7.1 Biodiversity Net Gain Report [APP-299] it is expected that for watercourses, >10% BNG will be achieved on-site. No additional off-site watercourse units are expected to be required.</p>
REP4-373	Suffolk Wildlife Trust	<p>Ecology Working Group</p> <p>Suffolk Wildlife Trust believe the role of an Ecology Working Group must be strengthened within the DCO so that it is a consulted group which 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). We will be providing as a separate document a Proposed DCO Requirement for an Ecology Working Group for Norwich to Tilbury as part of our submission documents and urge this to be used as a blueprint for the group. We have shared a draft of this document with the Applicant. Suffolk Wildlife Trust understand that there is no requirement to monitor the bat flyways during construction or when reinstated habitats are developing as part of this Project but welcome the Applicant's willingness to discuss a monitoring programme which sits outside the DCO process; we believe that such a programme should sit under the remit of the Ecology Working Group.</p>	<p>As stated in response to question DCO 1.S5 in 8.9.2 Applicant's Responses to Second Written Questions [Revision A], 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's suggested text within paragraph 2.3.1 of [REP1-278].</p> <p>Should Suffolk Wildlife Trust wish to pursue a monitoring or research study, the Applicant would be willing to discuss this outside of the DCO process.</p>
REP4-373	Suffolk Wildlife Trust	<p>Additional Comment</p> <p>Suffolk Wildlife Trust note that the Local Impact Report submitted by South Norfolk District Council includes an objection to the proposal by the Applicant for a proposed 28-day period for discharge of condition (including ecology condition). We support the proposed</p>	<p>The Applicant has had regard to feedback received from host authorities on the duration of the decision period and has updated 3.1 Draft Development Consent Order [Revision E] to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on The National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays.</p> <p>The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical</p>

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		8-week/ 56-day day minimum period alternative proposed by South Norfolk Council.	importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report ⁹ identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
REP4-377	Thornbush Energy Limited and H&I Godbold Limited	Duplicate of REP4-378	The Applicant has identified that [REP4-377] labelled as ' <i>Comments on any further information or submissions received by deadline 3</i> ' is a duplicate of [REP4-378] which is post-hearing submissions made by Thornbush Energy Limited and H&I Godbold Limited. The Applicant therefore refers to its response to [REP4-378] in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A] .
REP4-383	Alexandra Camilla Macadam	<p>South of the proposed Babergh pylons is part of the setting of Dedham Natural Landscape. The ridgeline is elevated land (Pylon 27 is 49 metres AOD (Above Ordnance Datum) and the point in the compound where the cable goes underground is 47 metres). Why not T pylons to mitigate harm to the landscape setting, as at Hinkley outside the AONB.</p> <p>Lattice pylons impact significantly on the setting of [redacted], and can be easily seen from the churchyard and Tithe Barn, all historic sites.</p> <p>The email I received on the 8th April 2026 [see REP4-383] says the National Grid are required to use lowest-cost option that is acceptable. Under the 1979 Ancient Monuments and Archaeological Areas Act quote 'Any proposed change (to the monument or its setting) must be fully and explicitly justified. The monument at [redacted] provides a material record of history.</p> <p>Savills Land Agents have submitted an alternative route north of Brimlin Wood (which is 400 years old). There is room despite Anglian Water's protective corridor around its water main, to run electricity supply above ground if pylons are sensitively constructed. There are many examples where surface conduits run close. There is 175 metres between Charit Farm and Upper Birches, could this be a possibility? No 527 pylon therefore as the line is straight towards Bramford in line with the Holford Rules.</p>	<p>The Applicant has undertaken a setting study for Dedham Vale National Landscape which is set out in Annex A of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The setting of the National Landscape to the north is shown on Figure A13.5.4 in Annex B. The Wenham Grove CSE compound, where the Project would transition from underground cable to overhead line, is located outside of the identified setting of the National Landscape.</p> <p>The Applicant set out its position on T-pylons at Deadline 3 from page 60 of 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>The Applicant sets out its position on the alternative route north of Brimlin Wood from page 273 of 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070].</p> <p>With regard to the historic environment, the Applicant is confident that the assessment of Wenham Castle (scheduled monument 1003759) and associated listed buildings presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] is proportionate and appropriate. The Assessment has concluded that the asset would experience a direct, permanent minor adverse significance of effect (which is not significant in EIA terms), and a lower less than substantial harm. The Applicant notes that Historic England is in agreement with the Applicant's assessment [REP1-191].</p>

⁹ National Energy System Operator (2025) Clean Power 2030 Annex 2: Networks, connections and network access analysis

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		<p>Consequences of the South Bebergh Pylon line being built: We sell up [redacted]? Result would be a huge loss of tranquillity The Capel St Mary inhabitants (approx. 4000) would lose a vital amenity for recreation. Asset strippers would buy all the best things, breaking up the historic whole site destroying it for future generation. Harm would be substantial At a recent enquiry my husband [redacted] spoke at 10 minutes to 5pm, without any time to hear a reply from the Applicants. Also I had no offer to speak. It was hurried and not fairly allowed time to speak our case. Mr Harris K.C. spoke at least 3 times about the pylon line having to be built as quickly as possible. Is this in the Gunning Principles? Something so major for our family should not feel this way, it has left me in tears many times over the last 4 years. It is a scandal to let a scheduled monument and it's setting be harmed in any way and is NOT acceptable. There is already a clear view of the Bramford to Twinstead pylon line which is 3km away!</p>	
REP4-386	Caroline Homewood	<p>National Grid fails to assess cumulative harm in the Colne Valley, with specific reference to Fordham, and Aldham, including the Ford Street conservation area. Full quoted extracts from the Design Development Reports and Design and Access Statement are included to evidence inconsistencies and omissions. The Colne Valley between Ford Street, Aldham and Fordham is assessed by National Grid as a series of disconnected issues. In reality, it is a single, highly sensitive landscape where multiple harms coincide spatially and visually. National Grid assess harm in isolation and downplay them as "minor" or "localised". The Environmental Statement relies on limited viewpoints and has not fully assessed the landscape and visual impact pylons and cables will have within the Colne Valley on its footpaths, long-distance views and historic landscape character. The failure to assess these effects cumulatively is a fundamental</p>	<p>The Applicant has appropriately applied and considered relevant Policy (including NPS EN-1 2024 and EN-5 2024) and Environmental Impact Assessment (EIA) requirements (and as refined through scoping) for the Project. In the representation, the IP draws conclusions from documents (such as 7.15 Design and Access Statement [REP2-020]) that were produced for different purposes and the Applicant considers the conclusions drawn to be incorrect. The consideration and assessments of individual and cumulative effects are reported in the Environmental Statement. Summaries of the assessments responding to the specific points raised by the IP are provided below.</p> <p>The landscape assessment set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and accompanying appendices recognises that the Colne Valley Slopes Landscape Character Area (LCA) and Colne River Valley Floor LCA are of high sensitivity to the Project. The landscape sensitivity of Great Tey Plateau LCA, within which Aldham is located, is judged to be of medium sensitivity.</p> <p>As stated in response to [REP1-305] on page 157 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] the LVIA concludes there will be significant landscape effects within the Colne Valley and the Great Tey Plateau. Significant visual effects are also reported.</p> <p>In relation to numbers and locations of viewpoints, the Applicant notes that it is important to understand that the judgements presented in the LVIA, as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] are based on first hand observations and professional judgements made during site visits and not on viewpoints and visualisations alone. Field survey work was carried out during multiple visits under differing weather conditions between 2022 and 2025 (in all seasons). Records were made in the form of field notes and photographs. Field survey work included visits to the Order Limits, viewpoints and designated landscapes, and extensive travel around the Study Area to consider likely effects on landscape character and on experiences of views seen from designated landscapes, settlements/communities, and routes. Field work was undertaken during</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
		<p>flaw in the Environmental Statement. It directly conflicts with policy requirements under NPS EN-1 and EN-5 of EIA regulations (cumulative effects requirements) and undermines the justification for the chosen route and infrastructure. The Examining Authority specifically raised this issue in its written questions, but National Grid did not adequately respond in the issue specific hearings.</p> <p>Quoted extract (DAS §4.5.3–4.5.4): “The overhead line crosses the River Colne, passes Ford Street Conservation Area and continues south past Aldham...”</p> <p>Rebuttal: This confirms a single continuous sensitive corridor, yet impacts are not assessed cumulatively.</p>	<p>both summer and winter months to fully understand the maximum level of visibility as part of the landscape and visual baseline.</p> <p>As detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], the Applicant has undertaken an assessment of intra-project cumulative effects (referred to as ‘inter-relationships between aspects’) in accordance with the scope and methodology set out within 6.19 Scoping Report [APP-296] and agreed in 6.20 Scoping Opinion [APP-297]. Intra-project cumulative effects are those which occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development. This includes an assessment of intra-project cumulative effects on common receptors such as users of PRowS, long distance footpaths and cycle routes.</p> <p>As noted in Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], intra-project effects are intrinsic in the assessment presented within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p> <p>The Applicant has cross-checked 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and notes that this issue was not specifically raised by the Examining Authority in the written questions.</p> <p>The Examining Authority Action No. 34 of 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] requests a response to concerns raised about the Colne Valley, which was provided at Deadline 4.</p> <p>The Applicant's position on cumulative impacts on the historic environment has been addressed in 8.17 Response to Rule 17 Letter – Historic Environment [REP4-318], under section Methodology – 1, pages 1-3, but also in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], pages 44-45 as well as in ExQ1 HE 1.8 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074], pages 240-241. In summary, the assessment follows an asset-by-asset approach, with harm identified for each heritage asset individually, including Ford Street Conservation Area. No substantial harm was identified in assessment. Where the significance of assets is informed by wider landscape or spatial relationships, including the Colne Valley, these factors have been taken into account within the individual assessments. The presence of multiple instances of less than substantial harm does not constitute cumulative harm, nor can such harms be aggregated into a higher category.</p> <p>For clarity, cumulative impacts have been assessed in accordance with legislation and guidance, including both intra-project effects (arising from different elements of the Project affecting the same asset) and inter-project effects (arising from other developments). This approach is consistent with Historic England GPA3 (2017)¹⁰ and Historic Environment Planning Practice Guidance (2019)¹¹ which define cumulative effects in terms of multiple impacts on the same asset rather than the number of assets affected. The number of assets affected reflects the scale of the Project, and the overall level of harm is appropriately captured and weighed in the planning balance, without giving rise to materially greater cumulative heritage harm.</p>
REP4-386	Caroline Homewood	<p>Concentration of Harm (DDR 2024 §5.4.139)</p> <p>Quoted extract: “There would be more residential properties within 200m of the alignment... The majority of these are concentrated at Aldham.”</p>	<p>The visual assessment set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and accompanying appendices recognises there will be significant visual effects on the settlement at Aldham. Visual effects on Visual Receptor area (VRA) D7 Fordstreet and Aldham are set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Part 1 of 4 [APP-229]. Significant within approximately 1.5 km are identified, with minor effects elsewhere (from PDF page 181).</p>

¹⁰ Historic England (2017) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

¹¹ Ministry of Housing, Communities and Local Government (2019) Guidance: Historic Environment

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-386	Caroline Homewood	<p>Rebuttal: National Grid acknowledges concentration but fails to assess combined effects on this cluster.</p> <p>Dismissal of Alternatives (DDR 2024 §5.4.137) Quoted extract: "This option would result in a transfer of effects from receptors in Aldham, Fordham and Ford Street..."</p> <p>Rebuttal: This ignores cumulative intensity of harm and treats impacts as interchangeable. It ignores concentration vs dispersion. There is no recognition that intensification of harm in one location equals cumulative harm.</p>	<p>There is no evidence that the alternative would give rise to greater or lesser overall harm, only that effects may be experienced differently spatially. In the absence of clear evidence of materially increased significance, the conclusion that impacts are effectively redistributed, rather than fundamentally exacerbated, remains reasonable and robust.</p> <p>In addition, as detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], the Applicant has undertaken an assessment of intra-project cumulative effects (referred to as 'inter-relationships between aspects') in accordance with the scope and methodology set out within 6.19 Scoping Report [APP-296] and agreed in 6.20 Scoping Opinion [APP-297]. Intra-project cumulative effects are those which occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development.</p>
REP4-386	Caroline Homewood	<p>Colne Valley Description (DDR 2024 §5.4.140) The Colne Valley has not been considered or assessed as a valued landscape system. Quoted extract: "The River Colne valley comprises undulating landform with areas of tree cover and recreational use."</p> <p>Rebuttal: The valley is described but not assessed as a combined ecological, heritage and recreational system. National Grid mentions woodland, floodplain and ecology separately. There is no assessment of the combined effect of habitat fragmentation, tree loss, visual intrusion and recreational degradation. There is no acknowledgement of the Woodland Trust land, the Essex Way, the Roman corridor or Aldham's inclusion in Colchester's draft local plan as a green/blue corridor.</p>	<p>In response to the comment regarding the landscape being assessed as a valued landscape system, judgements on landscape value of the Colne Valley are set out in Tables A29 and A30 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. These judgements are made bearing in mind the overall context of the landscape and visual Study Area. Factors (criteria) considered as part of the assessment of landscape value are noted in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. These include cultural heritage, natural heritage, landscape condition, associations, distinctiveness, recreational, perceptual (scenic and tranquility), and functional. The Colne Valley has been recognised as having medium-high value. This is particularly in recognition of the contribution of natural heritage, distinctiveness, recreational and functional criteria. In terms of combined effects, as detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], the Applicant has undertaken an assessment of intra-project cumulative effects (referred to as 'inter-relationships between aspects') in accordance with the scope and methodology set out within 6.19 Scoping Report [APP-296] and agreed in 6.20 Scoping Opinion [APP-297].</p> <p>The Applicant notes that the community woodland at Fordham and the Essex Way are included in the assessment of the landscape value on page A40 (LCA5: Colne Valley River Slopes) of Annex A of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228], and the Essex Way again on page A41 (LCA4: Colne River Valley Floor).</p> <p>The Colchester City Council Preferred Options Local Plan was published for Regulation 18 Consultation in November 2025. The emerging local plan was published following the submission of the application for development consent. The Applicant notes that Policy GN2: Strategic Green Spaces and Nature Recovery highlights that the Council will support the delivery of large scale strategic open spaces, habitat creation and restoration of wildlife-rich habitats that deliver the strategic opportunities outlined in the Essex Local Nature Recovery Strategy (LNRS). The Council will work with landowners and other stakeholders to support the delivery of the Essex LNRS. Furthermore, the supporting text for Policy GN2 describes how the Roman River corridor nature recovery area is identified in the draft Essex LNRS as a strategic opportunity area for woodland, grassland, freshwater standing water and freshwater river buffers.</p> <p>The Applicant has sought to avoid direct impacts to habitats and features of ecological value. Habitats that are temporarily removed by the Project would be reinstated. New habitats would be created in the Environmental Areas to mitigate for landscape impacts. This habitat creation has taken the LNRS into consideration and sought to integrate existing habitats and features that surround these areas. Purchasing biodiversity units off-site would also deliver green infrastructure, contributing to nature recovery and it is likely that schemes would be chosen that align with the LNRS.</p>

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REP4-386	Caroline Homewood	<p>Constraints at Fordham (DDR 2024 §5.4.144)</p> <p>Quoted extract: "Constraints include floodplain, woodland, utilities and nearby residential properties around Fordham."</p> <p>Rebuttal: Pylon TB050 located next to the Ford Street conservation area is on a flood plain and is underwater in winter every year but this is not referred to. Constraints are listed individually but not assessed cumulatively.</p>	<p>Pylons TB49 to TB51 are located in the catchment of the River Colne and are relatively close to the fringes of the river's floodplain, as defined by Environment Agency modelling and mapping of the 1% annual chance flood event, with an allowance for climate change, but do fall within this zone. The flood extent is illustrated in Figure 1 (Page 15) of Appendix D of the 7.9 Flood Risk Assessment [APP-331]. Should the flooding regime at TB50 mean that the base of the pylon becomes inundated, its footprint at ground level is very small and the pylon would not pose any restriction to the movement of water, also the loss of space for that water would be negligible in the context of the storage available within the floodplain area. As concluded in 7.9 Flood Risk Assessment [APP-331] the findings of which have been agreed with the Environment Agency as detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP4-085], any impact on flood risk would therefore be negligible.</p>
REP4-386	Caroline Homewood	<p>Undergrounding Rejected (DDR 2024 §5.4.145–147)</p> <p>National Grid fails to apply its own Waveney Valley logic to the Colne Valley and provides no explanation why the same combination of factors (and more) in the Colne Valley do not lead to the same conclusion: • Heritage • Valley landscape and topography • Recreation • Residential cluster • Habitats and species • Biodiversity</p> <p>Quoted extract: "The potential effects do not justify the use of underground cable... approximately 2.5km would be required..."</p> <p>Rebuttal: This conclusion is reached without a proper cumulative assessment of visual, heritage and landscape harm and is inconsistent with the Waveney Valley justification. National Grid fails to acknowledge the explicit conflicts with the Holford Rules despite their KC at the specific issue hearing on 29th April 2026 confirming they still apply. National Grid's design choice retains ridge top alignment and does not assess cumulative skyline intrusion and valley-wide visibility. EN-5 requires proper consideration of undergrounding where visual impacts are significant and National Grid have failed to identify the Colne Valley as a high cumulative impact zone and dismissed undergrounding prematurely. Whilst it is accepted that undergrounding comes with its own issues, disruption would be temporary and not the permanent industrial blight that pylons have on the Colne Valley.</p>	<p>The Applicant refers to its response to Action No. 34 of 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. This response explains the approach to routeing and consideration of alternatives through the Colne Valley. In summary, the Applicant maintains its position that the effects associated with the preferred alignment in this location are not sufficient to reverse the clear presumption for the use of overhead lines as set out in EN-1 and EN-5. The location is not within, nor within the setting of, a nationally designated landscape, nor do the levels of effect meet the criteria in paragraph 2.9.23 of EN-5.</p>
REP4-386	Caroline Homewood	<p>8. Failure to assess combined heritage harm</p> <p>National Grid fails to assess the combined</p>	<p>With respect to the Grade II listed bridge on the A1124 in Ford Street, identified by the Respondent as List Entry 1273567, the National Heritage Listing from Historic England locates this structure crossing the River Colne within</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
		<p>heritage harm in the Colne Valley. The Examining Authority has acknowledged that “weighting should be given to harm to multiple assets.” In the villages of Fordham and Aldham, including Ford Street conservation area, there are 64 listed buildings. However, there is no mention in any National Grid assessment of Fordham’s Grade I listed church or Ford Street’s single lane Grade II listed bridge over which hundreds of HGVs and giant infrastructure plan to drive over. National Grid dismisses the significance of the archaeological sites located within the Colne Valley, claiming pylons on valuable archaeological sites would have a “low adverse” and “minor” impact.</p> <p>Rebuttal: National Grid assesses assets individually but fails to assess the combined heritage landscape, the intervisibility across ridge lines, the valley and the conservation area intensifying harm to multiple assets.</p>	<p>the village of Ford Street. The Applicant notes that the proposed Construction Access Strategy for the Project is set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This establishes that, with limited exceptions set out in Table 5.2 of that document, construction traffic for the Project will make use of defined Primary Access Routes (PARs) to travel between the SRN or MRN and proposed site access points. The proposed Primary Access Routes in the vicinity of Ford Street are shown in Sheet 3 of 7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section D [APP-316]. The Applicant emphasises that the Primary Access Routes defined on this plan do not include proposed use of the bridge in Ford Street identified by the Applicant.</p> <p>Additionally, the Applicant confirms that the Grade I listed Church of All Saints in Fordham has been assessed. The Applicant has set out its position in response to Historic England’s Written Representation [REP1-191], in 8.8.1 Applicant’s Comments on Written Representations [REP2-029], page 77. In summary, the Applicant concludes that this asset is only intermittently visible due to screening vegetation and topography, with no views in which the Project appears alongside it, indicating the church is not a dominant feature in the wider landscape and that the existing assessment remains appropriate.</p> <p>The Applicant’s position on cumulative impacts on the historic environment is set out in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300]. In summary, in line with legislation, policy and guidance, the Applicant considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England) does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance.</p> <p>The Applicant’s position regarding the archaeological resource within the Colne Valley is set out in this document in response to REP4-360 and REP4-329.</p>
REP4-386	Caroline Homewood	<p>Consultation Feedback Ignored (DDR 2025 §7.3.1–7.3.2) Quoted extract: “Passing to the west of Aldham, Fordham and Ford Street...” “The alignment to the east is considered appropriate and consistent with policy.”</p> <p>Rebuttal: Feedback identifies cumulative harm, but is dismissed without transparent reasoning.</p>	<p>It is not clear to the Applicant how the selected quotation is evidence of consultation feedback being ignored. However, the Applicant has evidenced how it has taken into account consultation feedback within 5.1 Consultation Report [APP-066].</p>
REP4-386	Caroline Homewood	<p>Evidence from Submissions Residents identify TB046–TB057 as the most impacted corridor, combining: • Heritage assets • Conservation area • Archaeological sites • Recreation including the Essex Way walk • Biodiversity • Habitats and species • Green/blue corridor • Roman River Valley • Colne Valley • Floodplain • Woodland Trust land • Ridge-top pylons</p> <p>Rebuttal: National Grid does not assess this corridor as a single cumulative impact zone.</p>	<p>Regarding the historic environment please see responses to other paragraphs in this representation (REP4-386). As detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], the Applicant has undertaken an assessment of intra-project cumulative effects (referred to as ‘inter-relationships between aspects’) in accordance with the scope and methodology set out within 6.19 Scoping Report [APP-296] and agreed in 6.20 Scoping Opinion [APP-297]. Intra-project cumulative effects are those which occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development.</p> <p>As noted in Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], intra-project effects on common receptors such as biodiversity (habitats and species), landscape and visual receptors, surface water receptors and heritage assets are intrinsic in the assessment presented within the individual environmental topic chapters. No intra-project cumulative effect were assessed for the Essex Way Walk, Woodland Trust Land or ridge-top pylons as they are not common receptors assessed in the Environmental Statement.</p>

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REP4-386	Caroline Homewood	<p>National Grid's own documents acknowledge concentration of receptors, sensitive landscape, and multiple constraints, yet fail to assess them cumulatively. This was brought to National Grid's attention at the start of the consultation and every opportunity since, but has been ignored. This represents a fundamental flaw in the Environmental Statement and undermines the justification for the chosen route and use of pylons. The Examining Authority have identified that National Grid have failed to assess the adverse wide spread cumulative harms that this scheme would have on Fordham, Aldham (inc. Ford St conservation area) and the wider Colne Valley. There are many and they are significant. A diligent assessment of this area at the outset would have shown it is the wrong place for pylons and cables, please hold National Grid to account.</p>	<p>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] by competent experts. This includes an assessment of intra-project cumulative effects, which occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development.</p> <p>The Applicant has not ignored the IP, instead we have drawn attention to the cumulative assessment that has been undertaken with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. In addition, the Applicant disagrees that there are any fundamental flaws in the Environmental Statement, this is evidenced by the Planning Inspectorate stating in their Rule 17 letter in the 17 April that '<i>The ES was considered to be adequate as part of the acceptance process</i>'.</p> <p>As noted in Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], intra-project effects on common receptors including landscape and visual receptors and heritage assets are intrinsic in the assessment presented within the individual environmental topic chapters – some of which are anticipated to be significant.</p>
REP4-386	Caroline Homewood	<p>National Grid fails to adequately assess the impact of the specific issues listed in the Examining Authority's agenda in relation to the Colne Valley. They are widespread and adverse and by way of illustration of the cumulative impact I comment on the location of each of the proposed pylons:</p> <p>Air Quality TB046 No assessment of the impacts on air quality on Fordham All Saints Primary School and children's health</p>	<p>As detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and Table A17.1.1 in 6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282], the Applicant has undertaken an assessment of intra-project cumulative effects (referred to as 'inter-relationships between aspects) in accordance with the scope and methodology set out within 6.19 Scoping Report [APP-296] and agreed in 6.20 Scoping Opinion [APP-297]. Intra-project cumulative effects are those which occur when a resource, receptor or group of receptors are potentially affected by more than one source of direct environmental impact resulting from the same development. Intra-project effects are intrinsic in the assessment presented within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Responses to the specific issues in relation to the Colne Valley are noted in this row and the rows below.</p> <p>Fordham All Saints Primary School is an unnamed sensitive receptor shown on page 15 of 6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area [APP-154]. It is located between the 100 m and 250 m buffer shown in the figure. Construction dust impacts were assessed in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]. With the implementation of dust mitigation set out in 7.2 Outline Code of Construction Practice [Revision E] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [REP4-166] the effect of dust would likely be negligible and not significant.</p> <p>Fordham All Saints Primary School was not included in the assessment of air quality impacts from vehicle emissions as it is not within 200 m of the Affected Road Network (ARN) and is therefore not within the Study Area of the assessment. Impacts on sensitive receptors 200 m beyond the ARN are likely to negligible and not significant.</p> <p>8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] sets out the Applicant's responses provided during the hearing, with the Colne Valley discussed at Action No.8.3p from page 48. The Examining Authority Action No. 34 on page 29 of 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] sets out a further response to points raised in the hearing about the Colne Valley.</p>

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REP4-386	Caroline Homewood	<p>Biodiversity</p> <p>TB048 No assessment of impact on established trees forming part of the Fordham Hall Estate, managed by the Woodland Trust</p> <p>TB049 No assessment of bird strike risk of pylon set on the ridge of a hill with woodland either side and migrating geese</p> <p>TB049 -TB051 No assessment of land included in Colchester's draft local plan as green/blue corridor</p>	<p>The impacts to trees in proximity to pylon TB48 are shown on 7.4 Errata Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan Part 2 [REP4-177] and currently show an area of tree removal. Following detailed design commitment GG14 of 7.2 Outline Code of Construction Practice [Revision E] confirms that relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.</p> <p>TB49 is situated within the viewing arc of the vantage point at Survey Location 12, which was selected to determine collision risk along the River Colne valley. Therefore, bird collision risk, including for migrating geese, has been assessed in this area. This assessment is outlined in 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. The survey results did not highlight this area as being of notable collision concern.</p> <p>The Colchester City Council Preferred Options Local Plan was published for Regulation 18 Consultation in November 2025. The emerging local plan was published following the submission of the application for development consent. A policy assessment is outlined in 8.4.2 Policy Compliance Tracker [REP1-133] (p384) in relation to policy ST2: Environment and the Green Network and Waterways. However, the Applicant notes that Policy GN2: Strategic Green Spaces and Nature Recovery highlights that the Council will support the delivery of large scale strategic open spaces, habitat creation and restoration of wildlife-rich habitats that delivers the strategic opportunities outlined in the Essex Local Nature Recovery Strategy (LNRS). The Council will work with landowners and other stakeholders to support the delivery of the Essex LNRS. Furthermore, the supporting text for Policy GN2 describes how the Roman River corridor nature recovery area is identified in the draft Essex LNRS as a strategic opportunity area for woodland, grassland, freshwater standing water and freshwater river buffers.</p> <p>The Applicant has sought to avoid direct impacts to habitats and features of ecological value. Habitats that are temporarily removed by the Project would be reinstated. New habitats would be created in the Environmental Areas to mitigate for landscape impacts. This habitat creation has taken the LNRS into consideration and sought to integrate existing habitats and features that surround these areas. Purchasing biodiversity units off-site would also deliver green infrastructure, contributing to nature recovery and it is likely that schemes would be chosen that align with the LNRS.</p>
REP4-386	Caroline Homewood	<p>Design</p> <p>Colne Valley - No transparent assessment of alternatives or applying Waveney justification</p>	<p>Please refer to response provided in rows above for REP4-386 above regarding the Colne Valley.</p>
REP4-386	Caroline Homewood	<p>Flood risk</p> <p>TB049 – TB051 Flood plain acknowledge, but disregarded.</p> <p>TB050 on land that floods every winter</p>	<p>Pylons TB49 to TB51 are located in the catchment of the River Colne and are relatively close to the fringes of the river's floodplain, as defined by Environment Agency modelling and mapping of the 1% annual chance flood event, with an allowance for climate change, but do fall within this zone. The flood extent is illustrated in Figure 1 (Page 15) of Appendix D of 7.9 Flood Risk Assessment [APP-331]. Should the flooding regime at TB50 mean that the base of the pylon becomes inundated, its footprint at ground level is very small and the pylon would not pose any restriction to the movement of water, also the loss of space for that water would be negligible in the context of the storage available within the floodplain area. As concluded in 7.9 Flood Risk Assessment [APP-331] the findings of which have been agreed with the Environment Agency, as detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP4-085], any impact on flood risk would therefore be negligible.</p>
REP4-386	Caroline Homewood	<p>Health & wellbeing</p> <p>Disregarded - No meaningful assessment of the impact on loss of amenity, landscape, heritage and the effect on local business owners', farmers', residents' mental well being compounded by poor engagement. No assessment of the value of the open recreational green spaces (walking, running,</p>	<p>The assessment of impacts on health and wellbeing is provided in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment has been completed in line with appropriate guidance (e.g. IEMA, WHIASU) and is both proportionate and robust.</p> <p>The assessment highlights that community mental health and wellbeing can be impacted by changes to landscape and visual amenity, and assesses impacts during both the construction and operation phase. It is noted that impacts are likely to be experienced differentially by members of local communities according to factors such as where they live, or their outlook (those living in closest proximity to construction activities, or to Project infrastructure, may be more vulnerable to change). Although there is a link between visual change and health outcomes, this is not</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
		horse riding, cycling) on physical and mental health.	<p>considered to result in a significant change. The assessment of impacts on mental health and wellbeing during the construction phase highlights the importance of community engagement during the pre-commencement and construction phases, providing local communities with mechanisms by which some measure of control may be experienced (a protective factor in mental health and wellbeing).</p> <p>The potential for disruption to recreational routes and areas of open space which may affect opportunities for physical activity and in turn people's physical and mental health during the construction phase has been presented in 6.10 Environmental Chapter 6.10 Health and Wellbeing [APP-192]. The assessment concludes that the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of PRoW) are generally short-term, with rapid reversal / diversions in place and a range of appropriate mitigation and management measures are in place, as set out in documents including 7.6 Outline Public Rights of Way Management Plan [Revision C].</p>
REP4-386	Caroline Homewood	<p>Historic environment</p> <p>TB045 – TB057 In the parishes of Aldham, including the Ford St conservation area and Fordham there are 64 listed buildings (see schedule attached)</p> <p>TB048 – TB052 On top of hills over looking and encircling the Ford Street conservation area that lies on valley floor</p> <p>TB046 Next to Grade I listed Church</p> <p>TB047 On top of Roman Villa described by National Grid as having “low adverse” and “minor” impact</p> <p>TB054 Next to St Margarets Grade II listed Church</p>	<p>TB45 – TB57: The Applicant is confident that the assessment of the historic environment within the parishes of Aldham and Fordham as detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], is proportionate and appropriate within the DCO framework.</p> <p>TB48 – TB52: The assessment of Fordstreet Conservation Area is detailed in the documents noted immediately above. The Applicant notes that Historic England's Written Representation [REP1-191] is in agreement with the Applicant's assessment of Fordstreet Conservation Area.</p> <p>TB46: The Grade I listed Church of All Saints is located over half a kilometre to the north-west of Pylon TB46. The assessment of asset is detailed in the documents noted immediately above. A detailed response by the Applicant with regard to the asset can be found in response to Historic England's Written Representation [REP1-191] in 8.8.1 Applicant's Comments on Written Representations [REP2-209].</p> <p>TB47: Please see response to REP4-329 Matter 2 above in this document.</p> <p>TB54: The Grade II* listed Church of Saint Margaret and Saint Catherine is located over 3km west-south-west of pylon TB54. The assessment of the church is detailed in the documents noted above. The Applicant notes that Historic England's Written Representation [REP1-191] is in agreement with the Applicant's assessment of the church.</p>
REP4-386	Caroline Homewood	<p>Landscape</p> <p>Colne Valley Disregards the Holford rules</p> <p>No assessment of the topography of the Colne Valley or mitigation for hill tops and limited shielding</p> <p>Aldham, forms part of the Roman River Valley and the Colne Valley and the Ford Street conservation area is on the valley floor</p> <p>Colne Valley considered a valued landscape with North Essex by the local community and was formerly designated a Special Landscape Area in earlier Development Plans</p>	<p>8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] sets out the Applicant's responses provided during the hearing, with the Colne Valley discussed at Action No. 8.3p from page 48.</p> <p>The Examining Authority Action No. 34 on page 29 of 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] sets out a further response to points raised in the hearing about the Colne Valley. The Applicant's response notes that the Holford Rules, amongst other factors, are used to inform decision making, and that in practical terms it is not possible to be compliant with all the Holford Rules, and a balance needs to be achieved. The rules take into account the differing characteristics of the landscape, including the topography. In Section D of the Project close to Fordham, Fordstreet, Aldham and the Colne Valley, characteristics and attributes including topography have been taken into account. These are further discussed in the response.</p> <p>Topography forms part of the considerations within the landscape and visual assessment as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and its accompanying appendices.</p> <p>REP1-305 on page 157 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] signposts the IP to the relevant parts of the assessment.</p> <p>Aldham, the Roman River Valley, the Colne Valley and Fordstreet Conservation Area are all considered within the assessment set out above. REP1-305 on page 157 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] signposts the IP to the relevant parts of the assessment.</p>

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REP4-386	Caroline Homewood	Public Rights of Way Colne Valley Construction will close 8 of 19 of the public rights of way, including the Colne Valley Way, amounting to 7km. All will suffer lasting visual harm.	<p>REP1-164 on page 9 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] provides the Applicant's response to the Colne Value being considered as a valued landscape.</p> <p>The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [Revision C], is to maintain access along PRowS at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions.</p> <p>The Applicant notes that it believes this comment relates to the Colne Valley Path (not Colne Valley Way). Notwithstanding this, while the comment does not identify the specific PRowS of concern, the Applicant confirms that no PRow within the vicinity of Fordham, Ford Street or Aldham would be closed without a diversion in place, including the Colne Valley Path and Colne Valley Way, and no severance of the overall network is anticipated.</p> <p>Where temporary diversions are required, they have been proposed along the shortest practicable route, taking account of existing land boundaries and features. Diversions are expected to be largely similar in character to existing PRowS and, in most cases, will be required only for limited durations associated with specific construction activities.</p> <p>PRow users will therefore be able to continue to access the network throughout the construction period. Following completion of the works, all PRowS temporarily affected will be reinstated to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre and post-construction condition surveys. Visual effects on recreational users of PRow are assessed within the landscape and visual assessment as set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and its accompanying appendices. REP1-305 on page 157 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] signposts the IP to the relevant parts of the assessment.</p>
REP4-386	Caroline Homewood	Socio-economics TB046 & TB049 No assessment of impacts on heritage-based hospitality businesses like the Shoulder of Mutton and Three Horseshoes, both listed properties that rely on the heritage, rural landscape and amenity values of this area.	<p>An assessment of effects on visual receptors within Fordstreet and Fordham is provided under Visual Receptor Area (VRA) D5 Fordham (paragraphs 13.7.52 to 13.7.63) in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Significant effects are identified within approximately 1.5 km of the Project, including from parts of Fordstreet and Fordham. Viewpoint 4.24: Essex Way near Fordstreet is located near the Shoulder of Mutton and a significant effect on visual receptors is identified as set out on page 67 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]. Viewpoint 4.08: Fordham is located near the Three Horseshoes and a significant effect on visual receptors is identified as set out on page 20 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231].</p>
REP4-386	Caroline Homewood	Transport Colne Valley No credible assessment of how our narrow rural roads will deal with hundreds of HGVs daily and giant infrastructure passing over the single lane listed bridge in Ford Street.	<p>The proposed Primary Access Routes in the vicinity of Ford Street is the A1124 Halstead Road from the A14 to the site access points on Fordstreet Hill, as shown in Sheet 3 of 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section D [APP-316]. The Primary Access Routes defined on this plan do not include proposed usage of Ford Street or the bridge in Ford Street.</p> <p>The proposed Construction Access Strategy for the Project is set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This establishes that, with limited exceptions set out in Table 5.2 of that document, construction traffic for the Project will make use of defined Primary Access Routes (PARs) to travel between the SRN or MRN and proposed site access points. The Applicant has assessed the significance of residual construction effects on driver/public transport delay, pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation, pedestrian delay and road safety on Primary Access Routes (PAR) within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275].</p> <p>PAR The Applicant has assessed the significance of residual construction effects on driver/public transport delay, pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation, pedestrian delay and road safety on Primary Access Routes (PAR) within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275].</p>

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REP4-386	Caroline Homewood	Schedule of listed buildings Schedule of Deficiencies – National Grid Assessment (Colne Valley Section)	These schedules are noted and their content responded to above.
REP4-388	Charlotte Louise Randall Banks	Heritage We live in a heritage asset - Grade II listed, original building built in the 11C, Hempnalls Hall, in Cotton. It will be impacted as one of the many 8,800 plus houses, impacted by The Applicant. We have never had anyone from National Grid come around to see how the house and its surrounding experience and setting will be affected by the proposed pylon route and, the route has not changed since their first map that was made public which can only suggest that the Applicant has not listened to the many people of Cotton or anywhere about the impact on the heritage assets. I suspect that the applicant has surmised that the impact on Hempnalls Hall is less than harmful - what do they base this on? We will have pylons within 500m of the house disturbing a view that has not changed for 600 years. We will have disruption whilst the haul roads are being built and eventually when the project is finished, we will have 50m pylons industrialising a historic landscape. The National Policy clearly states that any infrastructure harm to assets and their settings must be justified. It seems that the route was probably compiled by a computer and no one from National Grid has been to see Hempnalls Hall despite being invited by me many times, this has not been thoroughly justified as we seem to be a pin prick on a map. The historic deer parks that will be ruined cannot be seen by a computer although they can be seen from google earth. The deer parks were commissioned by the crown in 1440. The deer are still present. Historic England guidelines state that indirect harm to settings must be assessed and justified as infrastructure can alter the way heritage is experienced. The pylon route will certainly alter the way this house is experienced and having a foot path that runs directly opposite a proposed pylons RG127 - RG131 will only underline that experience for the worst. Mid-Suffolk District Council considers "this area has an open and flat landscape, and further	<p>The Applicant's position with regard Hempnalls Hall has previously been set out in response to REP1-313 in 8.8.1 Applicant's Comments on Written Representations [REP2-029], which set out the assessment conclusions and considered the report undertaken by Historic England (HE) and provided by the Interested Party.</p> <p>Additionally, the assessment of the deer park can be found in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].</p> <p>The historic environment assessment was undertaken using both desk-based sources and site visits, in the case of Hempnalls Hall this was undertaken from the surrounding PRow.</p> <p>In conclusion, The HE report concludes the Project would result in less than substantial harm to Hempnalls Hall (1180451), which aligns with the conclusions of the Project's assessment. There is agreement that the Project would not result in substantial harm this designated heritage asset.</p>

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REP4-388	Charlotte Louise Randall Banks	<p data-bbox="670 1604 765 1631">Traffic</p> <p data-bbox="670 1646 1279 1913">Cotton is a small village with one road in and one road out. How can the haul roads not delay and disturb residents in this village, the impact on this village will be horrendous. We are a village of single track lanes not built for large HGV lorries carrying steel and other building materials. We have 15 pylons proposed for cotton. We have been told very</p>	<p data-bbox="1308 1604 2843 1913">The proposed Construction Access Strategy for the Project is set out within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision D]. This establishes that with limited exceptions set out in Table 5.2 of that document, construction traffic for the Project will make use of defined Primary Access Routes (PARs) to travel between the SRN or MRN and proposed site access points. The proposed Primary Access Routes in the vicinity of Cotton are shown in Sheets 5 and 6 of 7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section B [APP-314]. No local roads in the vicinity of Cotton are proposed for use as Primary Access Routes. Construction HGVs not following the construction routing strategy is defined as a matter of non-compliance in 7.3 Outline Construction Traffic Management Plan [Revision D], and will be subject to the enforcement procedure detailed in Section 6.4.</p>

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		<p>little about the haul roads except that they will be around 8m wide. Roads will need to be built and removed, farmers' fields will be ruined. A calculation, not done by me, prepared by a farmer, suggests 1320 lorry loads of hardcore, cement and steel would have to be used to build in just this village, the haul roads alone. The Applicant will need lorries to bring steel, bring scaffolding, bring hardcore, bring cement. Is this green? HVDC has a much better carbon footprint - why has this not been given to us as an option?</p>	<p>The Applicant has considered the appropriate means for access to the pylons for construction purposes and established that the use of haul roads was preferred to the alternative of more dispersed movement of HGVs on minor roads. This approach ensures that HGVs remain on suitable roads. This was set out in Section 6.2 of 7.21 2024 - Design Development Report [APP-359].</p> <p>The Applicant has considered the use of HVDC as the technology for the Project in 7.19 2023 - Strategic Options Backcheck and Review [APP-357].</p>
REP4-388	Charlotte Louise Randall Banks	<p>Mental health</p> <p>This project has loomed over us like a dark cloud for the last three years. We are unable to sell our house and therefore are unable to move on in life as we should be able to. The lack of sale and regular reduction in price causes for the future as this house is our pension and we will not receive its true value thanks to the Applicant. There is no compensation to be had. This is outrageous! This project causes severe sadness that this beautiful area will be spoiled forever. I cry often about the unjustness of it all. Also, no one has given me concrete evidence that this will not happen. The of the .</p>	<p>The Applicant acknowledges the strength of feeling expressed in this representation and the anxiety caused as a result of uncertainty. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication, enabling concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</p> <p>The representation specifically references uncertainty in relation to the saleability of this home. The evidence reviewed by the Applicant indicates that property values are influenced by a wide range of economic, market and property-specific factors, making it difficult to attribute changes in value or saleability to any single cause. The Applicant acknowledges that it is understandable to have concerns about property values regarding new infrastructure proposals near homes, there is no evidence of long-term impact to property market values. The Beaully-Denny 2024 report commissioned by Scottish renewables and conducted by BiGGAR Economics (see 8.9.1.2 Addendum to ExQ1 SET 1.2, SET 1.3, SET 1.6 [REP4-308]) focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices.</p> <p>The Applicant's position is that potential effects on property prices are not a material planning consideration for the purposes of determining the DCO application. The Environmental Statement contains the assessment of the likely significant environmental effects of the Project and does not identify significant effects on house prices because of the Project. More generally, the evidence before the Examination does not demonstrate a generalised long-term reduction in property values arising from overhead line infrastructure.</p> <p>The Applicant accepts that this will not provide the certainty to the sale of individual property. No Applicant can give a guarantee as to the future sale price or marketability of any individual home, because those matters depend on a range of factors including location, timing, buyer appetite, wider mortgage conditions and general market circumstances. The Applicant's case is not that impacts can never be alleged by individual homeowners, but that the evidence does not establish a basis for concluding that the Project will deprive a property's 'true value'.</p>
REP4-390	Douglas Robert Wade	<p>I am writing as a resident of Offton, Suffolk, to formally object to the proposed Norwich to Tilbury overhead pylon route and to express the deep concern, distress, and frustration felt throughout our community regarding the devastating impact this project will have on our village and surrounding countryside. The proposed development will irreversibly</p>	<p>The Applicant acknowledges the concerns raised. The Applicant has responded to these points as raised previously, most notably from page 15 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] and page 90 of 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]. These responses set out how the environmental effects on Offton have been assessed by the Applicant and the measures proposed to manage construction, including construction traffic.</p>

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REP4-390	Douglas Robert Wade	<p>damage the historic and rural character of Offton. The plans include enormous 50-metre-high overhead pylons that will effectively split our village in two, together with two proposed 125m x 75m construction 'compounds' on prime agricultural farmland along Offton Road and Holly Road (both registered 'green lanes' themselves). These compounds are planned only metres away from ancient woodland, historic landscapes, public footpaths, and bridleways that are heavily valued and used by residents and visitors alike. The impact on the landscape, biodiversity, agriculture, heritage, and daily life of villagers will be severe and long-lasting. Construction traffic is proposed to use narrow rural roads and green lanes never designed for industrial-scale activity, with the potential to block village access and exit routes entirely. This poses serious concerns not only for residents but also for emergency access, farming operations, and public safety.</p> <p>Most concerning is the apparent failure by National Grid to properly and transparently evaluate less destructive alternatives. National Grid's own documentation the comparison is made in the Landscape and Visual Impact Assessment (Chapter 13) of the Environmental Statement for the Norwich to Tilbury where a particular Landscape Character Type (LCT) would experience likely significant adverse effects. National Grid identifies the landscape surrounding Offton as an area that will experience one of the highest levels of significant adverse impact from the Norwich to Tilbury infrastructure proposals. Only one other location has been identified at a comparable level of severity — Dedham Vale. However, despite the comparable level of acknowledged harm, the mitigation approach differs fundamentally. In Dedham Vale, undergrounding is proposed to reduce damage to the landscape, heritage, and community value. In Offton, despite facing similarly severe impacts, the proposal remains large-scale overhead pylons. This inconsistency raises serious concerns regarding fairness, proportionality, and transparency in the decision making process. If one community is considered worthy of</p>	<p>The Applicant has responded to these points as raised previously, most notably from page 15 of 8.8.1 Applicant's Comments on Written Representations [REP2-029] and page 90 of 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]. In summary the Applicant's position is that the Offton area is not a nationally designated landscape and is therefore not comparable in policy terms to Dedham Vale in the application of NPS EN-1 (2024) and NPS EN-5 (2024), in which the strong starting presumption for the use of overhead lines is reversed where the connection unavoidably crosses nationally designated landscapes.</p>

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REP4-390	Douglas Robert Wade	<p>underground mitigation due to landscape and heritage sensitivity, why is Offton not being afforded the same protection?</p> <p>Our community is not opposing the national need to improve energy infrastructure or support renewable energy transmission. We understand the importance of modernising the electricity network. However, we strongly object to the continued reliance on outdated overhead transmission infrastructure where modern and less destructive alternatives exist. It is deeply concerning that a 21st-century energy challenge is being addressed using infrastructure technology developed generations ago, despite advances in underground cabling and HVDC solutions. Undergrounding the cables — particularly through Offton and its surrounding farmland — represents a far more responsible, sustainable, and community-conscious solution. Residents have repeatedly asked National Grid to explain the logic behind this contradictory approach, yet no satisfactory answer has been provided.</p>	<p>The Applicant has responded to these points as raised previously, most notably from page 15 of 8.8.1 Applicant's Comments on Written Representations [REP2-029]. In summary, the preferred strategic option for the Project is an AC onshore connection. This is the preferred strategic option because it best aligns with National Grid's statutory obligations under Section 9 of the Electricity Act 1989, and is supported by national government policies, including NPS EN-1 and EN-5.</p>
REP4-390	Douglas Robert Wade	<p>A further major concern that has continually been overlooked, minimised, or ignored entirely by National Grid and associated agencies is the serious and increased aviation safety risk posed by the proposed pylons due to their close proximity to RAF Wattisham. RAF Wattisham is located less than a mile from parts of the proposed route and is an active military airbase and helicopter training facility operating throughout the year. The area surrounding Offton, Ringshall, and Barking Tye experiences frequent low-flying helicopter activity 365 days a year, often at very low altitude as part of operational and training exercises. I can provide photographic and film evidence of this. Introducing multiple 50-metre-high overhead pylons into this established low-flying environment significantly increases the risk of a catastrophic accident. These structures would create dangerous new aerial obstacles within an area already heavily used by military aircraft. Residents are deeply concerned not only for the safety of RAF personnel, but also for the neighbouring</p>	<p>8.3.39 Draft Statement of Common Ground – MOD DIO [Revision B] details the Applicant's consultation and engagement with the Defence Infrastructure Organisation (DIO) as the Ministry of Defence (MOD) representative on UK planning and energy consenting matters. The Statement of Common Ground recognises the potential for the Project to impact military aviation (including at Wattisham Station as well as within Low Flying Areas), the MOD's responsibilities for undertaking impact assessments in relation to their assets, with their conclusions, and the ongoing discussion and agreement of appropriate mitigation measures between the relevant parties to enable the MOD to confirm the Project is acceptable.</p>

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		<p>villages directly beneath these flight paths. The consequences of even a single helicopter collision involving this infrastructure could be devastating, with potentially fatal outcomes for aircrew and civilians alike. This concern has repeatedly been raised by residents and local representatives, yet it appears to have been continually brushed aside without proper public explanation or transparent assessment. It is unacceptable that such a serious public safety issue appears to have received insufficient scrutiny during the planning and consultation process. Before any approval is considered, there must be a full, independent, and publicly transparent assessment of the aviation risks associated with constructing large-scale overhead pylons so close to RAF Wattisham and its low-flying helicopter operations. Residents of Offton, Ringshall, and Barking Tye should not be expected to live beneath infrastructure that could materially increase the risk of a fatal aviation incident.</p>	
REP4-395	Grace Aitken	<p>I feel using land for these pylons is not in anybody's best interest. Will cause havoc to our wildlife and are a real eyesore. The government is doing the same with solar farms using arable land we might need in the future. More so now with America and Israel holding the world to ransom. I also feel there is a lot of greed in these ideas energy companies making a fortune and never passing it on to the public. Lining their own and shareholders pockets</p>	<p>The Applicant acknowledges the objection to the Project. National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The Applicant provides a summary of the planning balance in Chapter 8 of 5.6 Planning Statement [APP-085] which, following a detailed assessment of the Project and its likely effects, concludes that the Project is in accordance with the National Policy Statement EN-1 and EN-5 framework.</p>
REP4-406	Karl Owen	<p>Person with Protected Characteristics in our Home</p> <p>When the project leader visited our home and made changes to the route that was part of the Suffolk 3 route change from the 2024 alignment it was because there is a person with Protected Characteristics living here. The haulage road was moved from outside our front door, however the pylon RG138 was actually moved closer to our property. How can this be, I thought people with protected characteristics were supposed to be protected, it's in the name! I ask the examining authority to move the pylons and the intrusive construction with its noise and vast numbers of</p>	<p>The Applicant does not agree with the reported change in distance as both RG138 in its position in the application and at the Statutory Consultation are approximately 158 m from the property. At the meeting on site with two members of the Project team, the concern expressed was proximity to planned accommodation at the eastern end of the garden and the crossing of the route across the main southerly aspect. The separation from the alignment to that accommodation has been increased and the alignment repositioned to the side of the view which at the time was discussed as a beneficial change if it could be achieved.</p> <p>An assessment of the impacts of noise during construction activities is provided in Volume 6.14 of the Environmental Statement [APP-256], and Appendices 14.1 - Construction Noise and Vibration Data [APP-257] and 14.2 - Construction Traffic Noise Assessment [APP-258] to Chapter 14. Construction activities will be required to be completed such that noise levels agreed with the local authority (based on established British Standards and relevant legislation such as the Control of Pollution Act 1974) are not exceeded.</p>

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		<p>strangers to be moved further west from our home to protect the person with protected characteristics who has stated that they will not be able to cope. I am extremely concerned for the personal safety of this person as the stress on their emotional wellbeing will be catastrophic and life threatening. It appears that the applicant could care less. Surely this is something that the planning Inspectorate should act on</p>	<p>Operational construction sites and access routes will be protected by temporary security fencing, and staff will arrive at and depart from these sites from the main construction compounds. The main contractor will be required to establish the means to make contact (via a helpdesk accessible via phone, text, social media, etc) for enquiries or concerns relating to noise-related construction operations and the construction programme.</p> <p>Further measures proposed for the management of noise and vibration associated with construction activities are set out in paragraphs 14.6.5 -14.6.15 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256], which also details how more specific measures can be considered as the detailed construction methodology is developed, to take account of specific local circumstances, including consideration of persons with Protected Characteristics.</p>
REP4-406	Karl Owen	<p>The [redacted] is Heritage Our home is hundreds of years old and yet the applicant refuses to give it heritage status. Before the industrial revolution it was a windmill turning crops into food for your ancestors to eat. That to me speaks of heritage, we still have the old grinding stones that were dug up in the garden and many medieval potsherds lie scattered around the place. This chocolate box cottage has dominated the landscape for centuries, standing alone in the flat, open fields on the highest point of the Suffolk uplands like a monument to a bygone era. The pylons come unacceptably close and do so by the applicant refusing to accept the reality of the cottage's age and history. You will not find the property listed as my father-in-law who holds the deeds to the property as part of his wider farm estate has no truck with that sort of thing.</p>	<p>The Applicant has previously responded to the Interested Party on page 348 in 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]. The Applicant informs that as the house is not captured in the formal sources (or within the defined study area), it has not been assessed, and there are no current plans to assess it. The building is outside the Order Limits. The address now supplied has allowed the Applicant to check the assessment and two low value non-designated buildings (2797, 2798) have been recorded in the approximate location of this property. These are outside the Order Limits and were identified by the assessment of historic mapping undertaken for the Project and are not recorded in any other available sources (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]).</p>
REP4-406	Karl Owen	<p>We are Permanent residents in family owned home, Not 'tenants' My wife and I are not merely tenants of [redacted] who can or would simply move and rent somewhere else away from the pylons. We have lived here for thirty years and will be here for the rest of our lives. Not that it should be anyone else's business but we pay a peppercorn rent and have leave from my father-in-law to live here in perpetuity. When we slip this mortal coil our children will continue to live here at The especially our child [redacted], it will always be a base or a place they can return to as will our grandchildren, it will never be sold. As such if the applicant wishes us to live with and host it's pylons carrying six million homes worth electricity right over the top of our forever</p>	<p>As cited in the response above, the Applicant has confirmed that the affected party's home lies outside the Order Limits and there is no potential for any physical impact.</p> <p>The affected party may have a potential Category 3 interest under section 44 of the 2008 Planning Act. A Category 3 interest relates to persons/organisations whose land, whilst not necessarily directly affected by part of the Project may be entitled to make a relevant claim for compensation, if development consent for the Norwich to Tilbury Project is granted, and the DCO is fully implemented.</p> <p>A relevant claim means a claim under:</p> <ul style="list-style-type: none"> • Section 10 of the Compulsory Purchase Act 1965 • Part 1 of the Land Compensation Act 1973 • Section 152(3) of the Planning Act 2008. <p>A land agent/surveyor/legal representative will be able to advise the affected party of their entitlement to make a claim, and their rights as a potential Category 3 interest, in respect of the Planning Act 2008.</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-406	Karl Owen	<p>home then it must compensate us in a way that reflects our unique situation, as we are unable to pick up our home and move it somewhere else. If tenants can receive a five figure sum then I believe we should have a seven figure sum to reflect our unique circumstances. The applicant should recognise and recompense those of us who have to live with this imposition for generations. The leader of the project stood outside our home and stated that "All The Holford Rules are broken here"! I agree that nearby villagers should receive money off their electricity bills for having pylons near to their community, but for those of us who have the overhead lines over our heads and the pylons towering literally over our home we should be properly compensated and that should be a commitment made by the applicant before this proposal is granted approval, not after when they can slime their way out of it</p> <p>The Thickett is Ancient Woodland The Thickett, situated next to RG 141 is an Ancient Woodland. I still see no recognition from the applicant of this fact. Again, as in issue number 2, my father-in-law owns this woodland and has never sort to get it any official recognition, he is an old fashioned farmer, he gets firewood from The Thickett, he doesn't need it registered on some national ledger, he's not that type of guy. That does not negate the reality that The Thickett has been there for millenia as its rich tapestry of flora and fauna will tell any ecologist. I have seen The Thickett, along with Gipping little and Great woods on ancient maps It should be incumbent on the applicant to accept that The Thickett is ancient woodland, which it is, or prove that it is not, surely, not the other way around. I therefore request that the pylons be moved further away from The Thickett. For decades I have been maintaining the upkeep of The Thickett, clearing out fallen trees to allow saplings the space and light to grow, coppicing hazel and monitoring the abundant wildlife, including with trail cameras. A mink was also recently caught on camera demonstrating the diverse and rare wildlife we</p>	<p>The Applicant acknowledges the points raised in relation to the woodland known as The Thickett. With regard to its classification, 'The Thickett' is not included on the Ancient Woodland Inventory, including the most recent updates in July and October 2025. The Applicant has therefore relied on the best available national datasets and survey information in undertaking the assessment presented in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B [AS-026] and when designing the Project's mitigation strategy as presented in 7.4 Outline Landscape and Ecological Management Plan - Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032].</p> <p>Notwithstanding this, The Thickett lies outside the Order Limits. The closest design component is a permanent access track associated with tower RG141, which will make use of existing trackways within adjacent arable land. The overhead line, in its current alignment, is located approximately 50 m from the woodland, with the nearest pylon (RG141) situated over 100 m away. No direct impacts to the woodland are anticipated, including any requirement for vegetation removal to facilitate construction works or for ongoing maintenance to maintain electrical clearances. On this basis, even if classified as ancient woodland, no additional mitigation specific to The Thickett would be required. Despite not being classified as ancient woodland, The Thickett has been considered an important ecological feature due to its broad-leaved woodland habitat. Through careful routeing and siting any impact to the woodland has been avoided.</p> <p>The Thickett is recorded and illustrated as G107 of 7.4 Errata Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan Part 1 [REP4-176]. No tree removal is proposed in this location. Regarding the reported presence of mink, it is noted that American mink is an invasive non-native species in the UK, widely recognised as having a detrimental effect on native wildlife, particularly water vole populations. As such, their presence would not be regarded as an indicator of ecological value requiring specific protection. The Project would continue to comply with relevant legislation, including the Animal Welfare Act 2006; however, no specific mitigation for mink is considered necessary given their status as an invasive non-native species.</p> <p>As set out on page 345 of 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298], the Project will not impede access to The Thickett: <i>'where works intersect existing tracks or access routes, the Applicant's approach is to maintain safe and practicable access, with any short-term</i></p>

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		<p>have here. To be able to properly maintain and manage this habitat and woodland I need access to The Thickett at all times by vehicle. The only access is via a track from Lamberts Lane that enters in the North-East corner. This is completely severed by the pylon alignment and so the applicant needs to allow me permanent access across the construction site. It is also critical that I have access to The Thickett as the firewood I harvest is the only source of heat to keep our non-central heated house warm in the winter.</p> <p>The other feature of The Thickett is its uniquely almost perfect rectangular shape which is unusual in a landscape of irregular fields and woodland. Also it is surrounded by a ditch with a far higher embankment on the inside and has an unusually large number of European Hornbeams, is a mile west of the Roman road the A140, adjacent to the ancient thoroughfare One Hundred Lane, has clear sightlines in all directions, is the highest point of the Suffolk Uplands sits next to the source of the river Gipping and looks down through the Gipping valley. It is also in the very heart of what was the Iceni territory two thousand years ago. It is also exactly 85 yards wide which was the common width that Roman legionnaires built there encampments. Several Roman camps have been discovered in this area including one just down the road at the bottom of the A140. Given all of this strong, collective circumstantial evidence it is almost certainly an undiscovered Roman camp or fort from one of the most iconic times in British history, the rebellion of Boudicca two millennia ago, which should hold national and international significance. Certainly, if you put this evidence to an archaeologist they would bite your hand off to investigate as it would be the archaeological find of the century. I urge the Planning Inspectorate to have this properly investigated before the site is permanently ruined by the applicant.</p>	<p><i>restrictions during construction managed through detailed construction planning. Where necessary, temporary crossings or alternative access arrangements would be provided to ensure continued access during the construction phase.'</i></p>
REP4-406	Karl Owen	<p>Inept Bat Surveys Bat surveys!! What bat surveys!!! I observed a bat survey where two young ecologists peered at an oak tree on Lamberts Lane for five</p>	<p>The respondent appears to have observed the Applicant's ecologists undertaking a Stage 1 ground level tree assessment, following industry best practice guidelines as produced by the Bat Conservation Trust. This ground level tree survey assesses the suitability of each tree to support roosting bats, looking for cracks, crevices and other suitable roosting features. This survey needs to be undertaken in daylight hours so that a full suite of data on the</p>

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		<p>minutes and also in a ditch at 9:30 in the morning. Had they come at half nine that evening there would be a flurry of bats flying up and down Lamberts Lane as I have repeatedly told the applicant for three years. It has reached the point now where it is blatantly obvious that the applicant does not wish to know about bats, skylarks, great crested newts or any other wildlife species and if the examining authority cannot see this then unfortunately you must be wearing blinkers. Despite numerous attempts to inform the applicant of the vast biodiversity in the kilometre north and south of where I have lived and observed for thirty years they have made no effort to properly record this. I note that this behaviour of refusing to properly record the wildlife that will be directly affected by the applicant's proposal is going on across the whole 112 miles of the route. Shameful and. The Planning Inspectorate must get to grips with this diabolical behaviour.</p>	<p>nature of any features can be visually observed and recorded. Further Stage 2 nocturnal surveys/aerial inspections were subsequently undertaken at targeted locations in line with the agreed bat survey scope. Pre-construction bat surveys will also be undertaken on any impacted trees with suitable potential features, in line with details provided within 7.4 Outline Landscape and Ecological Management Plan [Revision E].</p> <p>A full suite of ecology desk-based and field surveys has been undertaken across the Project, in line with industry best practice. The results of these ecology surveys are presented within the baseline section of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the accompanying technical appendices. The assessment undertakes a detailed ecological impact assessment based on this comprehensive ecological baseline.</p>
REP4-406	Karl Owen	<p>Access to National highway from driveway and Access to The Thickett for Firewood/management</p> <p>The issues I have are access to The Thickett to maintain the woodland, manage the wildlife and bring out firewood, the pylon building site entirely cuts across my access route from Lamberts Lane. I will be going into The Thickett regardless, but will work with the applicant to make things less confrontational than it might otherwise be. Also at my home just north at The [redacted] (next to RG138) the red line boundary cuts across the top of my driveway and blocks access to the country lane and the national highways. This is clearly unacceptable to have control over whether and when I can leave my home by car, accentuated by the fact that we live amongst fields in the middle of the countryside, miles from the nearest village and public transport. Again I will leave my house by car when I need to regardless of The applicant but will work with them if they wish this to be non-confrontational.</p>	<p>The Applicant recognises that there are many legitimate reasons for crossing the works areas and will review adopting similar arrangements to those being developed to manage agricultural interfaces with similar features to The Thickett.</p> <p>The Applicant is committed to working collaboratively with this affected party, and access will be maintained at all times to his home and to the Thickett, as detailed within item TT 1.27 of 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. This states that:</p> <p><i>'Access to residential properties shall be maintained at all times throughout construction and operation. This is secured in Article 16(3) of 3.1 Draft Development Consent Order [APP-056] which states "The undertaker must provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary closure, alteration or diversion under this article if there would otherwise be no reasonable access." It is anticipated that roads would only be temporarily closed where this is required for safe working. In accordance with commitment AS03 in 7.2 Outline Code of Construction Practice [REP2-014], 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 phase, or as agreed through landowner discussions. This may require signed diversions or temporary restrictions to access.</i></p> <p><i>Where this is not achievable, alternative arrangements will be made with the affected parties through the land agreements [...]</i>.</p>
REP4-409	Nicholas Cheeseman	<p>The likely change to visual amenity experienced by receptors at High Hopes and</p>	<p>The purpose of the assessment presented in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Parts 1 to 5 [Revision C] is to determine where there may be breaches in the</p>

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		<p>Gable End have been assessed with specific reference to the introduction of proposed pylons RG21 and RG22 and their associated overhead line infrastructure. These residential receptors, to use the Applicants own terms, are considered to be of high sensitivity due to the private residential nature of the views and the importance of outlook to residential amenity. Existing views from these properties are presently characterised by an open rural landscape containing agricultural fields, mature hedgerows, tree belts, ponds, woods and wide open skies. There are no other industrial elements visible, save that of the distant pylon line running past Flordon Village. At most you can see [redacted] and [redacted]. Existing vegetation along field boundaries and around residential curtilages provides little filtering of views, although open views are obtainable from upper storeys, garden areas and access routes, particularly during winter months when deciduous vegetation is not in leaf.</p> <p>The introduction of pylons RG21 and RG22 would result in the addition of prominent vertical structures within the local landscape context. Due to their scale, height and engineered appearance, the pylons would dominate the view from these properties. There would be no escape from the harsh industrial scale, particularly from the impact of RG22. To coin a phrase; it would be in your face from all primary windows at High Hopes. The view of the pylon would be totally uninterrupted save for a four foot high garden fence; there are no trees or vegetation to mitigate the brutal satanic view. The associated conductors would also introduce horizontal visual elements extending across the skyline and short to middle-distance views, increasing the perception of infrastructure within the landscape. The degree of visual change would vary between properties depending on orientation, intervening vegetation and proximity to the proposed alignment. At High Hopes, where views toward the alignment are open, the pylons will be</p>	<p>Residential Visual Amenity Threshold (RVAT), as a result of the Project, as described in Landscape Institute Technical Guidance Note 2/19¹². The study area and rationale for this is explained in paragraph 13.2.5 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]. Whilst it is recognised that properties outside of this study area may experience significant visual effects, they are not likely to be so great that the RVAT would be breached and have therefore not been included in this assessment. However, visual effects on residential receptors beyond this are assessed more broadly in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226].</p> <p>The Applicant has previously responded to feedback and reviewed a number of alternative alignments in this location. Alternatives to the north would impact more woodland and would also increase the impact on a proposed solar farm development. Alternatives would also be longer and require additional angle pylons and would be therefore less consistent with the Holford Rules. Further detail is provided in 5.1 Consultation Report [APP-066] at 9-3.95, 9-3.148, 10-22.51 and 11-3.24. We do not dispute that the proposed infrastructure will result in effects. These are assessed and reported in the Environmental Statement. There are different effects from the alternatives which are longer and require more angle pylons. The Applicant's position is that the Project alignment is acceptable in the context of NPS EN-1 and EN-5.</p>

¹² Landscape Institute (2019) Residential Visual Amenity Assessment. Technical Guidance Note 2/19

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clearly perceptible and would become defining features within portions of the outlook. The change would be most appreciable from external amenity areas and windows with direct or partially direct views toward the infrastructure corridor. The greatest impact will be on High Hopes where the pylon base will only be at best, about 200m away across an open field. At Gables End vegetation and built form provide a greater degree of filtering and obliquity, reducing the prominence of the structures in comparison with the more exposed receptors. The introduction of RG21 and RG22 would alter the existing composition of views by increasing the presence of large-scale man made infrastructure within an agricultural landscape. The pylons would contrast with the finer grain and organic qualities of the surrounding vegetation and field pattern, particularly during the initial years following construction before any mitigation planting has matured. Temporary construction activity associated with erection of the pylons will also give rise to visual disturbance, including movement of machinery, construction compounds and soil disturbance. It is understood that there will be a working compound within a few meters of High Hopes. The magnitude of visual change for receptors at [REDACTED] and High Hopes is therefore considered likely to be major adverse during the initial operational phase, owing to the prominence and proximity of pylon RG22 within the outlook. Over time, as mitigation planting and existing vegetation mature, effects may reduce slightly but are likely to remain major adverse due to the permanent and substantial nature of the structures. For receptors at Gables End, where views are more filtered and indirect, effects are anticipated to range from minor to moderate adverse. Overall, the introduction of pylons RG21 and RG22 would result in a clear and perceptible alteration to the visual amenity currently experienced by these residential receptors. The proposal would wholly dominate views and render them unattractive and would introduce visually prominent infrastructure elements into a currently rural

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		<p>outlook, resulting in locally significant changes to residential visual amenity for the nearest and most open receptors. Why has the Applicant not included these properties in its assessment in table A13.4.4 Assessment of Likely Changes to Visual Amenity (Step 4). Is it incompetence or a deliberate attempt to mislead? A simple solution would be to move the pylon route by some 500 m North West, away from the properties, yet still on our land. It would minimise the visual impact and reduce the physical and mental harm to the residence of [REDACTED] as well as High Hopes and Gable End.</p>	
REP4-410	Mr R Webster and G Webster & Son Ltd	<i>[Resubmission of REP1-239]</i>	<p>The Applicant has identified that REP4-410 is a resubmission of the Written Representation [REP1-239] submitted by G W Webster & Son Ltd & Rex Webster. The submission is therefore not duplicated in this document and the Applicant refers to its detailed response on pages 125 to 126 of 8.8.1 Applicant's Comments on Written Representations [REP2-029].</p>
REP4-415	Peter Colchester	<p>The day NG decided to post me the details of their proposed pylon route was when my anguish started because I knew if this went ahead it would change everything for my wife and I. That night I could not sleep so I went for a walk of many miles. I had only just a week before got full planning permission on my two barns which were now going to be under the purple swathe of where the N2T pylon route was proposed. A sale of one of the barns fell through because of pylons and I have not been able to sell them since. My wife and I had planned on retiring and to move closer to our grown up children some 2.5 to 3 hours drive away and spend time with our grandchildren. Our retirement plan was based on the sale of the barns, our home and small farm of 130 acres. NG proposed N2T route has been devastating for the value of my barns, home and land. I hoped when I attended the NG public consultations that there would be some understanding of my and many others situation and that they would listen or discuss the possible alternatives such as underground or offshore, but there only response was not possible and too expensive. Too expensive for who? My anxiety was getting much worse as I realised the cost was going to full on my wife</p>	<p>The Applicant acknowledges the seriousness of the concerns raised in this representation, including the effects described in relation to uncertainty, retirement planning, saleability of assets, farm operations and the anticipated presence of pylons on the holding. However, the Applicant's position is that the evidence before the Examination does not demonstrate that overhead line infrastructure gives rise to a generalised or systematic long-term reduction in residential property values across a route corridor.</p> <p>In support of that position, the Environmental Statement refers to the 2024 study prepared by BiGGAR Economics¹³ for Scottish Renewables. That study examined residential property prices and transaction data along the Beaulay-Denny overhead line route and compared trends in locations close to the line with wider local authority and national housing market trends. The Beaulay-Denny line became fully operational in 2015, and the study considered data between 2004 and 2022.</p> <p>The study concluded that housing market trends along the Beaulay-Denny route broadly mirrored those of the wider local authority areas and that macroeconomic factors, including interest rates, cost of living and housing supply, were the principal drivers of house price change. It also reported that a synthetic control regression found no statistically significant impact on aggregate house prices in the affected areas.</p> <p>(See 8.9.1.2 Addendum to ExQ1 SET 1.2, SET 1.3, SET 1.6 [REP4-308]). The report focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers, and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that:</p> <ul style="list-style-type: none"> House prices in affected areas (Highland, Perth and Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaulay-Denny power line.

¹³ BiGGAR Economics (2024) House Prices: Impact of Beaulay-Denny Grid Infrastructure.

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		<p>and I and that the compensation for my losses would be nothing compared to the true financial cost to us, our losses would run into six figures and this would be multiplied all along the pylon route for all individuals and families affected. The thought of this cost being borne not by the Government or NG but by the people just like me because we happen to live in the wrong place. I know other people just like me who are suffering from anxiety to actual depression a feeling of hopelessness that we are to be written off for what we are told is for the national good. My farm sits on top of one of Suffolk's high clay ridges, a pylon built on my land will be seen for miles around and we will have two built on our land. The building of pylons on our farm is going to rip the guts out of our farm. NG have marked out an area which means I will lose a third of my farmable land for 3 to 5 years. At this time I have no idea of what I will be compensated for our losses and damage to our property, this does not include what we have been working for many years to improve and enhance the environment and to diversify our farm by planting hedges, trees, digging out ponds and joining the Governments environmental schemes, so now we have a greater number of Red listed birds on our farm. This environment is now at great risk it will certainly be damaged by the pylons and their development. This again plays into my anxiety a loss of our hardwork and the achievements we have made which was for the better of all not just ourselves, we have many footpaths across our farm and some will be closed for years because of the pylon haul road. My wife and I are left with assets we will have difficulty selling for a reasonable price (land, home,barns) A farming business which I am going to have to try and keep going for maybe another 5 to 10 years – . We will have to watch and live with the devastation and destruction of our farm and the environment leaving us with the wires and pylons. If you google ugly things in the countryside pylons are up there near the top.</p> <p>My anxiety I try to manage which is hard with so much going on and I find stress harder to</p>	<ul style="list-style-type: none"> Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered. <p>The Applicant does not suggest that the study demonstrates that no individual concerns can ever arise. The same study expressly notes that concerns are more likely where a property is in very close proximity to a pylon or substation such that the immediate amenity of that property may be affected, including by visual effects, audible effects or perceived health risk. It also records that buyer responses are inherently subjective and that some purchasers may be deterred while others may not be. The estate agent consultation evidence within that study is also relevant. It records that consultees had limited experience of the power line having any material impact on house prices generally, but that effects on saleability or price may arise in the very limited circumstances where infrastructure is so close to a property that it affects amenity. The study further notes that impacts may be more acute during the planning and construction phases, when uncertainty and perception may weigh more heavily on buyer behaviour, than after the infrastructure is built and embedded in the landscape.</p> <p>The Applicant recognises the depth of feeling set out in the representation. The evidence before the Examination does not demonstrate a generalised long-term reduction in property values arising from overhead line infrastructure. The Applicant's case remains that the likely effects on property values are not significant at an aggregate level, and that individual concerns regarding land take, operational effects, temporary construction disruption and compensation are more appropriately considered through the relevant land, valuation and compensation processes on the facts of each individual case.</p>

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REP4-417	Stephen Podd	<p>deal with than I did before, I am thankful for my wife and family; I have to try and keep it all in a box and concentrate on other things. It does not help when NG can bully me into letting them on my land, as if I do not agree then they can use statutory powers so what choice do I have? They have carried out numerous surveys on my land and I am not allowed to know the results – why? I feel this is another tick box exercise with us not being able to check or scrutinise the results. Also once the pylons are up we will be restricted to how and what we can use our land for – this is not just under the pylons and wires but also either side of them as well – this is yet another area that I will not be compensated for. Please consider the better alternatives to pylons not just for me but for all who are in their way and for the people who come after us, if not let us have fair recompense and a true justice for our losses.</p> <p><i>REP 3/037 Additional Viewpoints, and Document: 8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 Final Issue A April 2026 Planning Inspectorate Reference: EN020027.</i></p> <p>Page 233 NG response to Earl Stonham Parish Council NG response includes: “Three viewpoints are located within the parish, presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. The effect on Viewpoint 2.40 A1120, Forward Green (pdf page 46) is assessed as minor and not significant (adverse).” This viewpoint at Forward Green/A1120 understates the visual impact of the pylons. The viewpoint needs to be further west, near Wicks Lane and Earl Stonham Village Hall, from where the proposed power line and pylons will be much more visible.</p>	<p>The Applicant has responded to the submission by Earl Stonham Parish Council in 8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]. The Applicant has identified that there would be a significant effect on visual receptors within approximately 1.5 km of the Project as set out in paragraphs 13.5.73 to 13.5.84 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. This includes the area around Wicks Lane and Earl Stonham Village Hall, west of Forward Green, which is approximately 1 km from the nearest proposed pylon. The Applicant notes the request for the viewpoint to be moved west towards Wicks Lane and Earl Stonham Village. A change in the viewpoint location would not alter the outcome of the assessment.</p>
REP4-417	Stephen Podd	<p>NEW INFORMATION Re Designated Recreational Route I understand from the Suffolk County Council Green Access Officer that The Mid Suffolk Footpath (a designated recreational route) is having to be re-routed from the location where it would be crossed by the proposed power line. The preferred new</p>	<p>An assessment of effects on users of the Mid Suffolk Footpath is provided in paragraphs 13.12.45 to 13.12.59 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. The location of the Mid Suffolk Footpath is shown on page 4 of 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP4-160]. The Applicant notes that the Project would pass over the current route of the Mid Suffolk Footpath in proximity to RG145. Should the Mid Suffolk Footpath be rerouted along FP66 there would be close views from the new alignment and effects on visual receptors are likely to be significant.</p>

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		<p>route follows Mendlesham FP66 all the way to the junction with the Middy Railway Footpath (another designated Suffolk recreational route) north of Gipping. If that new route is ratified, it would mean the proposed power line would run parallel to it for a kilometre, less than 100m from the footpath. This would have a serious impact on the enjoyment of the footpath, as well as affecting its heritage importance as an historic 'green lane', parish boundary and Hundred boundary (between Stow and Hartismere Hundreds).</p>	<p>Notwithstanding the above, the Applicant notes that, whilst not totally clear from the description, it believes the comments could be referring to impacts on Mendlesham BOAT 59 (W-392/059/0) , BOAT 66 (W-392/066/0), FP41 (W392/041/0), or FP46 (W-392/046/0). The Applicant can therefore confirm that the impacts on these PRow would be temporary only, as detailed in 7.6 Outline Public Rights of Way Management Plan [Revision C], comprising either the provision of a temporary diversion around working areas, or management of the routes along their existing alignment. Where the Mid Suffolk Footpath is impacted along Saxham Street it is anticipated that pedestrian access will be managed to ensure pedestrian use can continue safely through the construction period.</p>
REP4-422	Cotton Parish Council	<p>We urge the Inspectorate to strongly challenge the National Grid (NG) regarding Heritage Assets in the light of many representations, especially that of Virginia Brewer, Heritage Consultant. She asserts that significant harm will be caused by the cumulative effect of tall and linear infrastructure on many heritage assets along the route, which the Grid have either inaccurately assessed or have scoped out of assessment altogether. We agree that the Grid has presented a misleading picture of the overall harm caused along the route. And in Cotton, we believe that the arguments for recognising the historic value and setting of certain properties, such as Hempnalls Hall, have been largely disregarded.</p>	<p>The Applicant has responded to the submission by Virginia Brewer on behalf of Pylons East Anglia in 8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [Revision A]. The Applicant has responded to matters raised regarding Hempnalls Hall, for example on page 192 of 8.8.1 Applicant's Comments on Written Representations [REP2-029]; page 162 of 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] and section 2.12 of 8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089].</p>
REP4-422	Cotton Parish Council	<p>The whole construction phase for the pylons, if there is no movement on further undergrounding, continues to be a major concern. We were pleased to read that after the February hearings that the P.I. would explore alternatives to the stone/aggregate haul roads where possible with the NG.</p> <p>The number and scale of haul roads to construct 15x50m plus pylons in Cotton Parish points to huge amounts of large lorry movements along narrow lanes and roads and across rich agricultural land. Calculations by one of our affected farmers estimate that 44 x 20ton lorry loads of hardcore/stone would be needed to build the haul roads between each pylon (circa 360m apart) and the same again to remove them. That could mean over 1300 lorry loads for the haul roads alone. This takes NO account of the transportation of all the other materials to build each pylon e.g.,</p>	<p>The Applicant responded to a Written Question raised by the Examining Authority regarding this matter (around the HGV movements associated with the import and removal of the haul road) in TT 1.11 within 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. This response sets out haul road design principles, the options considered to reduce the volumes of stone and an overview of how the trip generation has been undertaken.</p> <p>The Applicant responded to the concerns raised by Cotton Parish Council on HGV movements on narrow lanes in 8.8.1 Applicant's Comments on Written Representations [REP2-029].</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
REP4-422	Cotton Parish Council	<p>concrete for bases, steel for lattice and scaffolding, wires etc. Naturally we worry about noise, safety, permanent damage to land and at least temporary damage to roads and lanes and footpaths in our village. But we are deeply concerned about the volume and nature of this activity and traffic along the whole 180km route. It is so damaging to the environment.</p>	<p>The Applicant has previously responded to suggestions for an HVDC alternative and therefore refers to its detailed position in section 3.4 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. In summary, in developing the Project the Applicant has considered realistic alternatives, including onshore AC cable, AC gas insulated line, HVDC options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socioeconomic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity.</p>
REP4-423	West Bergholt Parish Council	<p>In response to your request for information regarding the need for a specific financial compensation package for the impact on West Bergholt and its environs caused by the implementation of the Norwich to Tilbury project now in its examination phase, we submit as follows.</p> <p>West Bergholt Parish Council has already submitted its objections to the scheme for consideration during the Statutory Consultation in 2024. Our objections included a detailed description of the financial compensation that we demand in respect of the landscape and visual impact on West Bergholt and its environs in mitigation of the said impact. Consequently, we can do no better than to reiterate some of the salient points from our original submission.</p> <p>Figure 1 below [see REP4-423] denotes the general pylon zone within the Parish boundary which would be the most severely affected should the project be implemented. Note, that this figure denotes certain aspects of this area which are of particular environmental importance.</p> <p>It is fair to say that erection of the pylons will impinge unfavourably on every single member of the village community of some 3300 persons occupying some 1600 dwellings at</p>	<p>In relation to per-household financial compensation, the government has announced its intention to develop a bill discount scheme for households located within 500 metres of new transmission infrastructure. This remains an area of evolving government policy. Planning and Infrastructure Act 2025 provides the government with the enabling powers to establish a scheme, with further regulations and secondary legislation required before it can be brought into operation.</p> <p>In relation to wider community funds or provision of recreation facilities, the government has also published guidance on community funds for transmission infrastructure. In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance.</p>

Examination Library Reference	Interested Party	Matter	Applicant's Response
		<p>present. This being the case, the Parish Council would be seeking for each dwelling to have electricity bills waived in full for twenty-five years from commencement of construction of the scheme in the area of West Bergholt. Alternatively, the Council would seek for a lump sum of £150,000 to be paid to every household within the Parish boundary (this to take into account inflation over twenty-five years from commencement of construction).</p> <p>In addition to the foregoing, a requirement for the development of a substantial piece of land which has been acquired by West Bergholt Parish Council by way of a Section 106 has arisen. It is estimated that the cost to develop the said area as a sports and recreation facility for the benefit of the entire village would amount to £150,000 and that the Council now wishes to include this further item in its claim for reparation and mitigation for the damages which will be caused to the community as a whole during implementation of the Norwich to Tilbury scheme.</p>	
REP4-333 REP4-385 REP4-391 REP4-394 REP4-396 REP4-397 REP4-398 REP4-402 REP4-404 REP4-418	Offton and Willisham Parish Council Caroline Homewood Fey Jones Gillian Mather Graeme Piercy Harry Lushington Jane Lushington Jeremy Taylor John Cavill The Lazell Family	<i>Comments relating to Accompanied Site Inspection (ASI) and Unaccompanied Site Inspections (USI)</i>	The Applicant has reviewed and acknowledges the submissions which relate to USIs or the ASI itinerary, which are matters for the ExA. The Applicant therefore makes no comment.

**Appendix A
Applicant's
Responses to Tables
1-8 from Suffolk
County Council
Deadline 4
submission [REP4-
335]**

Appendix A Applicant's Responses to Tables 1-8 from Suffolk County Council Deadline 4 submission [REP4-335]

Table A.1 Applicant's Responses to Tables 1-8 from Suffolk County Council Deadline 4 submission [REP4-335]

Table 1: 3.1 (C) Draft DCO [REP3-004]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Response
1.1	Landscape and Visual	Schedule 3 Requirement 4(3) Pre-commencement operations	<p>SCC (Landscape) is concerned that if all pre-commencement operations must be carried out in accordance with the outline code of construction practice, the outline construction traffic management plan, the outline landscape and ecological management plan and the outline public rights of way management plan unless otherwise agreed with the relevant planning authority, this will lead to greater than necessary vegetation loss. This concern results from the use of the Rochdale Envelope, seeking consent for a reasonable worst-case scenario, which is presented in the outline plans.</p> <p>SCC considers that before any vegetation removal is carried out, detailed tree and hedgerow surveys (carried out in the field) should inform the design and micro-siting which should in turn inform updated vegetation retention and removal plans, with a view to avoid all unnecessary loss of vegetation.</p> <p>If vegetation clearance is carried out as part of the pre-commencement works and is based on plans which had the purpose to achieve consent rather than contain the necessary and up-to-date detail for construction, there is the danger that the clearance works would be in breach of paragraph (2) of Article 51.</p>	<p>The Applicant originally set out its position on pre-commencement operations (including the removal of trees and hedgerows) in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>To expand on this position, the Applicant does not agree that the drafting of 7.2 Outline Code of Construction Practice [Revision E] and associated outline management plans would enable premature or unnecessary hedgerow removal at the pre-commencement stage or give rise to a potential breach of Article 51 (2) of 3.1 Draft Development Consent Order [Revision E].</p> <p>The definition in 3.1 Draft Development Consent Order [Revision E] of 'pre-commencement operations' includes 'site clearance' and could in principle encompass the removal of trees and hedgerows, thus engaging Articles 50 and 51, should these Articles be read in isolation. However, the power to carry out site clearance as a pre-commencement activity is expressly constrained by the framework within 3.1 Draft Development Consent Order [Revision E] meaning other control mechanisms such as compliance with Schedule 3 Requirements are not disapplied; and the approval process of discharging Requirement 4 means that trees and hedgerows would not and could not be removed on the basis of consenting-stage information alone.</p> <p>Schedule 3 Requirement 4 requires all pre-commencement operations to be carried out in accordance with the outline management plans unless otherwise agreed with the Local Planning Authority. 7.2 Outline Code of Construction Practice [Revision E] Table 6.1 Mitigation measures / environmental commitments, includes those measures secured through all Requirement 4 management plans, and establishes a clear and enforceable process whereby decisions on vegetation removal are dependent on detailed surveys, design refinement and the approval of subsequent plans.</p> <p>These include (but are not limited to):</p> <ul style="list-style-type: none"> • Requirement for post-consent arboricultural surveys (GG14) where following detailed design and prior to construction, updated surveys of trees and hedgerows must be undertaken to ensure that removal is reduced as far as practicable. • Pre-construction condition surveys (LV01–LV02) where trees and hedgerows must be surveyed and their condition recorded prior to works, forming the baseline for protection and retention. • The preparation of detailed arboricultural documentation (LV09–LV10) which requires an Arboricultural Method Statement (AMS) and Tree Protection Plan to be prepared, identifying trees and hedgerows to be retained, root protection areas, construction exclusion zones, and any necessary removal, with justification. <p>The Applicant confirmed in response to question LV 1.30 of 8.9.1 Applicant's Response to First Written Questions [REP3-074] that from an arboricultural perspective pre-commencement works are considered as 'construction elements' so any</p>

Table 1: 3.1 (C) Draft DCO [REP3-004]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Response
1.2	Health and Wellbeing	Schedule 3 Requirement 7	<p>SCC (Public Health) maintains its longstanding concern regarding the core working hours as set out in [REP3-003]. As currently proposed in Requirement 7, 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 and various exemptions, do not provide affected communities with sufficient or predictable periods of respite from construction related noise, vibration, traffic and general disturbance. Whilst the Applicant's rationale regarding programme flexibility is acknowledged, we do not accept that flexibility for construction programming should outweigh the health and amenity needs of local residents. Predictable quiet periods are a fundamental mitigation measure for protecting community wellbeing, especially where construction effects may interact with other NSIPs in the region. Reliance on management plans and best practicable means cannot fully mitigate the health impacts arising from extended daily working, weekend or Bank Holiday activity, and the routine potential for early starts, late finishes or night-time works through broadly defined exceptions. In this context, the proposed working hours risk normalising prolonged exposure to disturbance rather than minimising it at source.</p> <p>SCC (Public Health) therefore reassert its position that the construction working hours should be amended to provide more protection for public health. Construction activity should be limited to Monday to Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine working on Sundays or Bank Holidays. Any deviation from these hours should be exceptional, clearly justified, time limited, and subject to advance agreement with the relevant local authority and affected communities. Start-up and close-down activities should not involve activities likely to generate noise above agreed levels or disturbance outside those periods.</p>	<p>control measures in outline management plans that reference construction would need to be agreed before works to remove trees or hedgerows commence.</p> <p>This means that in practice, no works at any stage post consent to trees or hedgerow including removal (including trees captured by Article 51(2)) could be carried out without approval of the Local Planning Authority.</p> <p>3.1 Draft Development Consent Order [Revision E] is explicit regarding the principles around avoidance and minimisation of vegetation loss. Commitments B02 and B08 require that construction effects will be '<i>designed out / minimised as far as practicable</i>' and that '<i>all hedgerows, shrubs, trees or dense vegetation will be retained as far as is practicable.</i>'</p> <p>The Applicant has provided a detailed justification for the proposed construction working hours in the response to DCO 1.S10 in 8.9.1 Applicant's Response to First Written Questions [REP3-074].</p> <p>The need for predictable quiet periods, as a fundamental measure for protecting community wellbeing, is understood. The Applicant considers that this will be provided for, through the following approach:</p> <ul style="list-style-type: none"> • Construction working hours set out in 3.1 Draft Development Consent Order [Revision E] define the maximum permissible envelope within which works may take place. Construction works would not occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. This in itself implies that residents are likely to have some respite from construction-related noise, vibration, traffic and general disturbance within the course of a normal working day. • Similarly, the construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. As noted in the response to DCO 1.S10 in 8.9.1 Applicant's Response to First Written Questions [REP3-074], periods of higher and lower intensity working will take place at different locations across the duration of the construction period. Information about construction activities taking place in a particular area or community will be communicated by the Main Works Contractor via active community liaison. In this way, residents will have the opportunity to understand when predictable periods of respite are likely to occur. • Construction work is not anticipated to take place every weekend or bank holiday; rather, the inclusion of these hours provides flexibility to manage the construction programme such that the works can be completed and secured safely. This flexibility is critical to maintaining programme resilience. <p>Restrictions have already been proposed for more noisy activities such as percussive piling and HGV deliveries, in order to provide respite for communities. As set out in Requirement 7(2) and (3) of 3.1 Draft Development Consent Order [Revision E], percussive piling and HGV deliveries are limited to the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the Local Planning Authority. No percussive piling works or HGV deliveries are permitted on Sundays, bank holidays or other public holidays.</p>

Table 1: 3.1 (C) Draft DCO [REP3-004]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Response
1.3	Landscape and Visual	Schedule 3 Requirement 8 Pre-commencement operations	<p>(1) This should include pre-commencement works, and the plans should be updated to reflect detailed design and micro-siting, minimising vegetation loss.</p> <p>(2) This needs to include provisions (i.e. clearly show Tree Protection Fencing) for appropriate protection for trees and hedgerows in accordance with BS 5837:2012 Trees in relation to design, demolition and construction (or its updated version).</p> <p>(3) The default for accordance here should be the approved finalised LEMP and its updated Appendices (such as Vegetation Retention and Removal Plans). If this is not available, prior to vegetation clearance it needs to be ascertained, whether less vegetation clearance is required. There should be no obligation to remove vegetation in accordance with a potentially outdated plan ("oLEMP").</p>	<p>Response to Table item 1.1 above explains why tree and hedgerow removal cannot, based on consenting stage information be realised at pre-commencement stage given the commitments made in relation to compliance with Requirement 4.</p> <p>Requirement 8 of 3.1 Draft Development Consent Order [Revision E] only comes into force at commencement ('<i>Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence...</i>') so would not be relevant to pre-commencement operations. The Applicant considers this should be sufficient to address the concerns of Suffolk County Council in this regard.</p>

The Applicant's latest changes (which were submitted at Deadline 3) are included in Table 2.2 (Schedule of Changes to Version B of the draft DCO [REP2-004]) of the Schedule of Changes to the Draft DCO [REP3-009] ('the Applicant's Schedule').

SCC wishes to comment on the following changes (SCC has no comments in respect of the other changes included in the Applicant's Schedule).

Please note where reference in this table is made to a Sea Link DCO document, the reference which follows is a reference to the Sea Link Examination Library.

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
2.1	Art.11 (street works)	The proposed amendment is in response to feedback from host authorities and the Examining Authority on the duration of deemed consent periods. Further explanation can be found in response to DCO1.A2.	<div style="border: 1px solid black; padding: 5px;"> <p>(3) If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 2825 business days (or such other period agreed by the street authority and the undertaker) beginning with the date on which the application was received, that authority will be deemed to have granted consent.</p> </div> <p><u>SCC's comment</u> SCC has previously explained that it will ensure that any application for consent will be dealt with as quickly as possible. SCC has also stressed that it will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented. While a 25 business day decision-making period is slightly better than the previous deadline of 28 days, in the context of having to discharge multiple DCOs at the same time, such a deadline is unrealistic and potentially detrimental to the effective consideration of applications.</p>	<p>Please refer to pages 23-24 of 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] and 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] in which the Applicant maintains its position that 25 business days is justified.</p> <p>The Applicant notes SCC's suggestion that the decision-making process should be paused if the relevant highway authority considers that additional information is reasonably required to make a decision, but disagrees with this suggestion. The drafting of Article 11 already accounts for the parties to agree a longer period of time, which would enable the relevant highway authority to seek further information if necessary. Therefore, the Applicant does not consider it necessary to add further provision for the deemed consent period to be paused.</p> <p>The Applicant further notes that the Applicant on the Sea Link Project has retained a decision period of 35 days (see rows 1 and 22 of Table 3.8 of the Sea Link 9.7 (H) Applicant's Schedule of Changes to the Draft Development Consent Order [REP7-085] of the Sea Link Examination</p>

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 25 business days is too short <u>and requests that it is replaced with 40 business days</u>. (i.e. the "business day" equivalent of 56 days). SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.</p> <p>SCC requests that 25 business days is also replaced with 40 business days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping).</p> <p>A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements).</p> <p><u>The Sea Link draft DCO</u></p> <p>In the Sea Link draft DCO [REP6-005], the applicant (National Grid Electricity Transmission) has included a 35-day period for each of the provisions mentioned above and SCC has sought the extension of that period to 56 days. At Deadline 6 of the Sea Link DCO examination, the ExA submitted its Schedule of ExA's recommended amendments to the applicant's dDCO [PD-024]. The ExA recommended the replacement of 35 days in each of these provisions with 56 days for the following reasons –</p> <p><i>"The ExA considers that given the volume of NSIPs within the local authority areas and the need to allow for consultation and proper scrutiny, that a 56-day period is reasonable and appropriate".</i></p> <p>SCC agrees with the ExA and, for the same reasons, considers the same deadline (albeit drafted in "business days" – i.e. 40 business days) should be included in the instant Order.</p>	<p>Library). In doing so, it refers back to the submissions it made throughout the Examination period, which closely align with those put forward by the Applicant on this Project in the context of the need for efficient delivery of a project of critical national priority.</p>
2.2	Art. 23 (removal of human remains)	The proposed amendment provides a 'business day' equivalent period to the original 56 day period, in response to DCO 1.A3.	<div data-bbox="1190 1434 2006 1671" style="border: 1px solid black; padding: 5px;"> <p>(5) At any time within 5640 business days after the first publication of a notice under paragraph (3) any person who is a personal representative or relative of any deceased person whose remains are interred in the specified land may give notice in writing to the undertaker of that person's intention to undertake the removal of the remains.</p> </div> <div data-bbox="1190 1719 2006 1919" style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>(9) If— within the period of 5640 business days referred to in paragraph (5) no notice under that paragraph has been given to the undertaker in respect of any remains in the specified land; or</p> </div>	<p>Please refer to the Applicant's response to DCO 2.A3 in 8.9.2 Applicant's Responses to Second Written Questions [Revision A] which sets out its position on Article 23 and provides a further proposed drafting amendment. The argument that the Applicant has made in respect of the Bramford to Twinstead project not having any known burial grounds within the Order Limits, applies equally to the Sea Link project to which SCC refers in this table.</p>

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>such notice is given and no application is made under paragraph (7) within 5640 business days after the giving of the notice but the person who gave the notice fails to remove the remains within a further period of 5640 business days; or</p> <p>within 5640 business days after any order is made by the county court under paragraph (7) any person, other than the undertaker, specified in the order fails to remove the remains; or</p> <p>it is determined that the remains to which any such notice relates cannot be identified,</p> <p>subject to paragraph (10) the undertaker must remove the remains and cause them to be re-interred in such burial ground or cemetery in which burials may legally take place as the undertaker thinks suitable for the purpose; and, so far as possible, remains from individual graves must be re-interred in individual containers which must be identifiable by a record prepared with reference to the original position of burial of the remains that they contain.</p>	
			<p><u>SCC's comment</u></p> <p>As drafted, this article raises significant concern for SCC's Archaeological Service ("SCCAS"), particularly in respect of the way in which archaeological human remains will be treated. As drafted, the article poses a risk to archaeological heritage assets and threatens to delay the project. SCCAS understands there are no records of any historic human remains or burial sites within the Order Limits in Suffolk. However, it is not uncommon for human remains to be encountered during archaeological fieldwork, and a project of this scale should anticipate the potential discovery of such remains during ongoing evaluation and mitigation.</p> <p>SCCAS considers article 23 conflicts with archaeological best practice for dealing with human remains in archaeological contexts as it would lead to probable burial features being exposed for an extended period and therefore be at a risk of damage or harm.</p> <p>SCC therefore recommends that, if the applicant persists with this drafting of article 23, it ought to be omitted from the draft DCO.</p> <p><u>The Sea Link draft DCO</u></p> <p>In the Sea Link draft DCO [REP6-005], the applicant (National Grid Electricity Transmission) included a "removal of human remains" at article 23. At Deadline 6 of the Sea Link DCO examination, the ExA submitted its <i>Schedule of ExA's</i></p>	

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p><i>recommended amendments to the applicant's dDCO [PD-024] and recommended the deletion of the "removal of human remains" article from that draft Order for the following reasons – "There are no known burial grounds within the order limits so the ExA considers this article to be unnecessary. Any archaeological human remains should be dealt with in accordance with the archaeological written scheme of investigation".</i></p> <p>At deadline 7, the Sea Link applicant removed article 23 (removal of human remains) from the draft Order [REP7-003]. SCC considers the same approach should be followed here.</p>	
2.3	Art. 50 (felling or lopping)	Correction of cross-reference to paragraph (5) so that deemed consent provision does not operate where an application does not include the statement required by paragraph (6).	<div data-bbox="1190 646 2012 814" style="border: 1px solid black; padding: 5px;"> <p>(7) If an application for consent under paragraph (4) does not include the statement required under paragraph (6), then the provisions of paragraph (6) will not apply to that application.</p> </div> <p><u>SCC's comment</u></p> <p>SCC has a wider point to make in respect of this article: SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: "...the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority" (paragraph 22.1).</p> <p>Regarding "a plan to specifically identify the hedgerows to be removed", while the applicant has prepared "trees and hedgerows to be removed and/or managed plans" it is not clear those plans apply to all hedgerows or important hedgerows to be removed and SCC would welcome clarification on this point.</p> <p>Regarding consent, only trees "within or overhanging the extent of the public highway" (and not included in the "trees and hedgerows to be removed and/or managed plans") are subject to consent. SCC considers this article should be amended to include a more general consent provision.</p>	<p>The Applicant can confirm that the 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A-H [REP4-029 – 035 and AS-092] show all hedgerows to be removed, affected managed, potentially affected, as well as those that are unaffected by the Project. Hedgerows that are 'important' under The Hedgerows Regulations 1997 are included on these plans and specifically indicated by a dashed line.</p> <p>Measures for minimising impacts on all native hedgerows through detailed design, not just those that qualify as 'important' under The Hedgerow Regulations 1997, have been detailed within 7.2 Outline Code of Construction Practice (CoCP) [Revision E]. The Outline CoCP [Revision E] secured by Schedule 3 Requirement 4 of 3.1 Draft Development Consent Order [Revision E] provides a structured process whereby hedgerow removal is only determined following detailed survey, design refinement and plan approval. These measures ensure that decisions are informed by appropriate technical input and subject to formal approval by the Local Planning Authority. It also commits to maintaining a photographic and written record of removal and reinstatement.</p> <p>The Applicant considers it appropriate to seek consent for works to trees within or overhanging the extent of the public highway and not included in the trees and hedgerows to be removed and/or managed plans, in the same way that it would for other works within the public highway under the other streets and highways provisions in 3.1 Draft Development Consent Order [Revision E]. The Applicant has sought to identify all trees that may be affected, however, it is essential to provide a precautionary mechanism for consent where unforeseen circumstances arise in which works may interfere with the public highway. Given the controls already set out in Article 50, together with those in the Outline CoCP, the Applicant does not agree that it is necessary or proportionate to amend Article</p>

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
2.4	Sch. 3 (para 1(3))	Amendment to specify more clearly the type of information or materials that may be approved under the requirements and by whom.	<p data-bbox="1202 403 1976 781">(3) Where any requirement requires the authorised development to be carried out in accordance or <u>in</u> general accordance with matters including a plan, any document, or plan, drawing, strategy, statement, details <u>or other information</u> approved by the relevant planning authority or the relevant highway authority, those matters such document, plan, drawing, strategy, statement, details or other information are to be taken to include any amendments that may have been subsequently be approved in writing by the relevant discharging planning authority <u>or the relevant highway authority in question</u>.</p> <p data-bbox="1190 852 1406 882"><u>SCC's comment</u></p> <p data-bbox="1190 894 2027 1125">Some drafting suggestions – After “in general accordance” insert “with”; After the second “or other information”, replace “are to be taken to include” with “includes”); After “any amendments” leave out “that have been” At the end: leave out “in question”.</p>	<p data-bbox="2065 264 2852 365">50 to include a more general consent provision. The degree of consent required in Article 50 is well precedented in other DCOs.</p> <p data-bbox="2065 390 2674 453">The Applicant has made the proposed drafting amendments.</p>
2.5	Sch. 3 (para 3(1))	The proposed amendment provides a ‘business day’ equivalent period to the original seven day period, in response to DCO 1.A3.	<p data-bbox="1202 1163 1997 1402">(1) Unless otherwise agreed with the relevant planning authority, written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven five business days prior to the date on which those pre-commencement operations are first carried out.</p> <p data-bbox="1190 1474 1418 1503"><u>SCC's comments</u></p> <p data-bbox="1190 1516 2041 1934">SCC's experience of discharging requirements under the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) Order has shown this time period to be too short (though a period of 7 days is included in the equivalent provision of the Bramford Order). The relevant planning authority should get more than 5 business days' notice for pre-commencement works as this provides little opportunity to verify that the activities are valid and comply with the relevant controls. The presence of multiple NSIPs means the resources of local authorities are becoming increasingly stretched. 5 working days hardly provides for any opportunity for a technical review of the notification in comparison to all the</p>	<p data-bbox="2065 1163 2852 1436">The Applicant has previously responded to this point in its response to DCO 1.S7 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. The notice to be provided is a minimum period and the Applicant may be able to provide a longer notice period in practice. However, the notice does not require a response or approval from the Local Planning Authority, therefore, the Applicant does not consider it necessary to extend the time period.</p> <p data-bbox="2065 1457 2852 1793">The notification provision is not an approval mechanism. It is intended solely to provide advance awareness of works and does not impose any obligation on the Local Planning Authority to undertake a review, confirm compliance, or respond within the notification period. The suggestion that the authority should verify compliance, or provide confirmation that works accord with approved plans, would introduce a new control which is not secured through the DCO and would cut across the established structure of the Order.</p> <p data-bbox="2065 1814 2852 1919">The DCO is expressly permissive in nature. It authorises the undertaker to carry out the development within defined limits and subject to the controls secured through</p>

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>relevant controls. A more proportionate and reasonable approach would require confirmation from the relevant planning authority that the pre-commencement operations accord with the plans, which must be given within a more reasonable time period, such as 28 days (or 20 business days, to better align with the applicant's latest drafting). SCC should also receive the notification as certain pre-commencement activities will fall within its remit such as highways, water environment and archaeology. In the light of this, SCC requests that the five business day period is increased to <u>20 business days</u>. (In previous submissions, including the LIR [REP1-178], SCC sought an increase to 35 days; on reflection, SCC considers 20 business days would be satisfactory).</p> <p><u>The Sea Link draft DCO</u></p> <p>At Deadline 6 of the Sea Link DCO examination, the ExA submitted its <i>Schedule of ExA's recommended amendments to the applicant's dDCO</i>.</p> <p>In the Sea Link draft DCO [REP6-005], the applicant (National Grid Electricity Transmission) has included a 7-day period. At Deadline 6 of the Sea Link DCO examination, the ExA submitted its <i>Schedule of ExA's recommended amendments to the applicant's dDCO [PD-024]</i>. The ExA has recommended the replacement of 7 days in the equivalent provision to 28 days for the following reasons –</p> <p><i>"The ExA agrees with [SCC] [REP6-237] that 28 days is a more proportionate and reasonable time period"</i>.</p> <p>At deadline 7, the Sea Link applicant replaced, in the equivalent provision (paragraph 4(1) "stages of the authorised development)) of the draft Order [REP7-003] "seven days" with "28 days". SCC considers the same approach should be followed here, albeit with "28 days" replaced with "20 business days".</p>	<p>Requirements and other provisions. Where the DCO requires approval, that approval is expressly provided for. Outside those defined control points, there is no requirement for the undertaker to seek consent, agreement, or confirmation of compliance.</p> <p>In respect of compliance-based controls, the obligation rests with the undertaker to ensure that the authorised development is carried out in accordance with the DCO. There is no requirement within the Order for the undertaker to demonstrate compliance to the Local Planning Authority prior to undertaking works. Compliance is instead secured through the statutory framework of the DCO, including enforcement mechanisms where necessary.</p> <p>Introducing a prolonged period following notification during which works could not proceed pending potential review or confirmation by the authority would undermine that distinction and, in effect, convert a notification procedure into an approval process. This would materially alter the balance of the DCO and the intended function of pre-commencement works.</p> <p>The Applicant therefore considers that extending the notification period, or requiring any form of confirmation from the Local Planning Authority, would be inappropriate and unnecessary. The controls governing pre-commencement works are already clearly established within the DCO, and the notification provision does not and is not intended to create any additional layer of oversight or approval.</p> <p>Accordingly, the Applicant maintains that the proposed notification period is proportionate and appropriate, and that no amendment is required.</p>
2.6	Sch. 3 (para 3(4))	The proposed amendment is in response to feedback from host authorities and the Examining Authority regarding decision timescales. Further explanation can be found in response to DCO 1.A2.	<div style="border: 1px solid black; padding: 5px;"> <p>(4) Written notice of the commencement and completion of construction of each stage of the authorised development, and the operational use of each stage of the authorised development, must be given to the relevant planning authority within 2825 business days of the relevant event occurring.</p> </div> <p><u>SCC's comment</u></p> <p>SCC does not understand why it should take a month for this information to be provided and considers it should be provided in 5 days (and 5 business days would be fine).</p>	The Applicant updated the timescale in Schedule 3 paragraph 3(4) to 5 business days in 3.1 Draft Development Consent Order [REP4-037] that was submitted at Deadline 4.

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
2.7	Sch. 3 (para 5)	Amendments proposed following feedback from host authorities as to the need for the involvement of the county planning authority in historic environment matters.	<p>5. Archaeology</p> <p>(1) No stage of the authorised development may commence until either a preservation in situ management plan, or detailed written schemes of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the relevant <u>dischargingplanning</u> authority <u>infollowing</u> consultation with <u>the relevant county planning authority and, if relevant</u>, Historic England.</p> <p>(2) Any detailed archaeological works must be carried out in accordance with the approved detailed written scheme of investigation for that stage.</p> <p>(4) All pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant <u>dischargingplanning</u> authority <u>infollowing</u> consultation with <u>the relevant county planning authority and, if relevant</u>, Historic England.</p> <p><u>SCC's comment</u> SCC is gravely concerned with the drafting of this requirement; however, the Applicant has alternative drafting that SCC has commented on in Table 10 below. SCC would refer readers to that response.</p>	<p>Table 10 of the SCC submission relates to the first Written Questions (ExQ1), therefore the Applicant has responded in detail to this point in Appendix B of 8.4.13 Applicant's Response to Comments on its ExQ1 Responses [Revision A].</p>
2.8	(Schedule 4, discharge of requirements (paragraph 2)).	Replacement of "5 days" with "5 business days" and replacement of "21 days" with "15 business days" to provide a 'business day' equivalent period to the original periods in response to DCO 1.A3.	<p><i>Further information</i></p> <p>2.—(1) Where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application.</p> <p>(2) If the relevant authority considers further information is necessary and the <u>Requirementrequirement</u> does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 <u>business</u> days of receipt of the application, notify the undertaker in writing specifying the further information required.</p> <p>(3) If the <u>Requirementrequirement</u> specifies that consultation with a requirement consultee is required, the</p>	<p>The Applicant does not agree to the changes SCC proposes to the drafting of paragraph 2 of Schedule 4 to the 3.1 Draft Development Consent Order [Revision E]. To the extent that there are specified consultees, it is entirely appropriate that the timescales for seeking further information are extended. This is to account for the time necessarily involved in seeking external expertise.</p> <p>Notwithstanding the above, the Applicant has added a new paragraph 1(1) to Schedule 4 in 3.1 Draft Development Consent Order [Revision E] such that the Applicant will share the application document with the relevant named consultees at the same time as it makes the application to the Local Planning Authority to further streamline the process.</p>

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
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relevant authority must issue the consultation to the requirement consultee within 5 business days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the requirement consultee within 5 business days of receipt of such a request and in any event within ~~24~~15 business days of receipt of the application.

(4) If the relevant authority does not give the notification mentioned in sub-paragraphs (2) or (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.

(5) Where further information is requested under this paragraph in relation to part only of an application, that part is treated as separate from the remainder of the application for the purposes of calculating the time periods referred to in paragraph 1 and in this paragraph.

SCC's comment

SCC would propose the following amendments to paragraph 2 of Schedule 4 –

“2.—(1) Where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application.

(2) If the relevant authority considers further information is necessary ~~and the requirement does not specify that consultation with a requirement consultee is required,~~ the relevant authority must, within 5 20 business days of receipt of the application, notify the undertaker in writing specifying the further information required.

~~(3) If the requirement specifies that consultation with a requirement consultee is required, the relevant authority must issue the consultation to the requirement consultee within 5 business days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the requirement consultee within 5 business days of receipt of such a request and in any event within 15 business days of receipt of the application.~~

(4) ~~(3)~~ If the relevant authority does not give the notification mentioned in sub-paragraphs (2) ~~or (3)~~ it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.

Table 2: 3.1 (B) Schedule of Changes to the Draft DCO [REP3-009]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>(5) (4) Where further information is requested under this paragraph in relation to part only of an application, that part is treated as separate from the remainder of the application for the purposes of calculating the time periods referred to in paragraph 1 and in this paragraph".</p> <p>In sub-paragraph (2), 20 business days has been included, and the time limit applies regardless of whether the requirement demands consultation.</p> <p>The same drafting is included in requirement 2(2) of the East Anglia ONE North Offshore Wind Farm Order 2022 (SI2022/432) and requirement 2(2) of the East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/432).</p> <p>In the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) paragraph 2 includes a time limit of "seven business days".</p> <p>It has been well-rehearsed throughout the examination that discharging under the Bramford time limits has proved challenging; a duplication of Bramford (let alone an abbreviation of it) would be unsatisfactory.</p> <p>SCC considers the time limits included in the East Anglia Orders are reasonable (they would not have been included in two made DCOs if the Secretary of State did not consider this to be the case) and their appropriateness is heightened by the fact that the two Orders are for Suffolk NSIPs. Based on the above, SCC considers the case for including its preferred drafting is more compelling than anything put forward by the applicant to date.</p>	

Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
3.1	Highways	General Comment	SCC (Highways) will respond at Deadline 5.	Noted.
3.2	Health and Wellbeing	General Comment	<p>SCC (Public Health) reasserts its position that monitoring of mental health and wellbeing impacts is an essential component of the Project's construction and cumulative impact management and note that such a provision is currently not committed to in [REP3-025].</p> <p>SCC has previously raised concerns regarding the Applicant's assessment of mental health and wellbeing in [REP1-178]. Monitoring represents a reasonable safeguard and a proportionate mechanism for identifying whether impacts on communities are greater than, or different to, those anticipated.</p>	<p>Whilst, as stated in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], the Applicant accepts that there are likely to be impacts on health and wellbeing during the construction and operation of the Project, and that individuals will be impacted differently depending on factors including their location and outlook, impacts are not considered to be significant and as such under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, there is no requirement for monitoring measures.</p> <p>The Applicant accepts that monitoring impacts on health and wellbeing is possible. Indeed, studies such as the 10-</p>

Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>Whilst SCC recognises and welcomes commitment GG36 within the CoCP, the Council does not consider that liaison and complaints-based mechanisms alone provide a structured or evidence informed means of identifying emerging mental health and wellbeing impacts or differential effects on vulnerable groups. Engagement measures do not remove the need for monitoring, rather monitoring provides a foundation for meaningful engagement, transparency and responsive mitigation.</p>	<p>year research project in relation to High Speed 2¹⁴ (HS2), which will consider the extent to which individuals and communities exposed to the planning, construction and operation of HS2 experience positive or negative mental health and wellbeing impacts, have been referenced in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. For the full detailed response refer to HW 1.9 in 8.4.13 Applicant's Response to Comments on its ExQ1 Responses [Revision A].</p>
3.3	Archaeology	<p>6.1.16 <i>“Construction and operation (and maintenance) phase management measures in relation to Hydrology, Land Drainage and Flood Risk are contained in the following: Mitigation measures / environmental commitments in Table 6.1. Outline Flood Warning and Evacuation Plan (see Appendix G) Surface Water Management Plan – this Plan has not been prepared to support the Outline CoCP because the detailed design is not yet known. This Plan will demonstrate how runoff across the site will be controlled and how any off-site effects will be managed and mitigated and will be prepared by the Main Work(s) Contractor.”</i></p>	<p>Impacts on archaeology and palaeoenvironmental deposits must also be considered within the Hydrological Assessment. De-watering or changes to groundwater regimes can be highly destructive to sensitive deposits, especially those with the potential to preserve organic remains. Such impacts may result in irreversible loss of archaeological and palaeoenvironmental information. Therefore, hydrological modelling and mitigation strategies must be developed in consultation with the Historic England Regional Science Advisor and integrated into the wider environmental management framework.</p>	<p>The Applicant has reviewed and acknowledges the Respondent's comment. Please find a detailed response to this matter within document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 120-121. Dewatering is also addressed in response to ExQ2 HE 2.14 in 8.9.2 Applicant's Responses to Second Written Questions submitted at Deadline 5.</p>
3.4	Archaeology	<p>GG08 <i>“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 area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary.”</i></p>	<p>Management for the protection of archaeological and other heritage assets must be secured through an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will detail the production of a Historic Environment Management Plan (“HEMP”). This document should set out clear methodologies for the preservation and protection of heritage assets throughout all phases of the project (construction, operation, enhancement and decommissioning). The HEMP should be developed in consultation with the Historic England Regional Science Advisor and relevant local authority archaeological advisors or heritage advisor to ensure it reflects best practice and is proportionate to the significance and sensitivity of the affected heritage assets.</p>	<p>The DCO Requirement 5 text has been updated to state that the relevant Detailed Written Schemes of Investigation (DWSIs) will include a Preservation In Situ Plan, if appropriate to the site in question. The Applicant will not provide a post-construction Preservation In Situ Plan as the operation (and maintenance) phase would not result in below ground impacts outside those areas within the Order Limits that have already been subject to intrusive construction activities, and therefore will have been archaeologically evaluated and mitigated as appropriate. See document 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] for a description of operation (and maintenance) activities. The Project will result in a body of archaeological data which will be recorded in the relevant Historic Environment Records. Should a major, unforeseeable incident result in the requirement for major maintenance activities that may result in below ground impact in areas not already archaeologically evaluated and mitigated as appropriate, the relevant HER will hold the</p>

¹⁴ Morley, K., et al (2024) Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing

Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
3.5	Archaeology	<p>H03 <i>"The location of known archaeological remains or areas where archaeological investigations will be undertaken (i.e., excavations) will be signposted/ fenced off to avoid unintentional damage."</i></p>	<p>To avoid unintentional damage to archaeological heritage assets, all relevant management measures must be included in the live constraints mapping for the project. This ensures that heritage assets and sensitive areas are clearly visible and accessible to all teams involved in construction, operation, and decommissioning activities. Early identification and mapping of these constraints is essential to ensure effective avoidance and mitigation.</p>	<p>information required to inform the maintenance work regarding the historic environment. Neither will the Applicant provide a Preservation In Situ Plan for decommissioning of the Project as these works would be at least 45 years into the future, and it is envisaged that any such works would take place under the terms of a concurrent archaeological condition.</p>
3.6	Archaeology	<p>H04 <i>"Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements."</i></p>	<p>While the commitment to notify the Local Planning Authority ("LPA") upon the discovery of previously unknown or unexpectedly significant heritage assets is welcomed, it is essential to emphasise the importance of early-stage archaeological evaluation to minimise such risks.</p> <p>Archaeological evaluation (geophysical survey and trial trenching) is a critical component of the pre-application and pre-consent process. These combined methods help identify areas of archaeological sensitivity, assessing the significance of known and unknown assets, and inform the development of mitigation strategies. Early identification enables the project to integrate mitigation into the project timetable, reducing the likelihood of unexpected discoveries and ensuring compliance with policy and best practice guidance.</p> <p>We would advise the following amendment to H04 add clarity to the commitment:</p> <p><i>For areas of the project where an agreed programme of archaeological investigation has been undertaken, and where land has been released for construction to commence, should previously unknown heritage asset be discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements.</i></p> <p>This amendment clearly sets out a process to be followed, where land is released for construction to commence, and unexpected archaeology is encountered by construction teams.</p>	<p>The Applicant has updated the wording of H04 in response to comments received by SCCAS on 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation. The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] submitted at Deadline 5.</p> <p>H04 now reads: <i>'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, during construction activities, the Project's Archaeological Clerk of Works will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. This will be secured through a DWSI or Preservation In Situ Management Plan, in line with the approved OAMS-OWSI. The Main Works Contractor(s) will be responsible for making sure construction staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions.'</i></p> <p>The Applicant does not propose to update H04 to include the additional wording requested in this comment as the sequential process for archaeological evaluation and mitigation is already secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] and Requirement 5 of 3.1 Draft Development Consent Order [Revision E].</p>

Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
3.7	Archaeology	<p>W06</p> <p><i>“Where a main river is crossed by a trenchless crossing, the cables will be laid at least 1 m below the hard bed level of the river and will remain at or below this level for not less than 3 m from the brink of the riverbank. Marker posts shall also be positioned on each bank of the river to indicate the location of the under-crossing and the nature of the works.</i></p> <p><i>The Project proposed the following trenchless crossings (as detailed in Table 4.9 within ES Chapter 4: Project Description (document reference 6.4)):</i></p> <ul style="list-style-type: none"> • <i>Section C: Higham Road</i> • <i>Section C: River Stour (north part), River Stour (south part)</i> • <i>Section C: A12 highway crossing</i> • <i>Section C: Railway crossing (east of Ardleigh).”</i> 	<p>Where a main river is crossed by a trenchless method (such as horizontal directional drilling or microtunnelling) the design of that crossing must take into account the potential for archaeological and palaeoenvironmental remains and their preservation. River valleys often contain deeply stratified and organic-rich deposits, including peat and alluvium, which may preserve significant archaeological and palaeoenvironmental evidence.</p> <p>For Section C River Stour (north part), River Stour (south part) SCCAS would like to highlight that in 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment [APP-185] paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible.</p> <p>To avoid disturbance or degradation of these sensitive deposits, the crossing design should be informed by appropriate geoarchaeological and palaeoenvironmental assessment and developed in consultation with the Historic England Regional Science Advisor. This will ensure that the methodology is proportionate and aligned with best practice for the protection of sensitive archaeological heritage assets.</p> <p>Please see comment on GH11 on hydrological risk assessment for archaeology.</p>	<p>The Applicant acknowledges the council's comment on the need to tailor trenchless crossings to protect archaeologically and palaeoenvironmentally sensitive deposits, including river valleys, and notes that this has been addressed in our ongoing process. Our response on pages 355 – 356 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out that the approach to safeguarding archaeology is governed by 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] under Requirement 5, with geoarchaeological and palaeoenvironmental investigations incorporated where necessary. The geoarchaeological monitoring of Ground Investigation works for the Stour Valley (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]) reported sequences of natural layers with no archaeological deposits. Further work is provided for within 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] and will be updated in consultation with Local Planning Authority Archaeological Advisers, as already confirmed above. The Project design at the Stour crossing is not yet finalised. Once the detailed design is finalised, the archaeological implication will be dealt with under the terms of the relevant DWSI. The DWSI will include the requirement for geoarchaeological/ palaeoenvironmental assessment to determine the impact on potentially significant superficial deposits, and details of archaeological evaluation/mitigation should such be required. No on-site works would be undertaken until the DWSI is agreed with the LPAAA.</p>
3.8	Archaeology	<p>W21</p> <p><i>“Drainage ponds and outfalls serving temporary works during construction of the Project will be removed following construction, and the land reinstated.”</i></p>	<p>SCCAS would like to highlight that the Drainage Ponds and Outfalls are impacts which will require archaeological trial trenching prior to their construction to inform appropriate archaeological mitigation. Ground disturbance associated with their construction has the potential to significantly impact archaeological heritage assets that are known and currently unknown.</p>	<p>The Applicant has reviewed and acknowledges the Respondent's comment. Please find a detailed response to this matter within document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 126-127.</p>
3.9	Archaeology	<p>GH11</p> <p><i>“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 (including impacts on groundwater flow and levels, and</i></p>	<p>GH11 should be amended to require the hydrological risk assessment to assess the hydrological risk to sensitive archaeological deposits, deposits with palaeoenvironmental potential and archaeological finds identified during the post-consent geoarchaeological and palaeoenvironmental assessment. Hydrological risk assessment to sensitive archaeological deposits, deposits with palaeoenvironmental potential and archaeological finds must also be included in</p>	<p>GH11 has been updated in the latest iteration of 7.2 Outline Code of Construction Practice [Revision E] (page 52).</p> <p>GH11 now reads: <i>‘At trenchless crossings, and where otherwise indicated in the ES, within Appendix 9.3: Groundwater Baseline and</i></p>

Table 3: 7.2 (C) Outline Code of Construction Practice [REP3-025]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<i>the risk of breakout of drilling fluids and turbidity, where appropriate) at those locations and identify any additional mitigation or remediation that may be required. The nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders, as appropriate."</i>	an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].	<i>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 (including impacts on groundwater flow and levels, and the risk of breakout of drilling fluids and turbidity, where appropriate) at those locations and identify any additional mitigation or remediation that may be required. Separately the potential consequences for sensitive archaeological deposits will be assessed. The nature and scope of any mitigation or remediation will be agreed with the Environment Agency and/or other appropriate stakeholders, including Historic England.'</i>
3.10	Landscape Visual	General comment	<p>SCC has provided detailed comments on the Outline CoCP in the LIR [REP1-178].</p> <p>The comments provided in Section 13 of the LIR still stand. SCC broadly welcomes the additional commitment regarding an Ecology Working Group and the additional Ecology and Biodiversity commitments as far as they refer to Suffolk, although SCC considers that they are too weak/contain too many caveats ('where practicable').</p>	The wording around the remit of the Ecology Working Group has been strengthened in the latest iteration of the 7.4 Outline Landscape and Ecological Management Plan (Revision E) submitted at Deadline 5, following comments from stakeholders.

Table 4: 7.3 (B) Outline Construction Traffic Management Plan [REP3-028]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
4.1	Highways	General comment	SCC (Highways) will respond at Deadline 5.	Noted.
4.2	Landscape and Visual	General comment	<p>SCC (Landscape) considers that a commitment should be included into the oCTMP, to avoid loss of vegetation, as far as possible, in particular for temporary accesses and work compounds and that, where mature trees conflict with a temporary visibility splay, the first default approach is to apply all reasonable forms of traffic management, including temporary traffic lights and low speed limits, to enable the retention of the tree(s).</p> <p>In connection with this, SCC considers that the proposed widening of Bullen Lane and associated works area to the north of Bullen Lane should be descoped or significantly reduced/ altered to avoid loss of the visually important tree group north of Bullen Lane.</p> <p>SCC (Landscape) is concerned with regards to other potential locations, where vegetation is proposed to be cleared for temporary works, even where this could be avoided through small amendments in the works design and communication/consultation with the Local authorities.</p>	<p>The applicant has reviewed and acknowledges the Respondent's comment. The Applicant has updated the wording within paragraph 5.8.14 to capture a commitment on avoiding the loss of vegetation as far as possible in 7.3 Outline Construction Traffic Management Plan [Revision D], submitted at Deadline 5.</p> <p>The Applicant further notes that the approach to mitigation on the highway network is set out in Section 5.9 of 7.3 Outline Construction Traffic Management Plan [Revision D], and that the location described by the Respondent is further shown as C23 within Sheet 5 of 7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section C [Revision B]. This proposed mitigation is required in order to facilitate the anticipated construction and operational movements related to the Project. In line with the approach set out in Section A.3 of 7.11 Transport Assessment – Appendix A – Norwich to Tilbury RSA Strategy [APP-334], the Applicant has undertaken outline</p>

Table 4: 7.3 (B) Outline Construction Traffic Management Plan [REP3-028]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
				design of the proposed highway mitigation at the Bullen Lane junction and undertaken a Stage 1 Road Safety Audit for this location overseen by Suffolk County Council as the Local Highway Authority. The Applicant recognises that the driver behind the loss of trees in this location is the overall size of the proposed construction compound for the highways works. There is an opportunity for the contractor to reconsider the size of the compound required and thus remove the impact on the trees. This would be undertaken as part of the detailed design.

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
5.1	Archaeology	General comment	All ecological works that disturb the ground have the potential to damage or disturb archaeological deposits. Therefore, archaeological assessment and mitigation may be required. This must be managed through an approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and Detail Written Schemes of Investigation where archaeological works are required.	The Applicant has reviewed and acknowledges the Respondent's comment. The impacts of ecological mitigation on archaeology are addressed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] . Any mitigation of these effects will be delivered in accordance with the governance framework set out in 7.2 Outline Code of Construction Practice [Revision E] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] .
5.2	Archaeology	1.2.2 <i>"In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG)."</i>	There needs to be a paragraph in the 1.2 Project Overview section stating that: <i>"The historic environment must be a material consideration when selecting land for environmental mitigation, ecological offsetting, and Biodiversity Net Gain (BNG), including land located outside the project Order Limits. Archaeological assessment and evaluation should inform site selection and the design of mitigation measures so that heritage assets are identified, understood, and appropriately protected or recorded before any enhancement or habitat creation is implemented."</i> Mechanisms for habitat creation often have significance adverse impacts on archaeological heritage assets. Any impacts will need archaeological mitigation. This is why we are advising the addition of the above paragraph. All archaeological works would be undertaken in accordance with the approved OAMS-OWSI and DWSI's where archaeological work is required, which will be submitted and approved by the relevant LPAAA.	If one or more BNG areas are agreed that are located within the Order Limits in locations that have not been archaeologically evaluated, the locations would be assessed and archaeologically evaluated (geophysical survey and trial trenching) depending on former use of the chosen locations and the nature of the proposed BNG. The Applicant is not proposing to acquire land to deliver or manage offsite BNG for the Project. Rather, any offsite BNG requirements would be met through the purchase of biodiversity units from third-party habitat bank providers registered through the applicable process. Responsibility for the delivery, management and monitoring of those habitats would rest with the habitat bank provider and be subject to oversight by the relevant responsible bodies. Accordingly, the Applicant would have no direct control over the implementation of habitat creation or enhancement works on those sites, including any potential archaeological requirements.

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
5.3	Archaeology	1.4 <i>"Environmental Gain"</i>	<p>Offsite Biodiversity Net Gain ("BNG") must be delivered in a way that recognises and protects buried archaeological heritage assets. Site selection, design and delivery of habitat creation or enhancement must be informed by archaeological assessment so that damaging interventions (for example tree planting, pond creation, or soil inversion/de-nitrification used for heathland and species-rich grassland) are avoided, minimised or mitigated before works commence.</p> <p>Please see comments on 1.2.2 for further details on how this can be addressed in the OLEMP.</p>	Please see response to 1.2.2 above.
5.4	Archaeology	2.2 <i>"Construction and Landscaping Schedule"</i>	<p>Where advance works are proposed, archaeology must be consulted as many habitat creation or enhancement methods are excessively damaging to buried archaeological remains (tree planting, pond creation and soil de-nitrification for heathland and species rich grassland creation, etc). It is therefore essential that archaeology is taken into account when choosing locations.</p> <p>This section must state that all advanced works which disturb the ground have the potential to damage or destroy archaeological heritage assets, and therefore, archaeological assessment and mitigation may be required. This must be managed through an approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and Detail Written Schemes of Investigation where archaeological works are required.</p>	The Applicant has reviewed and acknowledges the Respondent's comment. Please find a detailed response to this matter within 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 129, and in response to 1.2.2 above.
5.5	Archaeology	3.3 <i>"Information Training Awareness"</i>	<p>For clarity in project delivery and risk reduction it is important to implement a live project constraints mapping so all environmental, archaeological, ecological, and operational constraints are recorded, visualised, and kept up to date in a single, accessible system for project staff.</p> <p>SCCAS would strongly advise the implementation of live project constraints mapping.</p>	<p>The Applicant provided a response to this in 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] on page 124.</p> <p>The Applicant currently envisages that a digital Environmental Management Plan would be produced by the Project's delivery partner, alongside the use of a Geographic Information System as a compliance tool. This would support the Clerk of Works, for example by clearly identifying constraints and no-go areas such as nesting bird locations, relevant buffers and offsets, and ecological and archaeological mitigation areas.</p>
5.6	Archaeology	5.3 <i>"Designated Sites Mitigation"</i>	<p>Archaeology must be consulted as many habitat creation or enhancement methods are excessively damaging to buried archaeological remains (tree planting, pond creation and soil de-nitrification for heathland and species rich grassland creation, etc).</p> <p>It is therefore essential that archaeology is taken into account when designing habitat replacement and protection measures.</p>	Within the Order Limits replacement planting is to be provided in areas that are impacted by the construction works, with a like for like replacement, i.e., hedgerows are to be planted where they are removed and trees and shrubs will be planted where woodland is removed. New ground will not be broken to create these replacement habitats. New habitats would only be created in the Environmental Areas where these areas will also be

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
5.7	Archaeology	<p>5.3.2 <i>"Where embedded/ standard mitigation measures set out in the Outline CoCP (document reference 7.2) (Revision C), associated with a statutory designated site, are required these have been included within Table 5.3 for clarity. This predominantly relates to pollution prevention measures, which within the Outline CoCP (document reference 7.2) (Revision C) under GG32 states 'Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. There will be no intentional discharge of site runoff to ditches, watercourses, drains, including highways drainage systems, or sewers without appropriate treatment and agreement of the appropriate authority. All practicable steps would be put in place to prevent pollution of watercourses in the case of an emergency, with protocols in place to address accidental spills and severe weather events'."</i></p>	<p><i>GG32 states 'Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. There will be no intentional discharge of site runoff to ditches, watercourses, drains, including highways drainage systems, or sewers without appropriate treatment and agreement of the appropriate authority. All practicable steps would be put in place to prevent pollution of watercourses in the case of an emergency, with protocols in place to address accidental spills and severe weather events'.</i></p> <p>SCCAS recognise the importance of this, but archaeology needs to be a consideration when designing these mitigation measures. Where these mitigation measures disturb the ground they have the potential to damage or disturb archaeological deposits. Therefore, archaeological assessment and mitigation may be required. This must be managed through an approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and Detail Written Schemes of Investigation where archaeological works are required.</p>	<p>affected by construction activities and so new ground will not be broken in these areas. The effects of the landscape planting proposals have been assessed as part of the Project design in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Please find further responses to this matter within document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 128-130.</p> <p>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] applies to all pre-commencement and construction works that have the potential to physically impact archaeological remains,</p>
5.8	Archaeology	<p>Table 5.4 <i>"Non-statutory ecological designated sites relevant to the Outline LEMP"</i></p>	<p>SCCAS notes that clay breakouts from proposed HDD river crossings of the Stour could cause significant environmental harm, and any mitigation for drilling clay breakouts must explicitly consider archaeological impacts. Hydrological changes associated with the works may adversely affect archaeological heritage assets both within and beyond the Order Limits redline. SCCAS notes that 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment [APP-185] paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible.</p> <p>Reinstatement of arable habitat has the potential to cause substantial damage to buried archaeological remains, such areas must therefore be subject to archaeological evaluation and, where necessary, mitigation. Areas identified and agreed for in-situ archaeological preservation must be</p>	<p>The Applicant has reviewed and acknowledges the Respondent's comment. Please find a detailed response to this matter within 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 130-131.</p> <p>Please also see response to Table Item 3.7 above.</p>

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>managed under the AMS-OWSI and by separate DWSIs or a Preservation in situ management plan.</p> <p>Close, ongoing coordination between all Clerks of Works identified in the OLEMP and the Archaeological Clerk of Works is essential to ensure the ecological and archaeological requirements are delivered smoothly and without conflict.</p>	
5.9	Archaeology	6 <i>“Ecology Species Specific Mitigation”</i>	<p>There needs to be a paragraph at the beginning of this section to state that the LEMP will be implemented in close coordination with an approved OAMS-OWSI to ensure that species mitigation and habitat works are planned and delivered alongside archaeological mitigation works.</p> <p>This is essential as it is a two-way impact, where archaeological works can impact ecology and ecological works can impact archaeology and it is essential they work together for smooth delivery of the project.</p>	<p>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] already includes provision for evaluation and mitigation of ecological mitigation of all types, where this has potential to impact archaeological remains. The coordination between the various environmental clerks of works set out in 7.2 Outline Code of Construction Practice [Revision E] and 7.4 Outline Landscape and Ecological Management Plan [Revision E] would ensure that archaeological implications of ecological mitigation will be appropriately accounted for.</p>
5.10	Archaeology	6.1.35 <i>“Where water vole presence is confirmed within a works area, and habitat removal is less than or equal to a 50 m linear length of bankside vegetation (unless otherwise agreed with Natural England), displacement techniques will be used to degrade the bankside habitat suitability either through the use of a CL31 water vole displacement class licence or a standard (A11) mitigation licence obtained from Natural England. Displacement activities will be undertaken either during February to April or September to October and then maintained until construction works have been completed. Mitigation will follow measures set out within the draft water vole licence and agreed with Natural England.”</i>	Archaeology needs to be a consideration for displacement of Water Voles.	<p>Displacement of water voles initially requires vegetation manipulation comprising phased cutting. No ground breaking works are required to displace water voles. Ground breaking works would only be required to remove burrows if in-channel works are required, for example, for an outfall pipe, culvert installation or open cut trenching.</p> <p>Please find further response to this matter within 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 132-133.</p>
5.11	Landscape and Visual	7.3 <i>“Tree Protection Measures 7.4 General Principles of Tree Work”</i>	<p>SCC broadly agrees with the tree protection measures proposed in Section 7.3 of 7.4 Outline Landscape and Ecological Management Plan [REP3-030]. SCC considers that the Tree Protection Plans in accordance with BS 5837:2012 Trees in relation to design, demolition and construction (or its revision), need to be shared and agreed with the relevant discharging local authority.</p>	<p>7.2 Outline Code of Construction Practice [REP4-164] submitted at Deadline 4 included commitment LV05, which refers to the requirement for an Arboricultural Method Statement including a Tree Protection Plan) prior to construction.</p> <p>The Applicant confirms that the relationship between the proposed development and existing trees has been assessed in accordance with BS 5837:2012¹⁵.</p>

¹⁵ British Standards Institution (2012) BS 5837:2012 – Trees in Relation to Design, Demolition and Construction. Recommendations

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
5.12	Landscape and Visual	7.4 <i>"General Principles of Tree Work"</i>	With regards to minimisation of tree losses, SCC considers that a commitment should be included into the oCoCP and other relevant documents, such as the oLEMP and oCTMP, that, where mature trees conflict with a temporary visibility splay, the first default approach is to apply all reasonable forms of traffic management, including temporary traffic lights and low speed limits, to enable the retention of the tree(s).	The Applicant will consider Suffolk County Council's request. 7.2 Outline Code of Construction Practice [Revision E] includes commitment LV04 to ensure trees are retained where practicable.
5.13	Landscape and Visual	7.6 <i>"Hedgerows"</i>	SCC has provided detailed comments and guidance on hedgerows in its LIR [REP1-178], which do not appear to be reflected in Section 7.6 of 7.4 Outline Landscape and Ecological Management Plan [REP3-030].	The Applicant has carefully considered comments made within Suffolk County Council's Local Impact Report [REP1-178] around hedgerows and has made amendments to 7.4 Outline Landscape and Ecological Management Plan [Revision E] where the Applicant agrees. The Applicant has been engaging with Suffolk County Council on the further matters currently still under discussion, as outlined within 5.9.2 Draft Statement of Common Ground - Suffolk County Council [Revision D] .
5.14	Archaeology	7.5.15 & 7.5.16 <i>"Veteran Trees Potentially Removed Four veteran trees require removal, while 15 veteran trees and two veteran groups require crown management to facilitate construction of the Project. When removing veteran trees, there are a number of options available i.e. simulated windfall, stem monolith, phased felling, straight felling. All of the above options seek to retain the woody material in situ. All brash, timber and material from the tree should be retained on site in brash / wood piles as close to the original location of the tree as possible. This material provides a niche habitat for specialist fungi, invertebrates and mammals."</i>	The project need to understand the archaeological implications of veteran tree removal. As the survival of veteran trees tend to relate to survival of historic parkland or historic boundaries and root removal can damage or destroy archaeological deposits.	The removal of veteran trees will not extend to the complete removal of stumps and roots, unless explicitly required to support works in the vicinity. Historic environment – there are no archaeological implications unless the root system is uprooted or otherwise removed. The locations of the veteran trees to be removed have been reviewed and none of them relate to a known parcel of historic parkland. The trees do not coincide with any historic boundaries identified through the historic map assessment carried out by the Project.
5.15	Archaeology	7.7 <i>"Protection of Watercourses 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). Pylons will not be constructed within 8 m of the top of bank of main rivers, in accordance with requirements for regulated activities set out in the</i>	These are likely to have archaeological impacts, particularly on well preserved waterlogged archaeological remains and paleoenvironmental information. Geoarchaeological and palaeoenvironmental assessment will be required to inform specific archaeological methodology will need to be developed to mitigate these impacts. I.e. development of a Peat Management Strategy and Deep waterlogged archaeological excavation strategy.	Pylon bases in proximity of watercourses will have their potential to impact sensitive geoarchaeological/palaeoenvironmental deposits assessed in the relevant Detailed Written Scheme of Investigation (DWSI). Where the potential to impact sensitive geoarchaeological/ palaeoenvironmental deposits is identified, the deposits will be evaluated and mitigated where necessary. The scope of any required archaeological fieldwork would be set out in the DWSI and agreed with the LPAAA.

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<i>guidance for environmental permits for flood risk activities (Environment Agency and the Department for Environment, Food and Rural Affairs (Defra), 2019). It is anticipated that pylons would also not be located within 3.5 m of an ordinary watercourse."</i>		
5.16	Archaeology	7.7.6 <i>"The only main river located within the underground cable sections of the Project is the River Stour. Where the cable route crosses the River Stour at two points, these will be subject to use of trenchless techniques rather than use of an open cut method. This will protect the banks and channel of the River Stour removing any direct construction impacts."</i>	SCCAS would like to highlight that in 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment [APP-185] paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible, this is contradictory to the statement in 7.7.6 of the OLEMP.	Paragraph 7.7.6 in 7.4 Outline Landscape and Ecological Management Plan [Revision E] is correct; the Project is committed to using trenchless techniques to cross the River Stour (not limited to the use of HDD).
5.17	Archaeology	8.1.7 <i>"Woodland, tree and hedgerow removal works would be coordinated with archaeological mitigation as set out in the Outline AMS-OWSI (document reference 7.5) and relevant Detailed WSIs for areas of archaeological sensitivity."</i>	SCCAS welcome the inclusion of this paragraph.	Noted.
5.18	Archaeology	9.1 <i>"Landscape and Ecological Reinstatement and Other Mitigation General Approach [...] 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. [...]"</i>	All landscape and ecological reinstatement and other mitigation works that disturb the ground have the potential to damage or disturb archaeological deposits. Therefore, archaeological assessment and mitigation may be required. This must be managed through an approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and Detail Written Schemes of Investigation where archaeological works are required. The relevant LPAAA should be consulted at the earliest opportunity to review the indicative landscape design in order to provide advice on the archaeological implications of the habitat creation in these locations.	Within the current iteration of the Project design, all areas identified as 'Environmental Areas' and 'BNG Mitigation' have been archaeologically evaluated through geophysical survey and trial trenching. Should the results of the evaluation work identify archaeological remains that require mitigation, this would be carried out before any landscape mitigation and/or ecological reinstatement works. The archaeological works would be carried out and detailed under the terms of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] and a Detailed Written Scheme of Investigation agreed with the LPAAA.
5.19	Archaeology	SCCAS Recommendation	The Historic Environment is considered as part of the Environment within in the OLEMP. Early assessment: Undertake full geoarchaeological and palaeoenvironmental assessment of the river valleys to inform appropriate archaeological mitigation. Mitigation planning: undertake full archaeological evaluation to ensure CoCP, AMS-OWSI and LEMP work together so	Early Assessment The geoarchaeological and palaeoenvironmental assessment of the river valleys will take place at the detailed design stage once the trenchless crossing technique to be used in each location is known. Mitigation planning

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
			<p>that drilling, spoil management, and reinstatement methods are designed to avoid or minimise disturbance to archaeological deposits; where avoidance is not possible, undertaken appropriate mitigation, informed by the results of archaeological evaluation.</p> <p>Hydrological risk assessment: Assess potential hydrological changes from HDD and associated works and evaluate their likely impacts on archaeological heritage assets and important deposits; incorporate findings into both ecological and archaeological mitigation strategies. Consultation with the Historic England regional science advisor for the eastern region is strongly advised.</p> <p>Management of preserved areas: Record any areas to be preserved in situ and manage them through the AMS-OWSI, DWSIs, HEMP and live constraints mapping, with clear responsibilities, monitoring regimes, and long-term maintenance arrangements.</p> <p>Clerks of Works coordination: Establish communication protocols and regular joint site meetings between the Archaeological Clerk of Works and all ecological/engineering Clerks of Works named in the OLEMP to coordinate works, inspections, and unexpected discoveries.</p> <p>Contingency procedures: Put in place a written unexpected archaeological finds procedure linked to the OLEMP so that discovery, recording, temporary protection, and decision-making are consistent throughout the CoCP, AMS-OWSI and LEMP.</p>	<p>Once the detailed design stage is reached and the trenchless crossing technique to be used in each of the locations is identified, any subsequently archaeological evaluation work (and mitigation thereafter as required) will be designed under the terms of the AMS-OWSI and the relevant Detailed Written Scheme of Investigation. The Applicant's Archaeological Clerk of Works will ensure the fieldwork is coordinated with the CoCP and LEMP.</p> <p>Hydrological risk assessment Once the detailed design stage is reached and the trenchless crossing technique to be used in each of the locations is identified, the potential for impacts on archaeological heritage assets and important deposits will be assessed. The findings of the assessments will be incorporated into the archaeological mitigation strategies, which will be set out in the relevant Detailed Written Schemes of Investigation in agreement with the relevant LPAAAs and Historic England regional science advisor for the eastern region. The findings of the assessments will also inform the ecological mitigation strategy, where appropriate.</p> <p>Management of preserved areas These areas will be addressed in the Preservation In Situ Plan, which will be incorporated into the relevant Detailed Written Schemes of Investigation. Any areas identified requiring preservation in situ will be recorded on a web-based GIS Smart Atlas which will include but not be limited to: areas where sensitive archaeological remains are to be preserved in situ (these areas will also be physically fenced off); areas of ecological sensitivity (e.g. badger setts, bat roosts, barn owl roosts, otter holts etc.), and utility plans.</p> <p>Clerk of Works coordination Section 3 of 7.4 Outline Landscape and Ecological Management Plan [Revision E] sets out the various environment management systems and roles for the Project. The role for coordinating between the various Clerks of Works sits with the Environmental Manager(s) as the main point of contact for all environmental matters. This is also set out in Section 3 of 7.2 Outline Code of Construction Practice [Revision E], which states that the CoCP(s) produced by the Main Works Contractor(s) will include lines of communication and reporting.</p>

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
				<p>Contingency procedures</p> <p>A procedure for the aftermath of the discovery of unexpected archaeological remains is set out in section 5.1 of the updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B], submitted at Deadline 5 and in commitment H04 in 7.2 Outline Code of Construction Practice [Revision E].</p>
5.20	Landscape and Visual	9.7 <i>"Landscape Mitigation and Compensation"</i>	<p>SCC considers that the outline landscape proposals for mitigative planting at Environmental Areas and CSE compounds should be further developed during the examination, in light of the updated Ancient Woodland Areas and comments by Interested Parties, such as the local authorities to secure acceptable planting schemes. SCC is particularly concerned with regards to planting along the western boundary of Wenham CSEC (see Viewpoint 3.25: PRow near Woodlands Hall (Raydon 5)) and the access road to the Wenham CSE compound which could adversely affect the Wenham Grove (newly identified Ancient Woodland).</p>	<p>Ancient Woodland is present within Environmental Areas associated with the Wenham Grove CSE compound. Outline landscape proposals are presented in 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision B]. These proposals show the retention and enhancement of existing vegetation, including Wenham Grove Ancient Woodland, together with the provision of new native woodland planting with a scrubby woodland edge adjacent to, but outside, ancient woodland boundaries.</p> <p>Wenham Grove was identified through habitat surveys as being in Moderate ecological condition, albeit with evidence of localised nutrient enrichment, simplified understorey composition, and indicators of historic management. The outline landscape proposals include woodland enhancement measures such as supplementary planting, thinning and natural regeneration which, subject to detailed design, have the potential to have long-term ecological benefits through improvements to woodland structure, condition and connectivity.</p> <p>The Applicant acknowledges the irreplaceable nature and high sensitivity of ancient woodland. Accordingly, it is confirmed that the outline landscape proposals have been developed in accordance with the mitigation hierarchy, with primary emphasis on avoidance of long-term negative impacts. No adverse effects on ancient woodland are anticipated as a result of the proposed landscape measures. All proposed planting is located outside ancient woodland boundaries and their root protection area unless, exceptionally, intervention can be robustly justified as delivering a clear net ecological benefit.</p> <p>In any such circumstances, interventions would be undertaken with strict adherence to measures to protect woodland soils and root protection areas. Low-impact techniques, including hand digging and the avoidance of sensitive root zones, would be employed to minimise disturbance and ensure no long-term adverse effects on ancient woodland.</p>

Table 5: 7.4 (D) Outline Landscape and Ecological Management Plan [REP3-030]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
				Landscape proposals will be subject to further development at the detailed design stage and submitted as part of the Final Landscape and Ecological Management Plan as secured by Requirement 4 of 3.1 Draft Development Consent Order [Revision E] . This process will be informed by the site-specific conditions of Wenham Grove, as well as consultation with the relevant Local Planning Authorities and stakeholders, to ensure that the final planting schemes are appropriate and justified.
5.21	Landscape and Visual	10 "Aftercare"	<p>SCC has provided detailed comments on Aftercare in its LIR [REP1-178], which still stand.</p> <p>SCC does further not agree with the additional wording in 10.1.1 and is of the view that any planting that is to be counted as part of the BNG should be maintained for 30 years, rather than 5.</p>	<p>The Applicant provided a response to the aftercare comments in Suffolk County Council's Local Impact Report in paragraphs 3.13.11 to 3.13.16 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>All planting within the Environmental Areas will be subject of a 30-year aftercare period. The Applicant's approach to replacement planting (outside the Environmental Areas) which is subject of five-years aftercare and justification for its inclusion within the BNG metric has been set out in paragraphs 3.5.2 to 3.5.7 of 7.1 Biodiversity Net Gain Report [APP-299]. In April 2026 the '<i>Summary of responses and government response</i>'⁵ was published following the consultation on the implementation of BNG for NSIPs consultation. The Government's response confirmed that '<i>reinstatement of existing habitats (replacing a temporary loss of habitat with the same habitat type and conditions) is considered non-significant and does not need to be secured. This approach is intended to create more certainty on what is considered significant and resolves the issue set out above on land being returned to its previous owner and use</i>'. The Applicant's approach is therefore supported by the approach that will be taken to BNG for NSIPs when it becomes mandatory in November 2026.</p>

Table 6: 7.4 (B) Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
6.1	Landscape and Visual	General	SCC welcomes that the Ancient Woodland and Veteran Tree Strategy now comprises the data of the Updated Ancient Woodland Inventory. This shows, however that the current alignment potentially affects additional ancient woodlands, previously not recognised.	Noted.

Table 6: 7.4 (B) Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
6.2	Landscape and Visual	Table 3.2	<p><i>Lodgefield Row</i> SCC considers that at this location LoD should be considered/utilised to minimise the impacts on the woodland.</p> <p><i>Wenham Grove</i> SCC considers that works area and access road should be moved outside the 15m buffer zone and as far as necessary to avoid harm to the ancient woodland.</p>	<p><u>Lodgefield Row Ancient Woodland</u> The Applicant has carefully located the overhead line to minimise impacts on ancient woodland, including Lodgefield Row. However, any eastward deviation would increase the risk of encroachment into Great Newton Wood, a larger area of ancient woodland and County Wildlife Site. Commitment B32 in 7.2 Outline Code of Construction Practice [Revision E] secures that impacts from the 400 kV overhead line on Lodgefield Row are to be avoided or minimised through detailed design, including coppicing only where essential to maintain statutory clearance.</p> <p>The proposed works at Lodgefield Row are limited in extent (a small corner) and minimal in nature, comprising upper canopy management only to maintain statutory electrical clearances beneath the 400 kV overhead line. The affected trees do not display ancient or veteran characteristics, and the irreplaceable qualities of the woodland, including its soils and seed bank, would not be affected.</p> <p>Where works are required within the root protection area, these would be undertaken using sensitive, low-impact methods, as set out in 7.4 Outline Landscape and Ecological Management Plan – Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032] and secured through Commitment B31 in 7.2 Outline Code of Construction Practice [Revision E]. Commitment B31 also secures that construction of the temporary haul road will be micro-sited to avoid the 15 m root protection area at Lodgefield Row where practicable. Accordingly, impacts on Lodgefield Row would be negligible, with no significant long-term residual effects.</p> <p>The proposed mitigation strategy set out in 7.4 Outline Landscape and Ecological Management Plan – Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032] has been the subject of ongoing consultation with Natural England, and no specific concerns have been raised regarding the proposed mitigation strategy for Lodgefield Row ancient woodland.</p> <p><u>Wenham Grove Ancient Woodland</u> In response to Suffolk County Council's comments on Wenham Grove ancient woodland, Commitment B34 in 7.2 Outline Code of Construction Practice [Revision E] secures micro-siting of the access road and associated working areas to avoid the 15 m root protection area. At detailed design, Wenham Grove ancient woodland will be treated as a key constraint and the alignment refined accordingly.</p>

Table 7: 8.10.1 (A) Ancient Woodland Technical Note – Part 1 [REP3-058] and Part 2 [REP3-059]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
7.1	Landscape and Visual	Appendix B [REP3-059]	<p>SCC welcomes the additional commitments included in the 1.6.2 of the oCoCP (Revision C) in response to the changes to the AWI.</p> <p><i>Table B.2 Impact assessment including residual effects on ecology and biodiversity receptors during construction</i></p> <p>SCC welcomes the assurance that harm to Ancient Woodlands can be avoided through mitigation.</p> <p><i>Table B.3 Impact assessment including residual effects on ecology and biodiversity receptors during operation (and maintenance)</i></p> <p>SCC considers that bespoke operating procedures may need to be employed when undertaking vegetation management of AW such as Lodgefield Row (Section B), rather than standard procedures. The appropriate management should be agreed and overseen by the Ecology Working Group.</p>	<p>7.4 Outline Landscape and Ecological Management Plan – Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-032] sets out the bespoke mitigation strategy for ancient woodlands, including newly identified areas such as Lodgefield Row. The strategy already incorporates bespoke woodland-specific measures such as precise excavation techniques, the controlled storage of plant, equipment and excavated soils, and the micro-siting of works, in order to avoid or minimise impacts in accordance with the mitigation hierarchy. The final version of the Ancient Woodland and Veteran Tree Strategy secured via Requirement 4 as part of the Final Landscape and Ecological Management Plan, will be updated to include further specific details following detailed design.</p> <p>The Applicant has committed to setting up an Ecology Working Group, the remit of which is set out within the latest version of 7.4 Outline Landscape and Ecological Management Plan [Revision E]. Discussions with the Ecology Working Group could include specific management measures for Lodgefield Row Ancient Woodland.</p>
7.2	Landscape and Visual	Appendix C [REP3-059]	<p>SCC considers that the design should be amended at Lodgefield Row (alignment) and Wenham Grove (design of environmental area and access road) as far as necessary to avoid harm to the newly identified Ancient Woodlands.</p>	<p>See above response 5.20 and 6.2 in this document.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
8.1	Archaeology	<p>REP2-040 (1.1)</p> <p><i>"The purpose of the geophysical survey results report is to provide results and interpretation of the survey.</i></p> <p><i>The strategy for trial trenching and mitigation is outlined in the Written Schemes of Investigation (WSI) for the priority trial trenching areas and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be submitted into Examination.</i></p> <p><i>The Applicant has actively engaged with Local Planning Authorities and Historic England regarding 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] since submission of the DCO application. The Applicant has discussed progress on the ongoing geophysical survey and</i></p>	<p>SCC Archaeological Service requests that the Geophysical Report acknowledge the limitations of the chosen geophysical technique and state that archaeological trial trenching will be necessary to ground-truth the results. This does not require including a detailed trenching methodology in the geophysical survey report.</p>	<p>The geophysical survey report submitted at Deadline 4 [REP4-127] includes a short description of the limitations of magnetometry in Section 4.1.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<p>trial trenching, the approach to Phase 2 trial trenching and the programme for updates to 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] at meetings with Essex and Suffolk County Councils on 26 March 2026, with Norfolk County Council on 27 March 2026, and with representatives from Historic England, Thurrock Council and Essex, Suffolk and Norfolk County Councils, at the Archaeological Working Group Meeting on 1 April 2026.</p> <p>The Applicant is currently preparing an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] taking into account feedback received from stakeholders noted above as well as others. The updated document is scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review."</p>		
8.2	Archaeology	<p>REP2-040 (1.2) <i>"The Applicant acknowledges this and notes that the strategy for trial trenching is outlined in the WSIs for the priority trial trenching areas and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which is being updated and will be submitted into Examination and updated for the Phase 2 trial trenching."</i></p>	SCCAS notes and will await to review.	Noted - 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.
8.3	Archaeology	<p>REP2-040 (1.3) <i>"The Applicant has responded to this in its response to question HE 1.47 in 8.9.1 Applicant's Responses to First Written Questions [Revision A]."</i></p>	SCC Archaeological Service acknowledge the applicant's response to question HE 1.47 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and highlights the importance of trial trenching to ground-truth geophysical survey results.	The Applicant has acknowledged and incorporated the Respondent's comment in Ref 3.2 Geophysical Survey within 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] which has been submitted into Examination at Deadline 5.
8.4	Archaeology	<p>REP2-040 (1.4) <i>"The Applicant will update the interpretation section of 6.11.A4 Environmental Statement Appendix 11.4 – Geophysical Survey (Priority Areas) Results Report [AS-072 - AS-077] to take account SCC's comments. The updated document is scheduled for submission at Deadline 4."</i></p>	SCC Archaeological Service await the revised document before making further comment.	Noted. The geophysical survey report submitted at Deadline 4 [REP4-127] includes a short description of the limitations of magnetometry in Section 4.1.
8.5	Archaeology	REP2-040 (2.4 – 2.10)	SCC Archaeological Service can only comment further when full reports are submitted for review.	The assessment report for Site 008 was issued to the Applicant, and it is now back with the Archaeological

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<p><i>"Noted [that SCCAS will comment when the full report is submitted, as opposed to the interim report]. The Applicant will respond further when it receives SCCAS comments."</i></p>		<p>Contractor following the Applicant's review. The report will be issued to the Suffolk LPA archaeological advisor when reissued by the Archaeological Contractor.</p>
8.6	Archaeology	<p>REP2-040 (5.5 – 5.10, 5.15 – 5.16) <i>"The Applicant has responded to this in its response to question HE 1.46 in 8.9.1 Applicant's Responses to First Written Questions [Revision A]. This confirms that the Applicant is preparing an updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which is planned for submission at Deadline 5."</i></p>	<p>SCC Archaeological Service await the submission of an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] for review.</p>	<p>Noted – The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.</p>
8.7	Archaeology	<p>REP2-040 (5.5 and 5.8) <i>"The Applicant acknowledges the potential for sections of the Project to contain peat and alluvial deposits with the potential to mask deeply buried archaeological material. However, where such deposits are oversailed by the overhead line or are located outside areas of impact, no further evaluation work will be undertaken as there is no potential for physical impact. The results of 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214] and included in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] will be used to inform proposals for further geoarchaeological and palaeoenvironmental works, where such areas correspond with areas of known impact to deeply buried deposits. Provision for further geoarchaeological and palaeoenvironmental work in areas of impact is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which is currently being updated following comments received in Local Impact Reports and Written Representations. It is anticipated to be submitted at Deadline 5."</i></p>	<p>SCC Archaeological Service disagree with this statement "However, where such deposits are oversailed by the overhead line or are located outside areas of impact, no further evaluation work will be undertaken as there is no potential for physical impact." As this does not account for the potential impacts of haul roads and flood alleviation measures within the overhead sections. SCCAS await the submission the amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] to see if this document provides adequate provision for geoarchaeological and palaeoenvironmental assessment.</p>	<p>Noted – The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.</p>
8.8	Archaeology	<p>REP2-040 (5.7) <i>"The Applicant has already committed to undertaking evaluation of the areas of impact from the Project, and progress on this is well advanced, as set out in the Applicant's response to question</i></p>	<p>Please see SCCAS comments on Appendix A. Supplement 1 – 1.S8 Draft Development Consent Order (Table 10 below). SCCAS await the submission the amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written</p>	<p>The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
8.9	Archaeology	<p>REP2-040 (5.10)</p> <p><i>“The Applicant maintains the position that the level of fieldwork undertaken on this Project exceeds that of many other NSIPs and DCO submission stage and positively accepts SCCAS’s recognition of that. The Applicant also draws attention to the response to question HE 1.43 in 8.9.1 Applicant’s Responses to First Written Questions [Revision A] where it is detailed that the Priority trial trenching areas are due to be completed by the end of April 2026 and the Phase 2 trial trenching is programmed to commence in summer 2026 and is expected to be mostly complete by the end of 2026.</i></p> <p><i>The Priority trenching area comprises a total of 3,350 trenches. The exact number of trenches within the Phase 2 area is still subject to agreement with the Archaeological Advisors to the Local Planning Authorities but for the purpose of illustration a 2.5% sample of the Phase 2 area would represent 3,000 trenches.</i></p> <p><i>Together the Priority and Phase 2 trenching represent the same or greater level of coverage as achieved by the DCO’s quoted by SCCAS.</i></p> <p><i>As with the approach taken by Sizewell and quoted by SCCAS any outstanding trial trenching post-DCO for this Project will be secured through commitments made in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].”</i></p>	<p>Scheme of Investigation [APP-328] before we comment further, to see if the document contains adequate provision to deliver an appropriate programme of archaeological work.</p> <p>SCC Archaeological Service accept the applicant’s statements around the priority trenching. However, this is a large c.180km linear project, and priority area archaeological works to date only constitute a small proportion of the overall project impact area. SCCAS considers that there is sufficient archaeological work undertaken in the Suffolk Priority Areas to inform the principle of development for Suffolk. However, significant further archaeological evaluation is required across the remainder of the scheme to inform detailed engineering designs and a programme of archaeological mitigation.</p> <p>This must be secured by robust requirement wording and appropriate provision in an approved OAMS-OWSI.</p> <p>Full reports on geophysical survey and trial trenching are unlikely to be completed prior to determination of the application. Therefore, it is essential that the OAMS-OWSI and the requirement wording secure the delivery of full reports for all works undertaken as soon as they are available and set clear deadlines for their submission and review.</p> <p>It is in the applicant’s interest to complete the remaining archaeological evaluation (both geophysical survey and trial trenching) at the earliest opportunity to inform a mitigation programme.</p>	<p>The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5. The document sets out the Applicant’s commitment to completion of the Phase 2 archaeological trial trenching. The trial trenching will be carried out under the terms of the OAMS-OWSI and the applicable Detailed Written Scheme of Investigation (DWSI).</p>
8.10	Archaeology	<p>REP2-40 (5.11)</p> <p><i>“The Applicant has actively engaged with Local Planning Authorities and Historic England regarding 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] since submission of the DCO application. The Applicant has discussed progress on the ongoing geophysical survey and</i></p>	<p>SCCAS await the submission the amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] before we comment further.</p>	<p>Noted - 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<p><i>trial trenching, the approach to Phase 2 trial trenching and the programme for updates to 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] at meetings with Essex and Suffolk County Councils on 26 March 2026, with Norfolk County Council on 27 March 2026, and with representatives from Historic England, Thurrock Council and Essex, Suffolk and Norfolk County Councils, at the Archaeological Working Group Meeting on 1 April 2026.</i></p> <p><i>The Applicant is currently preparing an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] taking into account feedback received from stakeholders noted above as well as others. The updated document is scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review."</i></p>		
8.11	Archaeology	<p>REP2-040 (5.12) <i>"7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is currently being updated and will be submitted into Examination, anticipated for Deadline 5."</i></p>	<p>SCCAS await the submission the amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] before we comment further.</p>	<p>Noted - 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B] has been submitted into Examination at Deadline 5.</p>
8.12	Archaeology	<p>REP2-040 (5.13) <i>"The Applicant has responded to this in its response to question DCO 1.S8 in 8.9.1 Applicant's Responses to First Written Questions [Revision A]."</i></p>	<p>Please see SCCAS comments on Appendix A. Supplement 1 – 1.S8 Draft Development Consent Order (Table 10 below).</p>	<p>The Applicant has assumed that Table Item 10.5 is the relevant item as this item relates to Table Item 5.13 in [REP2-040] as referenced here. The updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision B], submitted at Deadline 5, states that an Updated Project Design (UPD) will be developed from the PXA's detailing a programme of full post-excavation analysis, reporting, publication and archive deposition.</p> <p>Please refer to the updated Requirement 5 wording in 3.1 Draft Development Consent Order [Revision E], submitted at Deadline 5, which sets out a process for post-excavation assessment, approval of an archaeological updated project design, post-excavation analysis, publication and archiving.</p>
8.13	Archaeology	<p>REP2-040 (5.17) <i>"An updated version of 7.2 Outline Code of Construction Practice (Rev B) (Revision C) has been submitted at Deadline 3. 7.5 Outline Archaeological Mitigation Strategy and Outline</i></p>	<p>Please see SCCAS comments on 7.2 Outline Code of Construction Practice (Rev B) (Revision C).</p>	<p>Please see the Applicant's responses to SCCAS's comments on 7.2 Outline Code of Construction Practice (Rev B) (Revision C) in Table 3 above: table items 3.3 to 3.9.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
8.14	Skills	<p><i>Written Scheme of Investigation [APP-328] is currently being updated and will be submitted into the examination.</i></p> <p>REP2-040 (5.29)</p> <p><i>“At this stage, the competence profile of the construction workforce is not available. However, it is anticipated that this information would become accessible following the appointment of the construction contractor. The assessment approach set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] is in line with other grid connection projects, including Yorkshire Green and Bramford to Twinstead Reinforcement.</i></p> <p><i>To provide an initial insight at the current design stage, the anticipated peak daily construction workers distribution throughout the construction phase in Suffolk is presented in Figure 2.2 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311].</i></p> <p><i>The cumulative effects on local employment and visitor accommodation bedspace are set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].”</i></p>	<p>SCC does not agree that the Applicant's response adequately addresses the concerns raised in respect of skills, education and employment. The Applicant's position that detailed workforce competence profiles will only be available following contractor appointment does not justify the absence of granular, phase-by-phase workforce and skills modelling at the Environmental Statement stage. SCC's Supplementary Guidance and EN-1 (4.3.12) require worst-case assumptions to be applied in advance of consent to assess labour demand, skills requirements and cumulative pressures, rather than deferring this analysis post-consent.</p> <p>SCC also does not accept that alignment with other grid connection projects is sufficient to demonstrate compliance with policy, nor that the presentation of peak daily worker numbers within the Outline Construction Worker Travel Plan provides an adequate basis for assessing skills demand, home- and non-home-based labour or impacts on local labour capacity. References to cumulative effects within Appendix 17.3 are similarly limited and do not address cumulative skills demand, displacement risks or interactions with other NSIPs. SCC therefore maintains that the lack of robust, phase-specific workforce and skills evidence represents a fundamental deficiency in the ES, and that further modelling, cumulative assessment and secured mitigation (through a DCO-secured Employment and Skills Plan) are required.</p>	<p>The assessment on labour demand, skills requirements and cumulative pressures has been undertaken by the Applicant and set out in the Environmental Statement (ES) within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].</p> <p>With regard to the labour demand, the Applicant has undertaken the construction workforce assessment as part of the ES submission and set out the projected total construction workforce number, peak construction workforce number and the split between local and non-local workforce numbers. The total construction workforce is projected to be approximately 4,800 throughout the four-year construction period, of which approximately 480 jobs will be local workforce and 4,320 will be non-local workforce. The maximum peak day construction workforce is anticipated to be approximately 1,720 full time equivalent, approximately 172 of which will be local workers and 1,548 will be non-local workers as reported in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The anticipated peak daily construction worker distribution in Suffolk in each quarter from 2027 to 2031 is also available in Figure 2.2 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision B].</p> <p>With regard to skills requirements, paragraph 15.7.13 of the 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] set out that majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines and are typically sourced from National Grid's existing pool of approved contractors, which forms the 90% non-local workforce. It also states that a minimum 10% of the local workforce are likely to be security workers and delivery drivers.</p> <p>With regard to the cumulative assessment, the cumulative workforce demand assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].</p> <p>With regard to secured mitigation through a DCO-secured Employment and Skills Plan, the Applicant is preparing an Employment and Skills Plan, which will be submitted in Deadline 5.</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
8.15	Skills	<p>REP2-040 (5.29)</p> <p><i>“The Applicant recognises the importance that host communities and host authorities place on social value including employment opportunities, skills development and local supply chain participation associated with a project of this scale and duration. The Applicant also acknowledges that a number of Local Impact Reports express concern about the absence, at application stage, of a single consolidated document setting out how these matters would be approached in practice. In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant’s position that such matters do not constitute mitigation, National Grid now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.”</i></p>	<p>While SCC welcomes the proposal to submit an Employment and Skills Plan at Deadline 5, SCC remains concerned that this is framed as a voluntary exercise “without prejudice” to the Applicant’s position that such matters do not constitute mitigation. SCC does not accept this characterisation, the Examining Authority’s approach in the Sea Link examination demonstrated that robust, phase-specific workforce assessment and a secured Skills and Employment Strategy are integral to managing socio-economic effects, particularly where construction workforce demand is significant. Given that Norwich to Tilbury is materially larger than Sea Link in workforce terms, SCC maintains that any Employment and Skills Plan must be informed by detailed, phase-specific workforce and skills modelling, address cumulative NSIP labour pressures, be developed through appropriate regional governance arrangements and be secured through the DCO with clear monitoring and reporting.</p>	<p>The Applicant notes Suffolk County Council’s comments but does not agree with the characterisation of the Employment and Skills Plan as mitigation for significant socio-economic effects.</p> <p>The Applicant has submitted 8.13 Outline Employment and Skills Plan [Revision A] into the Examination at Deadline 5, which establishes the framework for delivery of employment, skills and supply chain opportunities associated with the Project. As set out in 8.13 Outline Employment and Skills Plan [Revision A], its purpose is not one of mitigation, but to support and maximise Project-related benefits. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] does not identify any significant adverse socio-economic effects arising from the Project, including in relation to construction workforce demand. With regard to the cumulative assessment, the cumulative workforce demand assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].</p> <p>8.13 Outline Employment and Skills Plan [Revision A] is not intended to undertake a detailed assessment of workforce demand or labour market impacts. Instead, it provides a proportionate framework, with further detail to be developed post-consent.</p> <p>The Applicant has committed to preparing a Final Employment and Skills Plan, to be secured through DCO requirement four, which will set out more detailed arrangements for delivery, including governance, engagement with relevant regional partners, and monitoring and reporting.</p> <p>The Applicant considers that this staged approach is appropriate and proportionate, allowing the final measures to be informed by confirmed construction programmes, procurement strategies and contractor inputs.</p>
8.16	Skills	<p>REP2-040 (5.29)</p> <p><i>“The current workforce data reported in the ES has been generated from the traffic model produced for the Project with a worst-case scenario applied. As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5 which will be secured by way of a DCO Requirement to be added into an updated version of the Draft DCO alongside the</i></p>	<p>SCC considers that reliance on transport modelling does not provide the granular, phase-specific labour and skills analysis required to understand workforce composition, skills demand, cumulative NSIP pressures or the associated impacts on accommodation, transport, public services and labour markets. The experience at Hinkley Point C demonstrates the risks of underestimating construction workforce requirements and the significant consequences that can arise where initial labour modelling is insufficiently robust.</p> <p>While SCC welcomes the Applicant’s proposal to prepare an Employment and Skills Plan and to secure this through</p>	<p>The assessment on labour demand, skills requirements and cumulative pressures has been undertaken by the Applicant and set out within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].</p> <p>With regard to the labour demand, the Applicant has undertaken the construction workforce assessment as part of the ES submission and set out the projected total construction workforce number, peak construction workforce number and the split between local and non-local workforce numbers. The total construction workforce is projected to be approximately 4,800 throughout the four-</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<p><i>submission of the Employment and Skills Plan. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project."</i></p>	<p>a DCO Requirement, SCC maintains that such a plan must be underpinned by comprehensive, phase-specific workforce and skills modelling in line with SCC's Supplementary Guidance and EN-1 expectations. Without this evidence base, the adequacy of the ES cannot be demonstrated and the socio-economic effects of the scheme cannot be properly assessed, monitored or mitigated. SCC therefore continues to require robust labour modelling to inform a DCO-secured Employment and Skills Plan.</p>	<p>year construction period, of which approximately 480 jobs will be local workforce and 4,320 will be non-local workforce. The maximum peak day construction workforce is anticipated to be approximately 1,720 full time equivalent, approximately 172 of which will be local workers and 1,548 will be non-local workers, as reported in the 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. The initial anticipated peak daily construction workers distribution in Suffolk in each quarter from 2027 to 2031 is also available in Figure 2.2 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision B].</p> <p>With regard to skills requirements, paragraph 15.7.13 of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] sets out that the majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines and are typically sourced from National Grid's existing pool of approved contractors, which forms the approximately 90% non-local workforce. It also states that a minimum 10% of the local workforce are likely to be security workers and delivery drivers.</p> <p>With regard to the cumulative assessment, the cumulative workforce demand assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].</p>
8.17	Skills	<p>REP2-040 (5.30)</p> <p><i>"At this stage, the competence profile of the construction workforce is not available. However, it is anticipated that this information would become accessible following the appointment of the construction contractor. The assessment approach set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] is in line with other grid connection projects, including Yorkshire Green and Bramford to Twinstead Reinforcement.</i></p> <p><i>As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to</i></p>	<p>SCC remains of the view that the Applicant's position that workforce competence profiles are not available prior to contractor appointment is not a sufficient justification for relying on a generic assumption derived from experience on other projects. This approach conflicts with SCC's adopted Supplementary Guidance and EN-1 expectations, which require applicants to assess the changing influx of workers across different construction phases using reasoned, evidence-based assumptions, including likely worst-case scenarios where details are not yet fixed. Alignment with other grid connection projects does not demonstrate policy compliance or provide project-specific evidence of local labour capacity, skills availability or cumulative NSIP pressures.</p> <p>While SCC welcomes the Applicant's proposal to prepare an Employment and Skills Plan at Deadline 5, SCC maintains that such a plan must be informed by robust, phase-specific workforce and skills modelling, developed through appropriate regional governance arrangements such as the Regional Skills Coordination Function and</p>	<p>With regard to the initial insight of the construction workforce competence profile, paragraph 15.7.13 of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] sets out that the majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines and are typically sourced from National Grid's existing pool of approved contractors, which forms the approximately 90% non-local workforce. It also states that a minimum 10% of the local workforce are likely to be security workers and delivery drivers.</p> <p>With regard to the changing influx of workers across different construction phases, the initial worst-case anticipated peak daily construction worker distribution in Suffolk in each quarter from 2027 to 2031 is available in Figure 2.2 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision B].</p> <p>With regard to reasoned and evidence-based assumptions, the ES local employment assessment's assumptions are</p>

Table 8: 8.4.8 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]

Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments	Applicant's Comments
		<i>employment, skills, training and supply chain engagement during construction of the Project.</i>	secured through the DCO. Without this evidence base, the continued reliance on a blanket 10% assumption undermines the assessment of displacement, wage pressure, cumulative impacts and linked topics.	<p>based on Hinkley C Connection Project and Richborough Connection Project as set out in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>With regard to local labour capacity and skills availability, a baseline study has been undertaken in the ES, and set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], paragraphs 15.5.1 to 15.5.15.</p> <p>With regard to the cumulative assessment, the cumulative workforce demand assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284].</p>
8.18	Skills	<p>REP2-040 (5.31)</p> <p><i>"Cumulative effects from the Project are reported in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281], including local employment.</i></p> <p><i>The projected construction employment is to be employed across the approximately 180 km route. The projected peak construction workforce for the project is 1,720 employees, representing less than 3% of the total construction workforce in the Wider Study Area. Alternatively, the cumulative construction employment over a four-year period is estimated at 4,800 workers, equating to less than 10% of the total construction workforce in the area.</i></p> <p><i>Given these proportions, the overall contribution of the project to construction sector employment within the Wider Study Area is considered minimal and is considered not significant."</i></p>	<p>SCC considers that the use of headline percentage figures for project workforce and comparison to the Wider Study Area does not constitute a robust cumulative assessment. This approach fails to examine how the Project's workforce demand overlaps temporally and by skill type with other NSIPs and major infrastructure projects, nor does it assess displacement risks, wage pressures or pressure on specialist labour markets. SCC's adopted Supplementary Guidance requires cumulative labour needs to be assessed both alone and in combination with other projects, including phase-specific analysis and consideration of worst-case home-based labour draw, informed through appropriate regional governance such as the Regional Skills Coordination Function. EN-1 similarly recognises that concurrent NSIPs may give rise to short-term labour shortages, irrespective of the proportion of the overall workforce represented by a single scheme. SCC therefore maintains that the Applicant's reliance on percentage-based comparisons and dispersed route geography does not provide the evidence needed to discount cumulative effects on skills, education and employment. Further quantitative, phase-based cumulative labour assessment is required before a conclusion of non-significance can be supported.</p>	<p>The assessment approach set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] and 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] is in line with other grid connection projects, including Yorkshire Green and Bramford to Twinstead Reinforcement.</p> <p>The assessment approach and elements to be assessed are in line with 6.19 Scoping Report - Appendix A - Parts 1 to 8 [APP-288 to APP-295] and 6.20 Scoping Opinion [APP-297]. The assessment appropriately considers the scale of the Project in the context of the wider labour market and relevant committed developments, and does not identify evidence of significant cumulative effects.</p> <p>The assessment is considered proportionate and in line with other DCO cumulative assessment applications, such as Sea Link.</p>
8.19	Skills	<p>REP2-040 (5.32)</p> <p><i>"As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project."</i></p>	<p>While SCC welcomes the Applicant's proposal to submit an Employment and Skills Plan at Deadline 5, this does not address the fundamental issue that the Applicant has not engaged with, nor committed to working through, the Regional Skills Coordination Function, which SCC's adopted Supplementary Guidance identifies as the primary mechanism for coordinating labour demand, developing skills pipelines and managing cumulative impacts arising from multiple concurrent NSIPs. The preparation of an Employment and Skills Plan in isolation does not provide an equivalent governance or coordination arrangement</p>	<p>The Applicant acknowledges Suffolk County Council's comments regarding the Regional Skills Coordination Function (RSCF). The Applicant has submitted 8.13 Outline Employment and Skills Plan into the Examination at Deadline 5, within which the Applicant recognises the role of the RSCF in coordinating workforce planning across Suffolk and confirms that it will engage with the RSCF to provide workforce profiling information, including the number, type and duration of roles and associated skills</p>

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			<p>and, in the absence of clarity on its evidence base, scope, monitoring arrangements or securing mechanism, does not resolve SCC’s concerns. SCC further maintains that reliance on voluntary community benefit approaches, as identified within ES Chapter 15, cannot be treated as socio-economic mitigation, as such measures are not secured through the DCO, are not aligned to construction phasing, and do not provide assurance that cumulative labour pressures will be anticipated or managed.</p>	<p>requirements, in advance of construction to support alignment with other infrastructure projects.</p> <p>However, the Applicant does not agree that participation in, or delivery through, a specific regional governance mechanism is required to demonstrate the adequacy of the ES or to mitigate effects. The assessment of labour demand, skills requirements and cumulative effects has been undertaken on a proportionate basis and is set out in 6.15 Environmental Statement Chapter 15 [APP-265] and 6.17.A3 Environmental Statement Appendix 17.3 [APP-284].</p> <p>The Applicant has committed to preparing a Final Employment and Skills Plan, to be secured through a DCO requirement, which will set out more detailed arrangements for delivery, including governance, engagement with relevant regional partners, and monitoring and reporting.</p> <p>The Applicant considers that this staged approach is appropriate and proportionate, allowing the final measures to be informed by confirmed construction programmes, procurement strategies and contractor inputs.</p>

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