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Norwich to Tilbury

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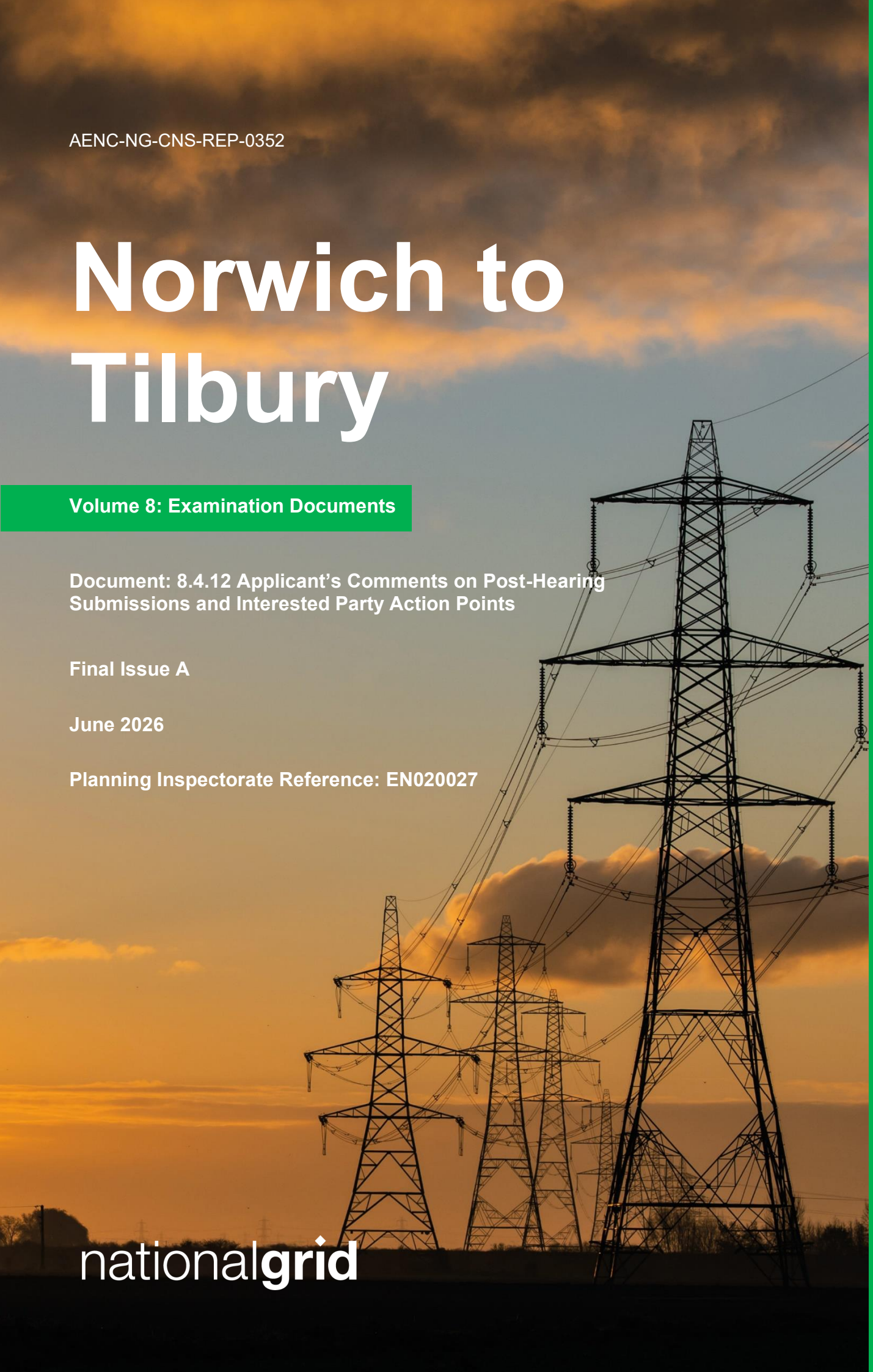

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Appendix A Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury

1. About this Document

1.1 Introduction

1.1.1 This document relates to hearing action points and post-hearing summaries of oral case following hearings held between 28 April 2026 and 1 May 2026. These were Issue Specific Hearing 2 (ISH2) and Compulsory Acquisition Hearing 2 (CAH2).

1.1.2 The Applicant submitted its post-hearing summaries of oral case at Deadline 4 (12 May 2026) and also provided a response to hearing action points arising from those hearings. These were provided in the following documents:

- **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**
- **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**
- **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**
- **8.5.9 Applicant's Response to Compulsory Acquisition Hearing 2 Action Points [REP4-304]**

1.1.3 In some instances, the Applicant committed at Deadline 4, within the above documents, to providing a further update or response to hearing action points at Deadline 5.

1.1.4 At Deadline 4, Interested Parties (IPs) and Affected Parties (APs) also submitted their post-hearing summaries of oral case, and responded to any hearing action points as relevant.

1.1.5 This document therefore provides:

- An update from the Applicant on any hearing action points that were committed to for Deadline 5
- The Applicant’s comments on any submissions made by IPs or APs in their response to hearing action points.
- The Applicant’s comments on the summaries of oral case submitted by IPs or APs in respect of ISH2 or CAH2.

1.1.6 The Applicant notes that some summaries of oral case were made by IPs or APs who did not speak at the hearing on the day. These are included in this document where clearly identified within the submission as relating to the hearing. Other written submissions by IPs or APs that did not identify a specific relation to the hearings are responded to in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4** also submitted at Deadline 5.

1.2 Structure of this Report

1.2.1 The document is ordered as follows:

- Section 2: Applicant's Update on its Response to ISH2 Hearing Action Points
- Section 3: Comments on Interested Parties' Responses to Hearing Action Points
- Section 4: Comments on Summaries of Oral Case from ISH2
- Section 5: Comments on Summaries of Oral Case from CAH2
- Appendix A: Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury

2. Applicant's Update on its Response to ISH2 Hearing Action Points

2.1 Overview

2.1.1 The tables below provide the Applicant's update to its responses to ISH2 Hearing Action Points, where the Applicant committed to providing further information at Deadline 5. This provides the Applicant's original response at Deadline 4 and our update at this deadline.

2.2 ISH2 Action Point 1

Table 2.1 Applicant's update to ISH2 Action Point 1

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 1 *Percussive/ non-percussive piling - Provide examples of the types of ground conditions where percussive piling is needed and provide an indication of the likelihood of use for this project.*	At this stage, specific piling solutions have not been defined and will be determined following detailed geotechnical investigations and subsequent design development. As such, the likely extent of percussive piling cannot be confirmed at present. By way of context, percussive piling (e.g. driven piles) may be required in ground conditions where softer or variable strata overlie denser load-bearing strata, or where high load capacities are needed and alternative methods are not practicable. This can include as examples, made ground, alluvial deposits or soft cohesive soils underlain by competent granular or rock strata. Notwithstanding this, percussive piling is not the Applicant's preferred method of installation, and where feasible, non-percussive techniques (such as bored or augered piles) would be prioritised to minimise noise and vibration effects. The Applicant is seeking statistics from other projects by way of comparison and will provide this information at Deadline 5, however it is important to note that these statistics may not be representative of this Project given potentially different ground conditions.	The Applicant has consulted with the Great Grid Partnership (the Applicant's delivery partner) who have reiterated the position stated at Deadline 4 that the likely extent of percussive piling cannot be confirmed until ground investigation studies have been completed. They have however confirmed that when looking at assumptions for the construction methodologies for the Project, a best case scenario predicts no percussive piling for pylon foundations, whilst a worst case scenario predicts 20% of pylon foundations requiring percussive piling. The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, which is currently under construction, assessed percussive piling as the worst-**case scenario and has to date not used percussive piling techniques on any of the pylon foundations.** The National Grid (Bramford to Twinstead Reinforcement) Order 2024 has recently completed the discharge of pre-commencement requirements for its first stage so as yet no works on foundations have commenced.

2.3 ISH2 Action Point 19

Table 2.2 Applicant's update to ISH2 Action Point 19

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 19 *Schedule 4 Discharge of requirements* *The Applicant and local authorities are both to provide a response to the ExA questions and comments including an update by Deadline 5 (Wednesday 10 June) regarding post-discharge functions and the*	As requested, the Applicant will respond to this action at Deadline 5.	The Applicant's position was set out in response to question DCO 1.S19 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** where it confirmed that it will continue to keep the matter under review as the Government's proposals evolve. The Applicant has included its proposed drafting in **Appendix A** of this document**,** following engagement with the host Local Authorities at meetings held on 21 May and 4 June 2026. The proposed DCO drafting included in the '9.154 Approach to Adopting DESNZ Requirement Discharge Unit for Sea Link' document[1] submitted to the Sea Link Examination on 24 April 2026 was not shared with DESNZ in advance. They would

[1] Document [AS-167] of Sea Link Examination Library

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
involvement of the Department of Energy Security and Net Zero (DESNZ), following the related submissions at the final deadline of the Sea Link examination. Enquiries are to be made whether DESNZ has been consulted or provided comments regarding the draft wording of the relevant schedule in the Sea Link draft DCO.		have had visibility of it at the same time as others when it was published on the Planning Inspectorate's Project Page.

2.4 ISH2 Action Point 25

Table 2.3 Applicant's update to ISH2 Action Point 25

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 25 *Limits of Deviation 1* *Local authorities to identify the most sensitive locations and specific viewpoints that they would like to see additional visuals of pylons within the LoD (so as to further illustrate the worst case scenario). The list of viewpoints is to be agreed as soon as possible with the Applicant, and submitted by the Applicant at Deadline 4 (Tuesday 12 May). The Applicant is to submit the agreed visuals by Deadline 5 (Wednesday 10 June)*	The Applicant is proactively engaging with local authorities to seek to agree a shortlist of the most sensitive locations and viewpoints. The long list below has been provided by local authorities up to and including 11 May. The Applicant is unable to confirm an agreed short list for Deadline 4 due to the limited timeframe and engagement required with the relevant local authorities. The long list below is being reviewed and will be discussed further with local authorities with a view to the Applicant agreeing a proportionate list and submitting corresponding visuals at Deadline 5 (Wednesday 10 June). • South Norfolk and Broadland District Council: Viewpoint 1.01, Viewpoint 1.04, Viewpoint 1.15, Viewpoint 1.22, HE2a, HE2b and HE21. • Suffolk County Council & Babergh and Mid Suffolk District Council: Viewpoint 2.05, Viewpoint 2.14, Viewpoint 2.16, Viewpoint 2.28, HE3 and HE24. • Essex: Viewpoint 4.21, Viewpoint 7.01, Viewpoint 7.03, Viewpoint 7.09, HE11, HE12, HE26, HE28, HE32, HE37, HE38 and HE42. • Braintree District Council: Residential Visual Amenity Assessment (RVAA) wireline for E7 West Ford Farm	A number of responses related to Limits of Deviation (LoD) have previously been provided in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, as follows: • Responses to Items Alt 1.8 and CA1.21 provide reasons why LoD are needed and the fact the design is still subject further detailed design. • The response to DCO 1.A16 provides information on the heights of conductor and earthwire and LoD. • Multiple historic environment and landscape and visual responses relate to consideration of LoD including: HE1.10; LV 1.5; LV 1.8; LV 1.9; and LV 1.12. The Applicant reiterates the position set out in Deadline 4 documents including Item Alt 1.9, on page 118 onwards of **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** and Action point 26 on page 25 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303].** The position being that the landscape and heritage visualisations are based on the pylon locations as shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]**, as this is considered the most likely route to come forward. As set out in the Applicant's response to Alt 1.9, on page 118 onwards of **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** the **Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]** applies assumptions to assess worst-case scenarios and assesses the LoD within the 'sensitivity testing' section of each environmental topic chapter. This approach ensures that the Project and all its possible permutations have been assessed, and no reassessment is required should the LoD be used during detailed design. The Limits of Deviation are provided for all pylons, noting that in some locations the flexibility to change the design is limited where the Applicant has outlined prescriptive restrictions to the Limits of Deviation within commitment GG34 in Table 6.1 of **7.2 Outline Code of Construction Practice [REP4-165]**. As set out in the Applicant's response to LV 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** the LoD is incorporated into the Project to allow for the adjustment to final positioning (and height) of pylons to avoid localised constraints or unknown or unforeseeable issues that may arise, such as poor ground conditions or archaeological finds, as detailed in Table 4.3 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. A number of factors would need to be considered in the balance when considering any potential changes within the LoD. There would theoretically be multiple positions where the pylons could move to within the LoD, because if one pylon moved laterally or longitudinally it could affect the position of the surrounding pylons. The Applicant also notes that although a pylon may move closer in one view, it may be further away in a different view, and overall, the effects would be likely to balance out in most cases. Notwithstanding the above, the Applicant has reviewed the "long list" of suggested viewpoint locations submitted by the local authorities in response to Deadline 4 and has considered how a proportionate exercise of producing a form of further

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
	Cottage and RVAA wireline for E8 Whiteheads Farm. • Colchester City Council: Viewpoint 4.01, Viewpoint 4.08, Viewpoint 4.11, Viewpoint 4.16, Viewpoint 4.24, Viewpoint 4.37 and Viewpoint 4.38. • Tendring District Council: Viewpoint 3.11, Viewpoint 3.31 and HE25.	visualisations for those areas can be provided to demonstrate how the pylons may appear if LoDs were utilised. It has not been possible for the Applicant to produce new photomontages in the timescales available. This would require sections of the Project to be redesigned, modelled in 3D software and then photomontages generated. The Applicant has prepared Limit of Deviation (LoD) visualisations from the following short list of viewpoint locations and these are provided in **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations [Revision A].** For each viewpoint there is a location map followed by baseline photograph, photomontage showing the Project design and photomontage overlain with the LoD information, for each 90 horizontal field of view available from the viewpoint: • South Norfolk and Broadland District Council: Viewpoint 1.22, HE2(i), HE2(ii) and HE21. • Suffolk County Council & Babergh and Mid Suffolk District Council: Viewpoint 2.28 and HE24. • Essex County Council: Viewpoint 4.21, HE11, HE12(i), HE26, HE28, HE37, HE38 and HE42. • Braintree District Council: Residential Visual Amenity Assessment (RVAA) wireline for E7 West Ford Farm Cottage and RVAA wireline for E8 Whiteheads Farm. • Colchester City Council: Viewpoint 4.01, Viewpoint 4.08, Viewpoint 4.11, Viewpoint 4.24 and Viewpoint 4.37. • Tendring District Council: Viewpoint 3.11, Viewpoint 3.31 and HE25. • In addition, an LoD visualisation has been prepared for the RVAA wireline for F10 Windmill House. Locations with close views of the Project were included. The Applicant considers that changes in the Project, within the LoD, would not be noticeable in longer distance views due to the reducing scale of the Project and perspective. A visualisation is provided from Viewpoint 4.01 (approximately 1.16 km from the Project) in **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations [Revision A]** to demonstrate this point. Visualisations were therefore not taken forward for the following viewpoints: 1.01; 1.04; 2.05; 2.14; 2.16; 4.16; 4.38; 7.01; 7.03; 7.09; HE3; HE32 Other locations were not provided due to duplication in location such as Viewpoint 1.15 which is similar to HE2(ii) and Viewpoint 4.24 was selected over suggested an optional alternative of 4.25 as suggested by Colchester City Council. The LoD visualisations illustrate the following information, overlain on the existing photomontage or wireline: • A dashed green line runs along the ground to indicate the outer extent at which the pylon could be placed closer to the viewpoint (lateral LoD). This dashed line also provides an understanding of the longitudinal movement theoretically possible. For the lateral LoD, typically this distance is 30 m from the existing centreline. The remaining 20 m of the LoD accounts for conductor sway. Further detail on this is provided on page 2 of **2.6.2 Design and Layout Plans - Overhead Lines [APP-042]**. • A dashed blue line represents the reasonable worst case scenario in relation to the height a pylon could appear (vertical LoD) if it were positioned at the outer extent of the lateral LoD. The blue dashed line representing height, is based on an average height of all pylons within the field of view of the viewpoint, plus 6 m. This proportional approach takes into account potential longitudinal, lateral and vertical change within the LoD. • Both the green and blue dashed lines take account of degree of visibility, and are masked out where they go behind vegetation, buildings or terrain. • Pylon silhouettes are placed at the outer extent of the lateral LoD at the side of the Project closest to the viewpoint. These are provided as an indicative visual representation of potential movement for ease of understanding. The Applicant notes that the silhouette has a more solid appearance than a lattice pylon would have in reality. This is because steel lattice pylons have a degree of visual permeability. The pylons could move laterally, longitudinally and increase in height within the LoD; however, it is not considered proportionate to provide multiple illustrations to demonstrate the theoretical number of permutations that could occur. The Applicant has reviewed the additional LoD visualisations prepared for this Action Point and confirms that the judgements in Section 13.9 Sensitivity Testing of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** remain fair and reasonable.

2.5 ISH2 Action Point 27

Table 2.4 Applicant's update to ISH2 Action Point 27

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 27 *ExQ LV 1.28 and masterplans Masterplans to be provided at the next deadline, with an agreed position in terms of compensation measures for residual effects on the specified landscapes by Deadline 5 (Wednesday 10 June).*	The Applicant notes this action and is already engaging with the local authorities to provide a response to this request for Deadline 5 as confirmed during ISH2. It has not been possible to provide plans for Deadline 4 due to the limited timeframe and engagement required with the relevant local authorities. The Applicant has set out its position on the policy relating to landscape compensation in its response to LV1.28 and at ISH2, and the Applicant's approach to this action will be taken forward in that context.	The Applicant has proactively engaged with Local Planning Authorities to discuss this matter. Co-ordinated plans have been submitted in **8.4.12.2 Response to ISH Action Point 27 – Masterplans [Revision A]**.

2.6 ISH2 Action Point 28

Table 2.5 Applicant's update to ISH2 Action Point 28

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 28 *Waveney Valley Provide more information on the technical reasons for other pylon types being discounted. Local authorities to provide further comments in writing in response to the discussion regarding the setting of St Remigius Church.*	The Applicant provided its findings regarding the potential use of low height lattice pylons in **5.15 Design Development Report [APP-122]** in paragraph 4.6.11. This noted that the potential to use low height lattice pylons was restricted to only a very limited number of locations due to their not being compatible with larger changes of direction (angle of direction change having to be less than 30 degrees). This also noted their continued visibility above trees and potential detrimental change for users of recreational routes with potential additional tree removal required due to the greater crossarm width. Similar consequences and limitations occur with respect to T-pylons (which are similarly restricted to 30-degree change of direction) but there are also additional effects, given that the solid monopole structures have a greater degree of visual contrast with the landscape than lattice pylons, especially against a darker backdrop of trees and landform. In contrast the lattice tower structures are more transparent, given the steelwork is relatively slim. In both cases there is little material change in landscape and community effects from height reductions; arguably greater effects due to the contrast in colour and form of T-pylons with both being less consistent with Holford Rule 3 (use fewest possible angle pylons) than standard lattice pylons. The Applicant will submit visualisations of T-pylons at Deadline 5 (Wednesday 10 June). The visualisations will relate to Viewpoint 1.22 and HE2ii to illustrate how T-pylons would appear in views related to the setting of St Remigius Church.	T-pylon visualisations from Viewpoint 1.22 and HE2(ii) have been submitted for Deadline 5. Please refer to **8.4.12.3 Response to ISH Action Point 28 – T-Pylon Visualisations [Revision A]**.

2.7 ISH2 Action Point 44

Table 2.6 Applicant's update to ISH2 Action Point 4

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 44 *Joint working with other projects Consider widening or replication of the Essex developer forum format for all authorities in the area and also consider the inclusion of relevant parish councils and provide details of how this might work and how it would be secured.*	The Applicant has updated Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision C]** to include a commitment to engage with other forums set up and managed by other Local Highway Authorities. The Applicant will engage with the LHAs to understand the suitable forums which could be used to communicate (including the Planning and Infrastructure Working Group (Ardleigh and Little Bromley)) relevant information throughout the construction period. The Applicant will provide an update at Deadline 5. The Applicant will include before the end of examination additional detail on the coordination and collaboration within Section 6.6 in later iterations of **7.3 Outline Construction Traffic Management Plan [Revision C]**, which is secured through Requirement 4 of Schedule 3 of **3.1 Draft Development Consent Order [Revision D].**	The Applicant is continuing to engage with the LHAs on this matter, and will provide an update within later iterations of **7.3 Construction Traffic Management Plan**, prior to the end of the examination.

2.8 ISH2 Action Point 46

Table 2.7 Applicant's update to ISH2 Action Point 46

Hearing Action Point	Applicant Response at Deadline 4	Applicant Update
ISH2 Action Point 46 *Non-primary access routes (PARs) Applicant and Suffolk County Council to discuss the inclusion of non-PARs in the outline construction traffic management plan (CTMP) and the assessment of environmental effects, and provide further written comments to summarise the issue and discussions to date.*	The Applicant notes this action and will liaise with Suffolk County Council and provide a response at Deadline 5.	The Applicant held discussions with Suffolk County Council in a meeting to discuss Statements of Common Ground (SoCG) held on 1 June 2026, where discussions focused primarily on the other traffic and transport elements of the SoCG. The Applicant has responded on the subject of non-PARs in Item 11.4e of **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]**. The Applicant has scheduled an additional meeting with Suffolk County Council for 17 June, where "Under discussion and Not Agreed" items within the SoCG (expected to include the non-PARs) will be discussed. The Applicant has provided an update within **5.9.6 Draft Statement of Common Ground – Suffolk County Council (SCC) [Revision D]**.

3. Comments on Interested Parties' Responses to Hearing Action Points

3.1 Overview

3.1.1 The tables below provide the Applicant's comments on responses to hearing action points submitted by third parties. Please note that in many cases the same or materially similar response was submitted by multiple Interested Parties (IPs), particularly in the case of local authorities. Where this occurs, all IPs are listed in column 2, however the response provided is verbatim from the first listed IP. Duplicate responses from other IPs are not provided in this document for ease of the reader, however the Applicant's response should be read as applying to all listed IPs for that response.

3.2 ISH2 Action Point 1

Table 3.1 Applicant's Comments on IP Responses to ISH2 Action Point 1

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 1 *Percussive/ non-percussive piling - Provide examples of the types of ground conditions where percussive piling is needed and provide an indication of the likelihood of use for this project.*	**Thurrock Council [REP4-338]**	The Applicant has confirmed that the construction noise and vibration assessment assume the use of percussive piling at all pylon locations as a worst-case assessment scenario. This approach is accepted as an appropriately precautionary basis for assessment. The Applicant has further stated that, in practice, percussive piling would not be used where it can reasonably be avoided and that alternative construction methodologies would be considered following detailed assessment. It is acknowledged that there may be locations where percussive piling is required due to site specific ground conditions or engineering constraints but should not be the default option (which is confirmed by the Applicant).	The agreement of Thurrock Council on this matter is acknowledged and welcomed. This is reflected in **5.9.4 Draft Statement of Common Ground - Thurrock Council (TC) (incl LLFA and Highways) [Revision D]** submitted at Deadline 5.

3.3 ISH2 Action Point 2

Table 3.2 Applicant's Comments on IP Responses to ISH2 Action Point 2

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 2 *Use of term 'where practicable' All local authorities: Provide a response to the applicant's answer to first written question (ExQ1) NV1.6 and follow up to hearing discussion regarding use of the term 'where practicable' and whether commitment NV23 in the outline code of construction practice*	**Braintree District Council [REP4-323]**, **Brentwood Borough Council [REP4-324]**, **Chelmsford City Council [REP4-326]**, **Colchester City Council [REP4-327]** and **Essex County Council [REP4-328]**	The Council would like to note that the use of 'where practicable' or other similar phraseology in the DCO and in any control documents is unacceptable. Such phrasing lacks precision and is unenforceable. Terms with ambiguity wholly undermine the relevant section of the DCO or control document and therefore render that document unenforceable and undermines the underlying purpose of the document. NV23 states that 'For the construction of pylon foundations, non-percussive piling methods will be used where practicable'. This is wholly unacceptable and could result in percussive piling being used in all foundations for all pylons if the Applicants decided this was the most practical option for them. This is not a satisfactory solution and does not provide LPAs with the certainty that they need to protect the amenity of their residents.	The Applicant acknowledges the feedback from the Council and a number of uses of the term 'where practicable' were removed from the environmental management plans, including the removal of the term from commitment NV23 in **7.2 Outline Code of Construction Practice [REP4-164]** at Deadline 4. However, the Applicant's position remains that the remaining use of 'where practicable' within the outline control documents is necessary in each instance of its use. The is set out in the Applicant's response to SET 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074],** the Applicant's response to IP's responses to SET 1.5 on page 334 of **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299], 7.2 Outline Code of Construction Practice [REP4-164]** (which supersedes previous versions) and the Applicant's responses to the Examining Authority's written questions 2.G1.

Hearing Action Point	Interested Party	Response	Applicant Comment
(CoCP) would be adequate.	**South Norfolk District Council [REP4-334]**	SNDC reiterate our position that percussive piles should only be used as a last resort and their use must only be permitted with the consent of the appropriate local authority.	
	Tendring District Council [REP4-337]	TDC maintains that the use of the term “where practicable”, or similar wording, within the DCO and associated control documents is unacceptable. Such phrasing lacks precision and is unenforceable, as it relies on subjective judgement. It results in confusion and lack of certainty for local residents/affected communities, and it creates a significant risk that compliance can be avoided on the basis that it was deemed “not practicable”, undermining the effectiveness of the controls. In relation to NV23, as drafted, it allows the Applicant to rely on percussive piling in all instances if they consider it more practicable. This provides no certainty for TDC and its affected communities, and fails to ensure appropriate protection of residential amenity.	
	Thurrock Council [REP4-338]	From a noise and vibration perspective, the term “where practicable” introduces a degree of flexibility which could weaken the effectiveness of the commitment if not supported by clear justification and evidence. The Council would like to note that the use of ‘where practicable’ or other similar phraseology in the DCO and in any control documents is unacceptable. The use of percussive piling should be robustly justified through site-specific assessment. NV23 would be considered acceptable provided that lower noise and lower vibration techniques have been prioritised and the use of percussive piling is limited only to locations where non-percussive methods are demonstrably not possible. Additionally, Best Practicable Means are always applied in accordance with BS5228 and Section 72 of the Control of Pollution Act 1974; and appropriate mitigation, monitoring and community liaison measures are secured through the final CoCP and NVMP.	
	Chelmsford City Council [REP4-326]	*[In addition to the above, CCC makes two further points:]* What happens if there is disagreement between the enforcing authority and their contractors as to whether something is ‘practical’ or not?	In the event of disagreement between the enforcing authority and the Applicant as to whether a measure was “practicable” in a particular circumstance, the Applicant considers that there are established appropriate mechanisms within **3.1 Draft Development Consent Order [Revision E]** to resolve such matters. <u>Discharge stage</u> Where the question of what is “practicable” arises in the context of the discharge of a Requirement, the matter would be addressed through the formal discharge process. If agreement cannot be reached, the matter would be considered through the appeal mechanism in Schedule 4 (Discharge of Requirements) of **3.1 Draft Development Consent Order [Revision E]**. In practice, the Applicant would be required to demonstrate, with appropriate evidence and justification, why compliance with the relevant measure was not practicable in the specific circumstances encountered. <u>Post discharge / during construction</u> The Applicant also recognises that the question may arise in circumstances where a Requirement has already been discharged and the Applicant is

Hearing Action Point	Interested Party	Response	Applicant Comment
			implementing the authorised development (including where a measure is expressed in permissive terms such as “where practicable”). If the enforcing authority considers that the Applicant has failed to comply with the DCO (including misapplying the concept of “practicable”), it may follow the procedures under Part 8 (enforcement) of the Planning Act 2008, which include requiring further information. In that scenario, whether a measure was “practicable” would be determined through the enforcement process, where the Applicant must justify its approach with evidence.
	Essex County Council [REP4-328]	ECC has undertaken a comprehensive review of the draft DCO and the use of the term ‘where practicable’.	The Applicant notes a further question on this matter was issued by the ExA under ExQ2 DCO 2.G2, which the Applicant has responded to in **8.9.2 Applicant's Responses to Second Written Questions.** The Applicant has however identified specific aspects of the ECC Appendix C that can be clarified and responded to as below.
		7.3 Outline Construction Traffic Management Plan (Items 6-16)	• (5.4.7) The Applicant notes the response from Essex County Council on this matter. The Applicant has stated the various obstruction categories considered in Paragraph 5.4.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]** and therefore considers no further change required. • (5.4.21 and 5.6.4) In Paragraph 5.4.22 of **7.3 Outline Construction Traffic Management Plan [Revision D]**, the Applicant states how contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. Given the reactive (and sometimes emergency) nature of utilising contingency routes, the Applicant considers the wording in **7.3 Outline Construction Traffic Management Plan [Revision D]** is appropriate. The Applicant sets out the construction routeing strategy in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]** and considers this robustly communicates the proposed access arrangements. • (5.5.1) The Applicant has updated Paragraph 5.8.3 of **7.3 Outline Construction Traffic Management Plan [Revision D]** to expand on this point, detailing that alternatives for cyclist and pedestrian access will be considered in circumstances where safe operation of the works or the safe use by active travel users is compromised. • (5.8.5 and 5.8.6) Detail on the Permit Schemes are included within Section 2.4 7.3 **Outline Construction Traffic Management Plan [Revision D].** The Applicant has updated Section 5.8.7 of **7.3 Outline Construction Traffic Management Plan [Revision D]** to remove the “reasonably practicable” • (5.8.8) As noted in Paragraph 5.8.10 of **7.3 Outline Construction Traffic Management Plan [Revision D]**, the means of access will be communicated to the relevant highway authorities and emergency and essential services. • (5.10.2) In **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant confirmed that the Main Works Contractor(s) will communicate the AIL delivery requirements as soon as they are known. The Applicant is continuing to liaise with the police forces and will consider notice periods as part of this engagement.

Hearing Action Point	Interested Party	Response	Applicant Comment
			• (6.5.3) The Applicant notes this point. The Applicant will update **7.3 Outline Construction Traffic Management Plan** at a later deadline to state that in instances where community events cannot be avoided, the Applicant will notify the Community Liaison Officer immediately, with reasons, so that the local community can be informed.
		7.6 Outline Public Rights of Way Management Plan (paragraphs 15-17)	• (3.4.1, 4.2.1, 5.1.1) The Applicant notes Essex County Council's comments regarding the definition of "practicable" in relation to PRoW management arrangements. However, the Applicant does not agree that the term should be limited to considerations of safety and environmental protection only. The definition of "practicable" has been applied to reflect the range of factors that must be considered when managing PRoWs in the context of a linear construction project, including construction feasibility, landowner requirements, and the sequencing of and access to the works, in addition to safety and environmental protection. These factors materially influence both the extent and duration of impacts on PRoWs and are therefore necessary considerations in ensuring that impacts are minimised appropriately. The Applicant also notes that **7.6 Outline Public Rights of Way Management Plan [Revision C]** and **3.1 Draft Development Consent Order [Revision E]** (Draft DCO) already include appropriate controls and safeguards. In particular, the final PRoW Management Plan is required to be submitted to, and approved by, the relevant Local Highway Authority under Schedule 3, Requirement 4 of **3.1 Draft DCO [Revision E]**, providing the Local Highway Authority with oversight of the detailed management measures, including where managed access or closures are proposed. The Applicant further confirms that, as set out in Section 6 of **7.6 Outline Public Rights of Way Management Plan [Revision C]**, any changes to the approved PRoW management measures, including the duration of closures or the management regime, would be subject to the change control process secured through **3.1 Draft DCO [Revision E]**. This includes submission of the proposed changes to the relevant planning authority for approval. • (5.1.3) The Applicant notes Essex County Council's comments regarding the inclusion of a defined backstop period for reinstatement. However, the Applicant does not consider that this is necessary. The indicative durations set out in **7.6 Outline Public Rights of Way Management Plan [Revision C]** already represent the full period during which a PRoW may be subject to temporary management measures, including the time required for reinstatement. These durations will be further refined and confirmed within the final PRoW Management Plan, which will include reinstatement activities and will be submitted to, and approved by, the relevant Local Highway Authority under Schedule 3, Requirement 4 of **3.1 Draft DCO [Revision E]**. The wording "as soon as practicable" is therefore intended to ensure that reinstatement is carried out within the agreed duration for the activity, or sooner where circumstances allow, taking account of safety, construction feasibility, environmental protection, landowner requirements, or the sequencing of, and access to, the works.

Hearing Action Point	Interested Party	Response	Applicant Comment
			• (5.2.26) The Applicant notes Essex County Council's comments regarding the duration of temporary PRoW closures. See responses to 3.4.1, 4.2.1, 5.1.1 and 5.1.3 above.
		7.2 Outline Code of Construction Practice (paragraphs 18-31)	The Applicant acknowledges the feedback from the Council and a number of uses of the term 'where practicable' were removed at Deadline 4. However, the Applicant's position remains that the remaining use of 'where practicable' within the outline control documents is necessary in each instance of its use. The is set out in: • the Applicant's response to SET 1.5 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] • the Applicant's response to IP's responses to SET 1.5 on page 334 of 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299] • 7.2 Outline Code of Construction Practice [REP4-164] (which supersedes previous versions), • 7.4 Outline Landscape and Ecological Management Plan [Revision E] (which supersedes previous versions), • 7.5 Outline Archaeological Mitigation Strategy and Outline WSI [Revision B] (which supersedes previous versions) A further response on this matter is provided in response to ExQ2 in 8.9.2 Applicant's Responses to Second Written Questions, question DCO 2.G1.
		7.4 Outline Landscape and Ecological Management Plan (paragraph 32-22)	
		7.5 Outline Archaeological Mitigation Strategy and Outline WSI (paragraph 34-35)	

3.4 ISH2 Action Point 10

Table 3.3 Applicant's Comments on IP Responses to ISH2 Action Point 10

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 10 *Discharge period* • Provide a full response in writing to the local authorities' request to further extend the period for discharge to 40 working days/ 56 calendar days. • Local authorities to provide additional justification for their request, including reasons for continuing to request additional days for discharge (with reference to experiences relating to	**Braintree District Council [REP4-323], Brentwood Borough Council [REP4-324], Chelmsford City Council [REP4-326], Colchester City Council [REP4-327], Essex County Council [REP4-328] and Thurrock Council [REP4-338]**	*Requesting Additional Days for Discharge* The Council has previously set out its detailed justification for an extended determination period within its response to **ExQ1 DCO 1.A2 [REP3-091]**, including a breakdown of the stages involved in discharging Requirements and the practical constraints encountered. To avoid repetition, those points are summarised and supplemented below in light of matters raised at the hearing. The Council's position is informed by direct experience of discharging Requirements under the Bramford to Twinstead DCO. That Order provides for a 35-day determination period, supported by a Planning Performance Agreement, including provision for pre-application engagement. Notwithstanding these measures, the Council has found that this timeframe is consistently challenging to achieve in practice. The Council maintains that a minimum 56-day determination period (or 40 business days), with flexibility to extend where necessary, remains appropriate and justified.	The Applicant refers to its response to ExQ1 DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and notes that this position has been further developed in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The Applicant updated timings in **3.1 Draft Development Consent Order [REP3-004]** that was submitted at Deadline 3 from 28 days to 25 business days. In response to Suffolk County Council's comment regarding the Sea Link Examining Authority's recommendation, the Applicant 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 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. The Applicant does not propose to further amend the timescales. The Applicant acknowledges the concerns raised **Suffolk County Council [REP4-336]** regarding cross-referencing between discharge submissions and the practical challenges this can present.
	Chelmsford City Council [REP4-326]	*[In addition to the above, CCC also states:]* CCC's position is informed by direct experience of discharging Requirements under the Longfield Solar Farm DCO and parts of the	

Hearing Action Point	Interested Party	Response	Applicant Comment
Sea Link and Bramford to Twinstead).		A12 Chelmsford – Colchester Widening DCO. CCC has also had regard to the experience of other Host Authorities regarding the Bramford to Twinstead and Sea Link DCO's. The Longfield Solar Farm DCO provides a 10-week determination period. Whilst many decisions have been issued in time, others have had to be extended due to the need to obtain the technically complex further information necessary to enable the requirement to be acceptably discharged. From experience, delays occur when there is a need to obtain advice from external stakeholders, where the processes of consultation, Applicants response to consultation, and re-consultation have led to delays in the discharge process.	The Applicant recognises that in some instances, supporting documents may cross-refer to other plans or documents that are submitted separately. To address this, the Applicant is content that where a document submitted for approval cross-refers to another plan that is necessary to understand or assess that submission, that plan can be provided alongside the application for discharge. The Applicant considers that this is appropriately addressed through the Planning Performance Agreement and agreed ways of working for the discharge of Requirements, which are already being developed with the relevant authorities, rather than through amendments to the DCO itself.
	Norfolk County Council [REP4-332]	Norfolk County Council note that the model provisions set out in PINS Advice note Fifteen: drafting Development Consent Orders provide for a discharge period of 42 days (equivalent to 30 business days or 6 weeks, in contrast to 25 business days or 5 weeks provided for in revision C of the draft DCO). NCC is clear that 8 weeks is the standard period for discharge of requirements for energy NSIPs and that this does not represent further delay.	
	Suffolk County Council [REP4-336]	SCC recognises that on Sea Link, the ExA recommended that the dDCO be amended from 35 to 56 calendars. The Council considers that the same applies to this project, although the Council proposes 40 business days to reflect drafting by the Applicant in relation to this dDCO. For the discharge of requirements for The Bramford to Twinstead Order, SCC has experienced significant challenges in meeting the 35 calendar days discharge timeframe (and the 7 calendar days for requesting Further Information). The following outlines the critical issues that have frequently delayed the discharge of requirements and placed undue pressure on the Council for the Bramford to Twinstead project. Regularly, the submitted documents for discharge reference or cross-reference to other plans that have yet to be submitted or shared with the discharging authority. Despite requests to review plans in parallel, this has not been adopted. The Council considers that an extended timeframe (of 40 business days) for the discharge of requirements would enable officers to further scrutinise discharge documents and to compare these with the information previously in submitted discharge documents (where referenced).	
	Tendring District Council [REP4-337]	TDC maintains its position, that a longer determination period is necessary. Drawing on ECC colleagues experience of the Bramford to Twinstead DCO, the current 35-day timeframe has proven consistently challenging, even with pre-application engagement in place. TDC also notes that longer determination periods are established in other DCOs, such as Hinkley Point C, demonstrating that extended timescales are reasonable. Accordingly, TDC considers a minimum 56-day (40 working days) determination period to be necessary and justified.	

Hearing Action Point	Interested Party	Response	Applicant Comment
	Braintree District Council [REP4-323]	*[In addition to the above, Braintree Council also states:]* Notwithstanding the above, it should be noted that the Council have no objection to the use of business days and have previously advocated for this.	The Applicant notes the Council's comment.
	Essex County Council [REP4-328]	*[In addition to the above, ECC also states:]* It would respectfully point to the Longfield Solar Farm DCO which has a 10 week determination period. […] ECC will not unreasonably delay the determination of an application for the discharge of requirements. Assuming there is robust pre application engagement and enshrined controls over validation within the DCO, it would expect to determine application at the earliest opportunity. An extension of the period for the determination of applications to 40 business days does not automatically mean the determination process will take that long unless justified by the complexity of the matter under consideration.	The Applicant notes the determination period on the Longfield Solar Farm DCO. However, the Applicant maintains its position on its proposed determination period, as set out in its response above. It should be noted that Longfield Solar Farm's DCO application (28 February 2022) and determination (26 June 2023) occurred prior to the publication of the revised National Policy Statements for Energy and the introduction of Critical National Priority (CNP) policy for low-carbon energy infrastructure (24 April 2025). It also occurred prior to the publication of Clean Power 2030 (5 November 2024). These publications, which are relevant to the Project, clearly established an urgent need for delivery of such infrastructure and provide a different context to that at the time of Longfield Solar being consented. The Applicant notes the Council's comment and reiterates its commitment to continued proactive pre-application engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post-consent submissions.
ISH2 Action Point 10 • Provide a response to the suggestion of a validation checklist being secured in the DCO.	**Braintree District Council [REP4-323]**, **Brentwood Borough Council [REP4-324]**, **Colchester City Council [REP4-327]**, **Essex County Council [REP4-328]**, **Thurrock Council [REP4-338]**, **Suffolk County Council [REP4-336]** and **Tendring District Council [REP4-337]**	*Validation Checklist in DCO* The Councils supports the inclusion of a validation checklist within the DCO.	The Applicant refers to its response to Action Point 10(b) in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** in which it confirms that it agrees a validation checklist (or similar) could be helpful, and that it would be most appropriate for the drafting to be proposed by the host authorities for consideration by the Applicant.
	Chelmsford City Council [REP4-326]	CCC supports the inclusion of a validation checklist within the DCO. Yet it is cautioned that, whilst this may improve efficiency in the determination process and reduce the need for subsequent information requests, it will be dependent upon the quality and technical complexity of the information submitted. Ideally, all requirements should be considered and consulted on at pre-application stage first.	The Applicant notes the Council's comment and reiterates its commitment to continued proactive pre-application engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post-consent submissions.

3.5 ISH2 Action Point 11

Table 3.4 Applicant's Comments on IP Responses to ISH2 Action Point 11

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 11 *ExQ1 DCO 1.A6 and 'maintain' Local authorities to comment on the Applicant's position in its response to the question.*	**Braintree District Council [REP4-323], Brentwood Borough Council [REP4-324]**, **Colchester City Council [REP4-327]** and **Thurrock Council [REP4-338]**, **Chelmsford City Council [REP4-326]**, **Essex County Council [REP4-328]**, **Tendring District Council [REP4-337]**	The Councils all raise comments that the definition of "maintain" encompasses a wide range of activities in relation to the authorised development. The Council's consider that the inclusion of the additional wording to seek the opinion of the relevant planning authority is necessary to ensure appropriate oversight in determining whether maintenance activities could give rise to materially new or materially different environmental effects. The introduction of the Local Planning Authority safeguard is considered to present the best possible means of assessing these impacts.	Please refer to the Applicant's response to DCO 2.A2 in **8.9.2 Applicant's Response to Second Written Questions (Revision A)** in which it responds to these points.

3.6 ISH2 Action Point 16

Table 3.5 Applicant's Comments on IP Responses to ISH2 Action Point 16

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 16 *Schedule 3 - Requirements 1 (Interpretations) Local authorities to comment on the Applicants response to ExQ1 DCO 1.S5 regarding the discharging authority and the revised wording, including in relation to local government reform as set out in the Devolution and Community Empowerment Bill 2025. Both the Applicant and local authorities to provide further comments on the definition of 'stage'.*	**Braintree District Council [REP4-323]**	The Council defers to ECC's detailed response and supports its overall position that, while the Applicant's revised wording is a positive step and broadly workable in principle, it does not yet fully address the implications of local government reorganisation.	Please refer to the response provided to Essex County Council below.
	Brentwood Borough Council [REP4-324]	BBC acknowledges that in light of previous host authority responses, the Applicant has reframed the definition of 'relevant planning authority'. However, the substantial majority of post-consent discharge activity on the Project will occur after April 2028, by which point the two-tier structure across Essex will have ceased to exist. BBC considers that the Applicant's reframing does not fully capture that transition.	
	Chelmsford City Council [REP4-326]	CCC has no objections to the revised wording relating to Local Government reform. Similar wording exists within other DCO's such as Longfield, which enable continuity planning. CCC considers that the term stage should be clearly defined. It currently lacks ambiguity and appears that it could be used by the Applicant according to where they see fit. Whilst CCC is empathetic to the scale of the project, CCC disagrees with the Applicant's assertion that it is not appropriate or proportionate for the Applicant to seek each authority's consent to the written scheme setting out the stages of the authorised development. It is suggested that an outline scheme of the stages of the development is submitted at requirement level, with further detail to follow.	The Applicant notes the Council's comments on the definition of relevant planning authority in the context of Local Government reform. For the definition of 'stage', the Applicant refers to its response to ExQ1 DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and notes that this point has been further developed in its response to Action Point 16 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**.

Hearing Action Point	Interested Party	Response	Applicant Comment
	Essex County Council [REP4-328] Colchester City Council [REP4-327]	The Applicant's new two-limb definition will work during the present period of two-tier areas: in two-tier areas the 12 district takes the primary discharging role; in unitary areas (or in any single-authority scenario) the sole LPA does. But the substantial majority of post-consent discharge activity on this Project will occur after April 2028, by which point the two-tier structure across Essex, Southend and Thurrock will have ceased to exist. The Applicant's response at DCO 1.S5 is silent on that transition. The Applicant's response does helpfully note that limb (b) is intended to capture “single-authority scenarios” without requiring an exhaustive schedule, and that this avoids the problem with Norfolk County Council's proposed “relevant district planning authority” definition. That is correct as far as it goes. The point ECC wishes to add is that limb (b) needs to operate cleanly on transition, so that, on 1 April 2028, the successor unitary authorities fall within limb (b) as the single local planning authority for their respective areas, by operation of the “successor in function” wording the Applicant has already begun to include. In REP3-078, ECC provided its views in response to GEN 1.5 and DCO 1.S5, identifying that a general addition of “any successor or successors in function” would give the requisite clarity, because that would address situations where the functions were split across more than one successor. Revision C has already inserted “any successor exercising its functions as local planning authority” within the definition of "relevant planning authority". That is welcome. However, the wording should refer to “any successor or successors in function”. Where a predecessor authority's area falls across the boundary of more than one new unitary, which could be the case across Essex in particular, given that the existing districts and boroughs in the Order Limits will be reorganised into five new unitary authorities there may be 13 more than one successor authority for what is currently a single ECC or district function. A “successor in function” reference in the singular leaves that ambiguous on the face of the Order. Article 2(8) (which provides that references in the Order to any statutory body include that body's successor in respect of functions relevant to the Order) should be amended in two ways: to include the plural (“successor or successors”), and to add a tie-breaker for the situation in which a function is split across more than one successor authority. The following wording is suggested: *"References in this Order to any statutory body include that body's successor or successors in respect of functions which are relevant to this Order and, where there is more than one such successor, the successor authority for the area to which the relevant provision relates."*	Where local government reorganisation results in more than one successor authority across a current given area – as may well occur across Essex – the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of ‘relevant planning authority’ is already optimally structured from a statutory drafting perspective to address the scenario Essex describes. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for ‘the area to which the provision relates’ in each case. The proposed addition of ‘or successors’ (plural) is unnecessary. The reference to a single ‘successor’ in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary. There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the drafting guidance2 for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it. Where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.

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

Hearing Action Point	Interested Party	Response	Applicant Comment
		That reflects how Structural Changes Orders typically allocate functions on reorganisation and avoids the risk of the Order being read as requiring all successors jointly to discharge a function that, after reorganisation, will sit with one of them by reference to area.	
	Norfolk County Council [REP4-332]	NCC finds the Applicant's revised wording acceptable. NCC accepts that the Applicant's wording will deal with any of these scenarios, while our proposed solution (see Table 4-A of **[REP1-173]**) would only have dealt with the most likely scenario of the creation of district councils with the functions of a county council.	The Applicant notes the Council's comments.
	South Norfolk District Council [REP4-334]	SNDC raise that presently, under the other DCO's in Norfolk, SNDC as the local planning authority have been required to consult with the Historic Environment Service who fall under Norfolk County Council for archaeological responsibilities, not Historic England. SNDC also query the terminology 'relevant county planning authority' and would suggest that the three county's' archaeological services are listed in the Terms of Reference as this in relation to archaeology.	Historic England requested to be a consultee, where relevant, which the Applicant anticipates would be in connection with assets of particular importance or areas of scientific complexity. This would not preclude consultation with those with the relevant expertise within the district or county authorities. Rather than specify each of the archaeological services, the applicant has updated **3.1 Draft Development Consent Order [Revision E]** to refer to consultation with "the relevant county planning authority's archaeological or historic environment service".
	Tendring District Council [REP4-337]	TDC has reviewed the Applicant's updated position but remains concerned that the definition of "stage" lacks sufficient clarity and precision. As currently drafted, there is a risk that the definition could allow large or not clearly defined parts of the authorised development to be treated as a single "stage". This would reduce the effectiveness of the Requirements regime by enabling substantial elements of the project to come forward for approval in one submission, rather than in logical and manageable phases. TDC therefore considers that the definition of "stage" should be refined or supported by clearer parameters, potentially through the inclusion of indicative staging principles or a requirement for approval of a staging plan by the relevant planning authority.	The Applicant refers to its response to ExQ1 DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and notes that this point has been further developed in its response to Action Point 16 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**.
	Thurrock Council [REP4-338]	Thurrock Council is satisfied with the Applicant's proposed definitions of 'relevant planning authority' and 'relevant county planning authority'. The Council is of the view that it removes any ambiguity from previous terminology and limb (b) of the former term adequately recognises the functions unitary authorities, like Thurrock Council, exercise as single-tier authorities undertaking both county and district planning functions. Revision C has already inserted "any successor exercising its functions as local planning authority" within the definition of "relevant planning authority". That is welcome. However, the wording should refer to "any successor or successors in function". Where a predecessor authority's area falls across the boundary of more than one new unitary, which could be the case across Essex in particular, given that the existing districts and boroughs in the Order Limits will be reorganised into five new unitary authorities there may be more than one successor authority for what is currently a single ECC or district function. A "successor in function" reference in the singular leaves that ambiguous on the face of the Order.	The Applicant notes the Council's comments on the definition of discharging authorities and refers to the response provided to Essex County Council above. For the definition of 'stage', the Applicant refers to its response to ExQ1 DCO 1.A10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and notes that this point has been further developed in its response to Action Point 16 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**.

Hearing Action Point	Interested Party	Response	Applicant Comment
		Article 2(8) (which provides that references in the Order to any statutory body include that body's successor in respect of functions relevant to the Order) should be amended in two ways: to include the plural (“successor or successors”), and to add a tie-breaker for the situation in which a function is split across more than one successor authority. The following wording is suggested: "References in this Order to any statutory body include that body's successor or successors in respect of functions which are relevant to this Order and, where there is more than one such successor, the successor authority for the area to which the relevant provision relates." That reflects how Structural Changes Orders typically allocate functions on reorganisation and avoids the risk of the Order being read as requiring all successors jointly to discharge a function that, after reorganisation, will sit with one of them by reference to area.	

3.7 ISH2 Action Point 17

Table 3.6 Applicant's Comments on IP Responses to ISH2 Action Point 17

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 17 *Schedule 3 – Requirement 5 (Archaeology) Local authorities to provide comments on the applicant’s answer to ExQ1 DCO 1.S8 and the document now provided **[AS-090]**.*	**Braintree District Council [REP4-323]**	The Council offer a summary of the position, which is that the current drafting of Requirement 5 is insufficient to ensure effective archaeological control, as it relies on outline documents (the OAMS-OWSI) which remain unagreed and are not yet adequate to function as control documents. In the absence of an agreed and robust strategy, the archaeological advisor considers that intrusive pre-commencement works should not proceed until detailed, site-specific Written Schemes of Investigation have been approved, reflecting a precautionary approach to safeguarding archaeological assets. This position is informed by experience on the Bramford to Twinstead project, where failure to secure agreement pre-consent resulted in delays, and it is therefore not appropriate to assume timely agreement in this case. Notwithstanding these concerns, the archaeological advisor is content with the Applicant’s proposed approach to post-excavation assessment, analysis and publication, provided it is appropriately secured within the DCO.	The Applicant notes the concern regarding the timing of approval of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (OAMS-OWSI) [Revision B]**. The Applicant considers that Requirement 5, together with the OAMS-OWSI, provides an appropriate and established mechanism to secure archaeological control, including the approval of detailed WSIs prior to the commencement of relevant intrusive works. This approach is consistent with standard practice for Nationally Significant Infrastructure Projects. As set out in **8.4.10 Applicant’s Comments on Responses to ExQ1 [REP4-299]**, page 190, the updated **7.5 OAMS-OWSI [Revision B]** has been progressed with stakeholder input and further consultation ahead of the Deadline 5 submission, following earlier circulation to relevant stakeholders prior to Deadline 4. This iterative process ensures that a robust, auditable and deliverable mitigation framework is secured within the DCO, with sufficient opportunity for agreement to be reached during Examination.
	Essex County Council [REP4-328], **Chelmsford City Council [REP4-326]**, **Colchester City Council [REP4-327] and Thurrock Council [REP4-338]**	ECC would refer to Section 2 of this letter regarding ECC’s comments on the additional submission accepted by the ExA from the Applicant regarding Archaeology - in **8.9.1 Applicant's Responses to First Written Questions**. In so doing, Place Services (Archaeology) on behalf of ECC has commented on the current drafting Requirement 5 and recommended alternate wording for consideration and discussion with the Applicant.	The Applicant has provided a response to Section 2 of REP4-328 in **8.4.13 Applicant’s Response to Comments on its ExQ1 Responses [Revision A]** (submitted at Deadline 5) with reference to written question DCO 1.S8.
	Norfolk County Council [**REP4-332**]	NCC agrees generally with the proposed changes to requirement 5 contained in **[AS-090]**. However, the applicant has still not provided	Historic England requested to be a consultee where relevant, which the Applicant anticipates would be relevant in connection with assets of particular

Hearing Action Point	Interested Party	Response	Applicant Comment
		any information about which discharges of requirement Historic England will be 'relevant'.	importance or areas of scientific complexity. This would not preclude consultation with those with the relevant expertise within the district or county authorities. Requirement 5 (archaeology) was updated at Deadline 3 to replace reference to Historic England as a discharging authority with reference to them being a consultee.

3.8 ISH2 Action Point 20

Table 3.7 Applicant's Comments on IP Responses to ISH2 Action Point 20

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 20 *Article 60 and Schedule 19 Local authorities to respond to the points made at the hearing.*	**Braintree District Council [REP4-323]** **Essex County Council [REP4-328]** **Thurrock Council [REP4-338]**	In relation to the absence of a standalone CEMP, the Council's concern centred on whether adequate controls would be secured in respect of construction-phase environmental effects. The Applicant has set out that the oCoCP, together with its appendices, incorporates the measures typically contained within a CEMP, thereby negating the need for a separate document. The Council has sought and received clarification on a number of technical matters within the oCoCP, in order to verify that it secures the mitigation measures and controls ordinarily expected to be delivered through a CEMP, and that it is sufficiently robust and fit for purpose. On the basis of this further review, the Council's technical specialists in Air Quality, Geology and Hydrogeology, and Noise and Vibration are satisfied that the oCoCP adequately addresses the necessary construction-phase controls within their respective disciplines. While some concerns remain in relation to other matters, including working hours, the Council is satisfied in principle that the oCoCP can operate as an appropriate substitute for a standalone CEMP. In relation to ecological matters, the Council's Ecological Advisor considers that the oCoCP broadly addresses the range of issues that British Standard BS 42020:2013 Biodiversity – Code of practice for planning and development advises should be encompassed within a CEMP. The Council also notes that there is a degree of overlap between the oCoCP and the outline Landscape and Ecological Management Plan (LEMP), the latter providing additional detail relevant to the construction phase. However, it is acknowledged that BS 42020:2013 anticipates a greater level of specificity than is currently presented within the outline oCoCP and LEMP. In any case, the Council recognises that both documents are, at this stage, outline in nature, and therefore certain detailed measures may not yet be capable of being fully specified.	The Applicant acknowledges that the Council has no further comments on the certification of documents in **3.1 Draft Development Consent Order [Revision E]**. The Applicant notes the Council's reviewed position on the adequacy of the management plans, noting that at this stage these are in outline form and the final versions of management plans will be produced substantially in accordance with the outline documents.
	Chelmsford City Council [REP4-326]	For the avoidance of doubt, and from CCC's experience of dealing with requirements on the Longfield Solar Farm, CCC recommends that all documents should be listed as Certified plans and documents.	The Applicant refers to its response to ExQ1 DCO 1.G3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and maintains its position that **7.2 Outline Code of Construction Practice [Revision E]** includes all

Hearing Action Point	Interested Party	Response	Applicant Comment
		This would enable them to be amended / replaced if required during the discharge of requirement procedure. CCC remains concerned regarding the absence of a standalone CEMP. For a project of this scale and size, CCC considers that a CEMP should be submitted as standard and queries why the Applicant is 'going against the grain' regarding the submission of a common practice planning document. There is a key differentiation between CEMP's and oCoCP, with the former having a typically higher emphasis on environmental matters, practices and controls. In reaching this view, it is noted that the Applicant has set out that the oCoCP, together with its appendices, incorporates the measures typically contained within a CEMP. Yet for the avoidance of doubt, and to enable ease and familiarity during at discharge of requirement, which the Applicant repeatedly insists is timebound, CCC's preference is for a CEMP to be provided, or at least form part of an appendices to the oCoCP.	information that would typically be found within a Construction Environmental Management Plan (CEMP) and therefore a separate control document is not required. The absence of a document from a list of certified documents does not prevent an amendment or replacement of that document should it be required during the discharge of requirements process. Furthermore, the inclusion of "unless otherwise agreed" wording in Schedule 3 to the **3.1 Draft Development Consent Order [Revision E]** provides scope for deviations from certain approved plans, documents or schemes where the relevant planning or highway authority is satisfied that doing so would not give rise to materially new or materially different environmental effects (paragraph 1(4)).
	Colchester City Council [REP4-327]	The Council notes that there is a degree of overlap between the oCoCP and the outline Landscape and Ecological Management Plan (LEMP), the latter providing additional detail relevant to the construction phase. However, it is acknowledged that BS 42020:2013 anticipates a greater level of specificity than is currently presented within the outline oCoCP and LEMP. In any case, the Council recognises that both documents are, at this stage, outline in nature, and therefore certain detailed measures may not yet be capable of being fully specified.	The Applicant acknowledges that the Council has no further comments and recognises these documents are currently outline in nature. The final Landscape and Ecological Management Plan must be substantially in accordance with **7.4 Outline Landscape an Ecological Management Plan [Revision E]**. Details of the planting within the Environmental Areas and reinstatement planting will 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.
	Tendring District Council [REP4-337]	TDC would like to defer comment on the adequacy of the oCoCP until wide ranging concerns around lack of adequate mitigation along Bentley Road (to name one example) as well as the bespoke noise mitigation strategy for Jasmine Cottage (and hopefully other affected properties along Bentley Road – see other relevant responses below) have been provided by the Applicant. Until such time it is premature for TDC to comment on the adequacy of the oCoCP as a 'framework' for construction-phase environmental control. Other concerns also remain (for example, in relation to working hours). In ecological terms, the Council's Ecological Advisor at ECC considers that the oCoCP broadly aligns with the scope of a CEMP as described in BS 42020:2013. However, both the oCoCP and outline LEMP remain high-level and lack some of the detail typically expected. The Council acknowledges this reflects their outline status at this stage.	The Applicant refers to its response to ExQ1 DCO 1.G3 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and maintains its position that **7.2 Outline Code of Construction Practice [Revision E]** includes all information that would typically be found within a Construction Environmental Management Plan (CEMP) and therefore a separate control document is not required.

3.9 ISH2 Action Point 22

Table 3.8 Applicant's Comments on IP Responses to ISH2 Action Point 22

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 22 *ExQ1 GEN 1.21 and Appendix E The local authorities, highway authorities, police forces and statutory undertakers named in the Appendix E of [REP3-074] are to provide further response to ExQ1 GEN 1.21 and Appendix E, having regard to the criteria set out in s122(2) of the Community Infrastructure Levy Regulations 2010. Rosie Pearson for Pylons East Anglia and Charles Micklem to provide in writing their comments regarding clauses in agreements relating to objections to planning applications and projects.*	**Braintree District Council [REP4-323]** and **Colchester City Council [REP4-327]**	The Council has been mentioned in Appendix E on Page 6 and Page 10, both in relation to skills and employment. Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 provides that a planning obligation (including a section 106 agreement) may only constitute a reason for granting development consent if it meets all of the relevant tests. The Council has had regard to the requirements of Regulation 122(2) in considering whether a Skills and Employment Plan, and any associated funding, could appropriately be secured through a planning obligation. The Council considers that, where appropriately framed, such measures are capable of meeting the statutory tests. In particular, having regard to the scale, duration and geographic extent of the construction phase, together with the cumulative effects arising from other similar projects in the area, the Proposed Development would give rise to identifiable socio economic effects within the District. These include disruption to existing businesses, agricultural operations and local labour markets. A Skills and Employment Plan, targeted at supporting local workforce participation and responding to construction-related labour demands, would therefore be necessary to make the development acceptable in planning terms, directly related to the development, and proportionate in scale and kind, subject to it being appropriately scoped and evidenced. The Council does not agree with the Applicant's position that such measures fall solely within the scope of wider "community benefits". Rather, where they are directed at addressing the socio-economic effects arising from the construction and delivery of the Proposed Development, they constitute legitimate mitigation which may be secured either through a Requirement within the DCO or, where appropriate, a separate legal agreement.	The Applicant has submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to the host authorities for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. **6.15 ES Chapter 15 Socio-Economics, Recreation and Tourism [APP-265)]** does not identify any relevant significant adverse effects of the Project arising from its construction, operation or decommissioning on socio-economic, recreation and tourism receptors. As such, Employment and Skills Plan is not required as mitigation, but is intended to maximise socio-economic benefits arising from the Project. On this basis, the use of a DCO requirement is considered appropriate and proportionate, and a separate legal agreement is not considered necessary.
	Chelmsford City Council [REP4-326]	*[CCC are mentioned a number of times in Appendix E and comment as follows:]* Applicant's vision is that tree planting would be likely be captured under a S106 Unilateral Undertaking to secure the necessary finance to deliver the agreed planting. CCC's view is the project would lead to the loss of a significant number of trees. Their replacement and replanting is considered necessary to make the development acceptable (although their removal does not override the Councils objection to the proposal, directly related to the development, which would remove trees affected by the proposal and at a standard 3:1 replacement in principle, would be fairly and reasonably related in scale and in kind. Following the application of the mitigation hierarchy, the replacement of these trees at the ratio provided is considered to	Chelmsford City Council's comments are noted.

Hearing Action Point	Interested Party	Response	Applicant Comment
		meet all of the tests set out in set out in s122(2) of the Community Infrastructure Levy Regulations 2010.	
	Chelmsford City Council [REP4-326] and **Essex County Council [REP4-328]**	*[CCC/ECC are mentioned a number of times in Appendix E and comment as follows:]* CCC is currently in discussion with the Applicant regarding the scope of planting but envisages this would likely be captured under a S106 Unilateral Undertaking to secure the necessary finance to deliver the agreed planting. CCC's view is the project will leave a significant landscape and visual impact on the landscape of Chelmsford*[/Essex]* and its environs and as such, following the application of the mitigation hierarchy, reasonable compensatory planting should be delivered as part of the Project prior to the application of the projects CNP to the overall planning balance to determine the recommendation. CCC considers the issue of landscape compensation would fulfil, the tests set out in set out in s122(2) of the Community Infrastructure Levy Regulations 2010.	The Applicant's position in relation to the requirement for landscape compensation remains unchanged with the latest position set out in response to Item 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities in the specific locations identified in ExQ1 LV1.28 as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
	Chelmsford City Council [REP4-326] and **Essex County Council [REP4-328]**	*[CCC are mentioned a number of times in Appendix E and comment as follows:]* CCC's position on the need for an Employment, Skills, Education and Supply Chain Strategy is outlined in its LIR and response to ExQ1. CCC is currently in discussion with the Applicant regarding the scope, content and delivery of an Employment and Skills Plan. CCC considers that there is an impact on local business as a result of Norwich to Tilbury being implemented and that there is a need for this impact to be mitigated. CCC is of the opinion such an obligation would fulfil the tests set out in s122(2) of the Community Infrastructure Levy Regulations 2010.	The Applicant has submitted **8.13 Outline Employment and Skills Plan [Revision A]** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document wascirculated to the host authorities for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. **6.15 ES Chapter 15 Socio-Economics, Recreation and Tourism [APP-265)]** does not identify any relevant significant adverse effects of the Project arising from its construction, operation or decommissioning on socio-economic, recreation and tourism receptors. As such, the Employment and Skills Plan is not required as mitigation, but is intended to maximise socio-economic benefits arising from the Project. On this basis, the use of a DCO requirement is considered appropriate and proportionate, and a separate legal agreement is not considered necessary.
	Chelmsford City Council [REP4-326]	*[CCC are mentioned a number of times in Appendix E and comment as follows:]* The proposal is considered to lead to substantial harm to heritage features and compensation should be provided to protect existing them and, providing opportunities to repair and restore features to ensure their longevity and conservation. This would be in accordance Policy DM13, where they would provide public benefit. Combined with landscape, there is potential to integrate these features, through additional planting restoration and landscaping at sensitive heritage hotspots such as The Walthams. CCC considers that compensation is considered is considered necessary to make the development acceptable (although it does not override the Councils objection to the proposal), directly related to the development, which has demonstrated that there would be harm to heritage features and assets by virtue of effects to their setting. Applicant has refused to	The Applicant's position in relation to the requirement for landscape compensation is set out in response to Item 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and its position on heritage compensation is set out on pages 24 to 25 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has nevertheless provided details of potential planting opportunities at The Walthams in as directed by the Examining Authority **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [Revision A].** These plans represent no commitment at this stage on the part of National Grid or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework

Hearing Action Point	Interested Party	Response	Applicant Comment
		offer any form of compensation, including additional planting and screening nor the undertaking of a bespoke assessment of compensation for assets such as Grade One Listed Langleys House and Garden. CCC compensation including that would safeguard the health and future longevity of such features could be fairly and reasonably related in scale and in kind given the number of heritage assets affected and the wider cumulative impacts upon them.	and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
	Chelmsford City Council [REP4-326]	*[CCC are mentioned a number of times in Appendix E and comment as follows:]* CCC will take legal advice regarding the use of Unilateral Undertakings to deliver these benefits and will report back to the ExA at deadline 5.	The Applicant will respond to these comments at Deadline 6 as appropriate.
	Essex County Council [REP4-328]	Framework Highway Agreement - to manage the design approvals ECC's position on the need for a Framework Highways Agreement is set out at 5.1.8-5.1.9 of its **LIR [REP1-161]**. ECC;'s strong preference is for the Applicant to enter into a S278 in respect for a Framework Highway Agreement. The relevant authorities are combining their responses on a draft Framework Highways Agreement and on Protected Provisions. Comments on the Protected Provisions are given in the event that the Framework Highways Agreement is not confirmed before the end of the Examination ECC is of the opinion an obligation to secure a Framework Highways Agreement would fulfil the tests set out in s122(2) of the Community Infrastructure Levy Regulations 2010	The latest position is set out on page 12 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**: '*It is the Applicant's understanding that the highway authorities are seeking a joint highways framework agreement (a section 278 agreement under the Highways Act 1980) in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination.*'
	Essex County Council [REP4-328]	ECC welcomes the Applicant's confirmation of its commitment to joining and engaging in the Developer's Forum to help facilitate coordination between developments. Given the potential impact of the project, a Developers Forum is considered a necessary form of mitigation and a commitment to engagement should form part of the DCO. It is ECC's view this should be captured through s106 unilateral undertaking as this would provide greater surety on delivery. The alternative via PPA is an option but is not as definitive as through a s106 Agreement.	The Applicant considers that the appropriate mechanism to recover costs in relation to the ECC Developer Forum is through a Planning Performance Agreement (PPA). This is the same mechanism that has been successfully utilised for cost recovery for the Council's resources during pre-application and examination of the Project, and will be utilised for the post-consent phase.
	Essex County Council [REP4-328]	To support implementation of the project, ECC considers appropriate funding will need to be available to cover the time that ECC officers will need to spend in providing oversight of the various mitigation and commitments that have been included in the DCO documentation, as well as the points raised in ECC's Local Impact Report. ECC would welcome further discussion with the Applicant on how this can be achieved so that any costs involved in supporting the implementation of the Project are cost neutral to ECC.	The Applicant has begun discussion with host authorities in relation to the potential use of PPAs to support resourcing officer time post-consent. Any arrangements would be progressed separately.
	Essex County Council [REP4-328]	ECC acknowledges that having regard to the criteria set out in s122(2) of the Community Infrastructure Levy Regulations 2010 although highly desirable, funding for PRoW, in this instance would not meet the tests. ECC will continue to discuss with the Applicant how this could still be realised.	The Applicant notes Essex County Council's comments.

Hearing Action Point	Interested Party	Response	Applicant Comment
	Norfolk County Council [REP4-332]	At the request of the Applicant, NCC and SCC are working on a note justifying our request for landscape compensation by reference to regulation 122 of the Community Infrastructure Levy Regulations 2010. This note is intended to be for the purposes of discussion with the Applicant, who we understand intends to provide further detail to the ExA at deadline 5.	The Applicant notes Norfolk County Council's comments and welcomes continued engagement on this matter.
	South Norfolk District Council [REP4-334]	The Applicants' response in Appendix E does not specifically refer to any of the other energy infrastructure proposals and consented schemes in the South Norfolk District which is what this suggestion was more aimed at, focussing on locally cumulative schemes.	The Applicant acknowledges the focus of the original response on consented schemes within Essex rather than Norfolk or South Norfolk. The Applicant's commitment to liaise with other Local Highway Authorities, National Highways and other developments to ensure a coordinated approach to construction traffic management is set out in Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]** and is Project wide. This includes other energy infrastructure Projects which overlap with the construction of the Project and share the same roads used by construction vehicles. For example, the Applicant would engage with the Equinor Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects as construction traffic flows have been considered within the ccumulative assessment within **6.16.A3 Environmental Statement Appendix 16.3 - Future Baseline [APP-274**] for PAR 1 - A140 Ipswich Road and PAR 2 - Mangreen Lane. Whilst at present there is a specific commitment to also join and engage with a Developer's Forum to be set up by ECC, the Applicant has also stated in paragraph 6.6.2 that it will engage with other Forums set up and managed by other Local Highway Authorities where appropriate.
	Tendring District Council [REP4-337]	TDC considers that a Skills and Employment Plan, including any associated funding, is capable of meeting the Regulation 122(2) tests where appropriately defined and targeted. Given the scale, duration and geographic reach of the construction phase, alongside cumulative pressures from other strategic infrastructure projects, the Development will give rise to socio-economic effects within the District.	The Applicant has submitted **8.13 Outline Employment and Skills Plan** at Deadline 5. Following a meeting with host authorities to set out its scope, a draft of this document was circulated to the host authorities for comment, and comments were considered ahead of submission. The commitment to the preparation and submission of a Final Employment and Skills Plan, and to carrying out the Project in accordance with the Plan, is secured through a requirement within **3.1 Draft Development Consent Order [Revision E]**. **6.15 ES Chapter 15 Socio-Economics, Recreation and Tourism (Document Reference 6.15 [APP-265)]** does not identify any relevant significant adverse effects of the Project arising from its construction, operation or decommissioning on socio-economic, recreation and tourism receptors. As such, the Employment and Skills Plan is not required as mitigation, but is intended to maximise socio-economic benefits arising from the Project. On this basis, the use of a DCO requirement is considered appropriate and proportionate, and a separate legal agreement is not considered necessary.
	Tendring District Council [REP4-337]	Page 12 – Road Condition Surveys Bentley Road and the local highway network serving PAR30 will accommodate the highest level of construction traffic across the entire project. As previously and repeatedly set out in relevant TDC evidence, existing road conditions are already poor, and the Applicant's own modelling indicates a substantial (circa 3000%) increase in all (cumulative) vehicular movements, including heavy goods vehicles along PAR30.	Section 5.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]** sets out the Applicant's approach to undertaking pre- and post-construction surveys. Pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. The scope of these surveys (in terms of the routes covered and the methodology of these surveys) is to be agreed with each LHA, prior to the start of the pre-commencement works. The results of these pre-condition surveys will be shared with the LHA prior to works commencing, including pre-commencement works relating to the highway.

Hearing Action Point	Interested Party	Response	Applicant Comment
		There is therefore a very high likelihood of material road deterioration arising from the Proposed Development. While TDC acknowledges that Section 59 of the Highways Act 1980 provides a potential mechanism to recover costs, it is: • Evidentially onerous, requiring proof (most of that burden will likely fall on the local highway authority that is already stretched) of both "extraordinary traffic" and causation; • Reactive rather than preventative; and • Uncertain in outcome, not least as the Applicant retains discretion in relation to reimbursement. • Reliance on Section 59 would therefore disproportionately transfer risk and resource burden onto the highways authority, rather than ensuring that impacts are properly mitigated at source. TDC's position is that proactive, effective and secured mitigation is required. Our view is that such mitigation: • Is necessary, given the scale of traffic impacts at PAR30; • Is directly related, as it arises solely from the Applicant's construction activity; and • Will be proportionate, as any compensation or remedial works must be evidence-based and linked to actual damage.	The record of condition surveys will be carried out in accordance with commitment GG06 in **7.2 Outline Code of Construction Practice [Revision E]**. In addition to the above, the **7.3 Outline Construction Traffic Management Plan [Revision D]** was updated at Deadline 4 to include a commitment to undertake drive through surveys. Paragraph 5.2.3 states how prior to works commencing, the Main Works Contractor(s) will undertake a drive through survey of all PARs with the relevant LHA (unless agreed otherwise), with a focus on highway condition including pre-existing issues; road user safety including signage; vegetation clearance and locations where 'siding out' to remove debris/dirt/mud overspill could be used to increase the effective width of existing narrow footways. It is anticipated that the rural routes will be the focus of the drive through survey. This drive through survey will form the basis of any agreements for further mitigation measures – such measures to be necessary to the Project and reasonable – along with the parties responsible for delivery of any measures. The final mitigation measures will be agreed with the LHAs as part of the final CTMP.
	Tendring District Council [REP4-337]	Page 13 – Construction Traffic and Noise Controls (Bentley Road) The Applicant's own Environmental Statement identifies that up to 16 residential receptors on Bentley Road would experience significant adverse effects (SOAEL) without mitigation. Notwithstanding this, the Applicant proposes to defer identification of detailed mitigation to the contractor stage. TDC has repeatedly explained that this approach is unsatisfactory, particularly given that: • The worst-case (unmitigated) impacts are already established and therefore known for all involved including NGET, including that the proposed mitigation measures are generic, limited, and in several cases not demonstrably enforceable; and several measures (e.g. behavioural controls, use of quieter plant) lack sufficient detail to demonstrate effectiveness. In particular: • Temporary speed limits are of limited value without enforceable mechanisms (yet to be provided); • "Good practice" measures are inherently difficult to monitor and enforce; • Acoustic screening proposals are impractical for many affected receptors and may introduce additional adverse effects such a loss of outlook/loss of daylight / sunlight into habitable rooms given to close proximity of many properties to Bentley Road. It is therefore premature and unjustified to conclude that residual significant effects (after 'mitigation') would be limited to a single property (Jasmine Cottage). TDC maintains that robust, secured and site-specific mitigation for all properties identified along Bentley Road	Controls on HGV movements: **7.3 Outline Construction Traffic Management Plan [REP4-174]** was updated at Deadline 4 to provide additional detail on the monitoring and management of construction traffic movements. Paragraphs 5.4.18 and 5.4.19 have been updated to state how the Main Works Contractor(s) will develop a booking/scheduling system to schedule HGV deliveries to site throughout the construction period. This system will enable a three-month look ahead, to understand the predicted HGV deliveries (movements), per site access point in advance. The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within the **7.11 Transport Assessment [APP-333]** and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents and the Applicant's EnvCoW considers that these would have the potential to introduce materially new or materially different residual effects, the Main Works Contractor(s) will discuss with the Applicant and the relevant Local Highway Authority, and National Highways where appropriate, suitable steps to avoid or mitigate such effects. The Applicant and its appointed Main Works Contractor(s) will develop a monitoring framework, which will include potential mitigations, as part of the final CTMP. Given the robust arrangements that would be available to monitor and review these traffic movements, the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary. Specifically with regards to noise, commitment NV24 was introduced to **7.2 Code of Construction Practice [REP4.164]** at Deadline 4, committing to a bespoke noise mitigation strategy at Jasmine Cottage, where residual

Hearing Action Point	Interested Party	Response	Applicant Comment
		(that will experience significant adverse effects (SOAEL) without mitigation) can be and must be identified at this stage, including: • Controls on HGV movements (daily caps and time restrictions); • Restrictions on sensitive periods (e.g. school times and evenings); • Low-noise surfacing and traffic management measures; • Property-level mitigation where necessary; and • Real-time monitoring with enforceable thresholds and response protocols. Such measures clearly satisfy Regulation 122(2): • Necessary, due to the severity of impacts at PAR30; • Directly related, as they mitigate N2T construction traffic effects; • Proportionate, reflecting the exceptional scale of the N2T impacts.	significant adverse effects are expected in the absence of such a strategy due to the limited mitigation options for this receptor. Additionally, commitment NV24 commits to bespoke noise mitigation strategies at the other 16 properties along Bentley Road should residual significant adverse effects be likely following further detailed review of construction traffic noise and potential mitigation options. The bespoke noise mitigation strategies will avoid significant adverse effects at applicable receptors principally through the introduction of sound insulation measures, such as glazing and ventilation and fencing, such that suitable internal and external sound levels are achieved.
	Tendring District Council [REP4-337]	Page 16 – Health and Wellbeing Monitoring Framework TDC does not agree with the Applicant's conclusion that no significant health effects arise. The Council has previously set out concerns that impacts have been systematically underestimated. In the absence of a robust and agreed assessment baseline, the Applicant's conclusion that monitoring is unnecessary is not reliable. Accordingly, TDC considers that a Health and Wellbeing Monitoring Framework remains justified, and that dismissal of such measures on the basis of a disputed assessment is inappropriate.	The Applicant does not agree with the Council's comments. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** has been informed by relevant guidance and good practice and represents a proportionate and robust approach for a Health and Wellbeing assessment for a project of this scale and nature. The Applicant maintains the position provided on page 16 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and does not consider a planning obligation to secure a health and wellbeing monitoring framework is necessary.
	Tendring District Council [REP4-337]	Page 17 – Safe Movement Package At present, insufficient detail has been provided by the applicant regarding the content and delivery of the current proposed measures. This position reflects the lack of clarity from the Applicant, rather than any in principle objection.	The Applicant provided a response to this matter in response to ID 14.18 (page 744) in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. As noted in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, impacts, management proposals and indicative durations for each affected PRoW are contained in the **7.6 Outline Public Rights of Way Management Plan [Revision C]** and are mapped on **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-039, REP4-019, REP4-020]**. Where PRoWs interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented in line with **7.6 Outline Public Rights of Way Management Plan [Revision C]**. Proposals will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information and will be discussed with PRoW Officers at the relevant Local Highway authorities during the preparation of the final PRoW Management Plan, which will be submitted to, and approved by, the Local Planning Authority. The Applicant has also developed **7.3 Outline Construction Traffic Management Plan [Revision D]**, the purpose of which is to monitor, mitigate and manage the impacts around construction traffic.
	Tendring District Council [REP4-337]	Page 18 – Psychosocial Support and EMF Communications TDC notes the Applicant's position and welcomes the commitment to enhanced EMF communications, subject to review of the updated wording within the Outline Code of Construction Practice.	The Applicant welcomes the Council's comments.

Hearing Action Point	Interested Party	Response	Applicant Comment
	Tendring District Council [REP4-337]	Pages 20–21 – Community Liaison / Noise and Vibration Liaison Officer While TDC recognises that day-to-day construction responsibility rests with the Applicant, however effective oversight and responsiveness to issues require local capacity and dedicated resource. Absent such provision, there is a risk that complaints handling and enforcement burdens fall disproportionately on the local authority. TDC acknowledges that a request for a dedicated officer may struggle to meet Regulation 122(2). However, alternative mechanisms (e.g. through PPAs or other agreements) should be explored to ensure adequate resourcing.	The Applicant notes the Council's comments.
	Tendring District Council [REP4-337]	Page 24 – Compensation (Heritage) TDC recognises that a general heritage compensation fund may not currently satisfy Regulation 122(2). However, where direct, evidenced damage to heritage assets arises from N2T construction traffic: Mitigation or compensation would clearly meet all three tests, as it would be • Necessary, • Directly related, and • Proportionate to the harm caused. The Council emphasises the particular vulnerability of heritage assets along Bentley Road, especially those with shallow foundations, and want to reinforce that the risk and financial costs of repairs cause by N2T traffic should not fall on respective property owners.	Commitment NV04 of **7.2 Outline Code of Construction Practice [Revision E]** states that pre- and post-condition surveys will be conducted at buildings and structures (heritage assets and otherwise) at risk of damage (cosmetic or otherwise) from vibration from construction activities associated with the Project. Any damage (cosmetic or otherwise) deemed to be caused by the works will be rectified. Commitment NV04 is augmented by commitments NV01 and NV05 of **7.2 Outline Code of Construction Practice [Revision E]** which require the contractor to undertake detailed vibration assessments, identify specific mitigation measures in accordance with best practicable means (BPM), and document the mitigation measures in a Noise and Vibration Management Plan (NVMP). Additionally, where a risk of damage is identified, which would constitute a potential significant adverse effect, such works may be undertaken via a Section 61 agreement, as per commitment NV03 of **7.2 Outline Code of Construction Practice [Revision E]**, through consultation with the Local Planning Authority.
	Tendring District Council [REP4-337]	Page 28 – Community Impact Mitigation Fund TDC accepts that this proposal may not strictly meet Regulation 122(2). However, the absence of compliance with the Regulation does not negate the existence of impacts. TDC therefore remains committed to ongoing discussions under wider community benefit frameworks.	The Applicant is preparing a community funds package, which would be delivered outside the development consent process, as per the Community Funds for Transmission Infrastructure: Guidance[3]. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community funds are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
	Tendring District Council [REP4-337]	Page 29 – District-Wide CTMP TDC is not specifically asking for a financial contribution. TDC's position relates to the need for more mitigation, effective coordination and collaborative working. Regulation 122(2) is therefore not directly engaged.	The Applicant maintains the response provided on page 29 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and in response to ID 12.11 on page 741 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant's response referred to its commitment to joining and engaging with the Developer's Forum to be set up by Essex County Council and other measures set out in **7.3 Outline Construction Traffic Management Plan [Revision D]**.
	Tendring District Council [REP4-337]	Page 30 – Shared Use of Infrastructure TDC notes the 'commitment' by the applicant but considers it insufficiently detailed, merely a commitment and therefore of limited	The Applicant's commitment to liaise with Local Highway Authorities, National Highways and other developments to ensure a coordinated approach to construction traffic management is set out in Section 6.6 of **7.3 Outline**

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

Hearing Action Point	Interested Party	Response	Applicant Comment
		weight at this stage. The Council seeks clear, enforceable provisions, rather than high-level commitments, and reserves its position pending further information.	**Construction Traffic Management Plan [Revision D]**. The final CTMP is secured by Requirement 4, must be substantially in accordance with the Outline CTMP and approved by the relevant planning authority. The Project must then be carried out in accordance with the approved plans.
	Tendring District Council [REP4-337]	Page 31 – Community Communications TDC reiterates its disappointment at the Applicant's refusal to fund a Tendring-specific liaison function, for the reasons set out above.	The Applicant notes the Council's comments.
	Tendring District Council [REP4-337]	Page 32 – Monitoring and Adaptive Management TDC remains concerned that monitoring proposals lack clarity, specificity and enforceability. This is a critical matter requiring further detail and resolution. TDC anticipates engagement through the proposed Developer's Forum to support coordination.	Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]** details the Applicant's commitment to join and engage with the Developer's Forum to be set up by ECC.
	Tendring District Council [REP4-337]	Page 33 – Coordination Board TDC does not agree that additional monitoring or infrastructure is unnecessary. Given the scale and cumulative context of impacts, enhanced coordination mechanisms are justified. The Council reserves its position pending further detail.	The Applicant maintains the position set out on page 33 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and does not consider it necessary or appropriate to establish a Tendring NSIP coordination board with powers to require justified phasing adjustments and additional monitoring/monitoring equipment to be installed, as the Project will be delivered in accordance with the controls and approvals set out in **3.1 Draft Development Consent Order [Revision E]** (including the relevant requirements for construction management plans) and the Main Works Contractor(s) will retain responsibility for construction methodology and programming.
	Tendring District Council [REP4-337]	Page 34 – Emergency Access and Cumulative Impact TDC notes the Applicant's position but is concerned by the lack of meaningful engagement on this issue. This matter relates to the adequacy of mitigation and current inadequate coordination, rather than a request for additional benefits, and therefore Regulation 122(2) is not directly engaged.	The Applicant maintains the position provided previously and considers this matter can be addressed through proposed controls in **7.3 Outline Construction Traffic Management Plan [Revision D]** (see Section 6.6: Coordination with Other Developments/Events) and secured through Requirement 4 of **3.1 Draft Development Consent Order [Revision E]**.
	Thurrock Council [REP4-338]	The Council has been mentioned in Appendix E **[REP3-074]** in relation to landscape and visual, traffic and transport, health and wellbeing, and noise and vibration. The Council considers the agreements sought fall outside of the development consent order process and will continue to engage in discussions with the Applicant to achieve such matters. Therefore, the Council agrees with the Applicant's response to ExQ1 Gen 1.21.	The Applicant welcomes the Council's comments.

3.10 ISH2 Action Point 25

Table 3.9 Applicant's Comments on IP Responses to ISH2 Action Point 25

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 25 *Limits of Deviation 1 Local authorities to identify the*	**Braintree District Council [REP4-323]**	The Council has focused on identifying only those viewpoints which are considered critical to understanding the likely worst-case impacts of the scheme. The Council has requested that the Applicant provide worst case visualisations in respect of those residential receptors	The Applicant has proactively engaged with BDC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD Visualisations [Revision A]**. LoD visualisations from Residential Visual Amenity Assessment (RVAA) properties E7 and E8

Hearing Action Point	Interested Party	Response	Applicant Comment
most sensitive locations and specific viewpoints that they would like to see additional visuals of pylons within the limits of deviation (so as to further illustrate the worst case scenario). The list of viewpoints is to be agreed as soon as possible with the applicant, and submitted by the applicant at deadline 4 (Tuesday 12 May). The applicant is to submit the agreed visuals by deadline 5 (Wednesday 10 June)..		identified in the Local Impact Report under the Residual Visual Amenity Assessment (West Ford Farm Cottage (E7) and Whiteheads Farm (E8)). Given the scale and nature of the identified impacts, the Council considers that further worst-case visualisations at a wider landscape level are unlikely to materially alter the overall conclusions of significant adverse effect. As such, the Council does not consider it necessary to request additional viewpoints beyond those critical locations identified above.	have been submitted for Deadline 5. Please refer to **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]**.
	Brentwood Borough Council [REP4-324]	BBC has communicated viewpoints to ECC and these have in turn been communicated to the Applicant.	The Applicant has proactively engaged with BBC and ECC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD Visualisations [Revision A]**.
	Chelmsford City Council [REP4-326]	CCC defers to the Applicant on this matter.	The Applicant has proactively engaged with CCC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD Visualisations [Revision A]**
	Colchester City Council [REP4-327]	We request additional visualisations for the following VPs, showing the photomontages or wireframes at the limits of the LoD nearest to the VP to show the worst-case scenario: • VP 4.01 Boxted Airfield Memorial, Park Lane 601864 231238 1.2 Photomontage Representative of people living and moving around Langham, using the local road network and visiting Boxted Airfield Memorial. • VP 4.08 Fordham 592846 228137 0.5 Wireline Representative of people living and moving around Fordham and using the local road and PRoW network within open access land. Listed buildings at Fordham including Church of All Saints Grade I listed church. Close to NCN Route 13. • VP 4.11 PRoW south of Aldham (Aldham 15) 591755 225436 0.2 Photomontage Representative of people living and moving around Aldham and people using the local road and PRoW network. • VP 4.16 Langham Playing Field off School Road, Langham 602226 231760 1.7 Photomontage Representative of people within Langham, using local PRoW network and visiting Langham Playing Field. At edge of Stour Valley Project Area. • VP 4.24 Essex Way near Fordstreet 592120 227144 0.5 Photomontage Representative of people living and moving around the settlement of Fordstreet and using the Essex Way Long Distance Footpath and open access land within the Colne Valley. • VP 4.25 Essex Way, Mill Road, south of Fordham 592808 227246 0.2 Photomontage Representative of people along PRoW within the Colne Valley. • 4.37 Hines Close, Aldham 591714 225720 0.3 Photomontage Representative of residents in Aldham – this is critical due to proximity to residential receptors. • 4.38 Essex Way, West Bergholt 595759 227930 1.8 Wireline Representative of users of the Essex Way and residents in West Bergholt.	The Applicant has proactively engaged with CCC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD Visualisations [Revision A]**. The Applicant has provided LoD visualisations from Viewpoints 4.08, 4.11, 4.24 and 4.37. Additional visualisations were not produced for the other requested viewpoints by the Applicant due to distance as explained in the response to Action Point 25 at section 2.4 of this document.

Hearing Action Point	Interested Party	Response	Applicant Comment
	South Norfolk District Council [REP4-334]	SNDC has contacted the applicant to reach agreement on additional visualisations listed below. • 1.01- From Roman town Venta Icenorum, to illustrate worst case from this scheduled monument • 1.04- To illustrate worse case of the introduction of pylons and overheads in vicinity of Flordon Hall • 1.15- Showing the decent of the pylons into the Waveney Valley, in the vicinity of Church of St Remigius, Roydon • 1.22- Pylons within the valley, with St Remigius on skyline behind them • HE2a- Church of St Remigius – Angles Way • HE2b- Church of St Remigius • HE21- Elm Farmhouse – SNDC still has concerns that the viewpoint is not in the best position to assess impact of the proposal on the setting of LB No 1373558	The Applicant has proactively engaged with SNDC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations**. The Applicant has provided LoD visualisations from Viewpoint 1.22, HE2(i), HE2(ii) and HE21. Additional visualisations at the other requested viewpoints were not produced by the Applicant due to distance or because the view is represented by another nearby viewpoint.
	Suffolk County Council [REP4-336]	SCC and BMSDC requested that the pylon positions in key locations should be as shown on consented plans, unless otherwise agreed with the relevant planning authority and, where applicable, Historic England. In particular, crossing the Waveney Valley, Wortham Ling, around Mellis Common, north of Gislingham, at Wickham Skeith and through the Gipping Valley any changes and deviation should only be made in agreement with the relevant local planning authority and, where applicable, Historic England. Around Mellis Common, SCC has asked that visualisations be provided to demonstrate whether towers of a lower height would reduce visual effects on Mellis Common. Additional areas of concern in Suffolk Landscape and Visual terms regarding Limits of Deviation and request for additional visualisations and assessment. SCC and BMSDC have co-produced a below table and have shared this with the Applicant. [*Applicant note: table in REP4-336 not replicated – please see REP4-366 page 41].*	With regard to the LoD visualisations, the Applicant has proactively engaged with SCC to discuss this matter. A full response is provided in section 2.4 of this document and **8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations**.

3.11 ISH2 Action Point 28

Table 3.10 Applicant's Comments on IP Responses to ISH2 Action Point 28

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 28 *Provide more information on the technical reasons for other pylon types being discounted. Local authorities to provide further comments in writing in response to the discussion regarding the setting of St Remigius Church.*	**South Norfolk District Council [REP4-334]**	National Grid, in their consultations and discussions with SNDC never raised the T-Pylons, these discussions centred around undergrounding and lattice pylons. In the absence of appropriate visualisations, SNDC is unable to comment or assess the impact that alternative pylons may have on the setting of St Remigius Church. The proposal will result in a very visible modern and alien intrusion of industrial infrastructure into the Waveney Valley that will significantly alter the character of the landscape and will detract from the setting of the church within this landscape and the way in which it contributes to it. It is considered that a shorter version of the lattice pylon or alternatively a contemporary T pylon design will result in a similar modern and alien intrusion. The T-pylon, being an attention-grabbing design within the local context, would detract and draw attention away from the church as the most prominent local landmark. SNDC's Senior Design and Heritage Officer does not consider that a change in design would therefore mitigate the level of harm that we maintain to be moderate rather than low, and has the potential to increase it. The council's position remains that undergrounding would, with regard to impact on the significance of the grade I heritage asset and how the setting currently contributes to its significance, be the only effective way of mitigating the resulting level of harm.	The Applicant has provided further responses regarding the assessment of the Church of St Remigius in response to paragraphs 2.17 to 2.23 of the Written Representation from Historic England on pages 68-70 in **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, and in response to Item 8.3f (pages 42-43) in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. Justification of the route alignment through the Waveney Valley and discussion of pylon types has been provided in response to question LV 1.29 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. This discussed the reasons behind preferred pylon options and includes the assessment of harm upon the Church of St Remigius from a heritage perspective and the role the assessment has played into the selection of pylon options through the Waveney Valley. As detailed in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, updated visualisations are provided at Deadline 5 in **8.4.12.3 Response to ISH2 Action Point 28 - T-Pylon Visualisations**, which illustrate the presence of T-pylons in the landscape close to St. Remigius Church at viewpoints related to the church's setting. The Applicant agrees with the Council's view that the use of T-pylons in this location would be unsuitable and present a greater change to the setting of the Church of St Remigius than the lattice pylon design. In the T-pylon photomontages, parts of the infrastructure were masked (removed) where they were located behind foreground elements that appeared in the original photograph. The photomontages do not illustrate vegetation removal. Effects on landscape character within the Waveney Valley are summarised in response to question LV 1.29 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, significant effects would be experienced up to approximately 1.5 km from the Project.

3.12 ISH2 Action Point 30

Table 3.11 Applicant's Comments on IP Responses to ISH2 Action Point 30

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 30 *Dedham Vale 2 Mr Buxton for the Dedham Vale Society and Pylons East Anglia to review and if necessary provide a response to the applicants response to ExQ1 ALT 1.6 and LV 1.15 [REP3-074] and the applicants responses to*	**Dedham Vale Society [REP4-358]**	2. Although the technical background is complicated, and the Society advances what it says below with some diffidence, its concerns are straightforward. Central to these concerns is that, so far as the Society has been able to establish, National Grid has not produced to this examination a proper costing of a continuous underground HVDC cable along the actual onshore corridor from Norwich to Tilbury. The only body that has assessed that specific option, NESO, found it to be economically comparable with the overhead line proposal. National Grid disputes that finding but, so far as the Society has been able to establish, has not substituted its own analysis of that specific option.	Image 3.5 (page 37) of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, replicated below, included all of the HVDC options which were captured in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** discusses these alternatives in detail, which included a full onshore solution "Wholly 4 Ended HVDC Option" via Bramford to provide full flexibility that the AC proposal provides.

Hearing Action Point	Interested Party	Response	Applicant Comment
deadline 2 submissions (pages 197 to 206) ***[REP3-070]***.		3. While the Society is unable to resolve this point itself, it strikes it as imperative that the question be properly and transparently addressed before a decision is made on the DCO application.	

Image 3.5 Alternative Methods of Electricity Transmission – Cost Overview

Data =B21:N39from 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Cost base in 2020/21 prices

On-shore		EAN4 (AENC) OHL	EAS2 (ATNC) OHL	TOTAL	
	Wholly Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) Data from Table 10.1 page 80 + Data from Table 12.1 page 93	£355.20m	£539.30m	£894.50m	
		EAN4 (AENC) OHL	EAS2 (ATNC) OHL + Cable	TOTAL	
	Majority Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) [with 20km Cable] Derived by 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix D "Economic Appraisal"	£355.20m	£1,275.10m	£1,630.30m	*
		EAN4 (AENC) HVDC	EAS2 (ATNC) HVDC	TOTAL	
	Wholly 4 Ended HVDC Option Project Total EAN4 (AENC) + EAS2 (ATNC) Data from Table 10.1 page 80 + Data from Table 12.1 page 93	£2,381.50m	£3,473.00m	£5,854.50m	*
Off-shore		Offshore 1		TOTAL	
	Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury *Data from Table 14.2 page 110*	£4,096.50m		£4,096.50m	
		Offshore 1	Bramford HVDC Turn-in Cost	TOTAL	
	Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury *Data from paragraph 14.4.6 page 111*	£4,096.50m	£1,265.10m	£5,361.60m	*
*	Transmission System Comparable Options - Delivering System Benefits of Connecting to Bramford				

Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury would remain the lowest cost HVDC option. An onshore alternative following this sub-optimal design would not be lower than this cost. Our recent cost updates have shown for 25/26 price base that onshore HVDC cable costs 1.6x more than offshore cabling for the following reasons:

- Offshore HVDC
  - Up to 100km of single cable or 50km of bi-pole pair cables can be carried on an ocean-going vessel per laying campaign.
  - Jointing of the cables is only required every 100km for single cable lay or 2 joints every 50km for cable pair.
  - Cables ploughed uninterrupted for long distances without obstruction on cable crossings lower than on land.
- Onshore HVDC
  - Only circa 1km of single cable can be delivered within road limitation, weight and height for road transport.
  - Jointing of the cables is required every 1km for every cable.
  - Cables buried ploughed only 1km requiring joint pit every 1km. Multiple, road, rail, river, hedgerow, ditch boundaries require management.

Our cost evaluation for onshore HVDC is based upon cost differences experienced for the first long-distance HVDC deployments by the applicant on the first National Grid Eastern Green Link (EGL) HVDC projects.

8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (paragraphs 3.3.22 to 3.3.26) explains in detail why the "Majority Overhead Line option" at a cost of £1,630.30m should be compared with "Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury" at a cost of £5,361.6m, as these options are comparable in the way they address system need and system flexibility. For the reasons set out above an onshore version of "Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury" would be higher in cost than this option due to the 1.6x higher cabling costs for onshore cabling. Even over a 180km onshore cable distance, compared with a 220km offshore distance, at 1.6x cable cost the onshore cabling would still be more expensive. To be competitive with offshore, the onshore cable distance would need to be below 140km if the offshore is 220km long (220/1.6 = 137.5km).

Hearing Action Point	Interested Party	Response	Applicant Comment
			Therefore, the cost differential between the Project and the HVDC alternative is substantial: • "Majority Overhead Line Option" Cost £1,630.30m • "Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury" Cost £5,361.6m. The NESO report did not have the cost differential between onshore and offshore HVDC cable cost being 1.6x greater onshore as the report was completed prior to cost updates. NESO has continued to emphasise the independent need for the Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery5 page 8, which states: *'There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.'* Image 1.1 Impact of key projects for delivery in 2031 if not accelerated (Table from NESO Clean Power 2030 Report, Annex 2)

Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs
		Further Flex and Renewables	New Dispatch	
Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031
Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031

'There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.'

Dedham Vale Society [REP4-358]	*The statutory duty: section 85 CROW Act 2000* 6. Central to the Society's concerns is the duty in section 85 of the Countryside and Rights of Way Act 2000, which, as amended by the Levelling-up and Regeneration 2024, provides: *"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty [now National Landscape] in England, a relevant authority … must seek to further*		(a) The Applicant notes that Dedham Vale Society appear to accept that the duty does not prohibit any development in the National Landscape which causes harm to the National Landscape. This principle was clearly established in Campaign for the Protection of Rural England (CPRE) v Secretary of State for Housing, Communities and Local Government [2025]. This case related to the legal challenge by CPRE to the decision by the Secretary of State to permit 165 homes in Kent within a National Landscape.

Hearing Action Point	Interested Party	Response	Applicant Comment
		the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty." 7. Various points arise. a) The duty is to seek to further the conservation and enhancement purpose. This is a positive obligation to advance that purpose, not merely to have regard to it. It does not prohibit development etc. which does not further, but ways of doing that development which have less impact, or a positive impact, must be considered, and if feasible adopted. b) The duty must logically extend to the visual experience of the landscape, both from within it and from places from which it is visible. Thus, here the Society's concern extends to the character of the wider project as seen from within the National Landscape. c) The duty falls on the Examining Authority in making its recommendation and on the Secretary of State in making the decision. Obviously, the applicant National Grid will play a critical part in developing options for them to consider. d) The duty cannot be discharged by financial contribution alone, as addressed further below. e) NPS EN-5 at paragraph 1.1.5 reinforces the duty by providing that the network must be planned to ensure that the right kind of technology is brought online at the right time and in the right places. Here, the choice of technology directly determines the level of harm to the National Landscape. f) The strengthened section 85 duty came into force through the 2024 amendment after National Grid's alternatives assessment was substantially designed and conducted. National Grid's assessment of alternatives has not, so far as the society is aware, been revisited in light of this strengthened obligation.	CPRE's case that planning permission must be refused for any development of land which is found to be in any way harmful to the natural beauty of a protected landscape was rejected by the Court. Mr Justice Mould stated (our emphasis added): [62] '……***The language of section 85(A1) of the 2000 Act imposes no prohibition on the grant of planning permission for development which fails to conserve and enhance the natural beauty of a protected landscape***'. The approach set out by Mr Justice Mould in the CPRE case [63] '***recognises that in a case where development is found to result in harm to the natural beauty of a protected landscape****, the duty imposed by section 85(A1) of the 2000 Act requires certain matters to be addressed by planning decision-makers. It is an approach which is essentially reflected in the guidance issued by DEFRA in December 2024*'. He said matters should be expressed in terms of weight, and that the [63] '***duty does not and is not intended to displace the established evaluative character of the determination of planning applications****, which arises from the long-established principles that govern such decisions under sections 70 of the 1990 Act and 38(6) of the 2004 Act*'. Mr Justice Mould also set out how the section 85 duty operates in the exercise or performance of the statutory functions of the relevant authority. [47] '*…..The statutory language requires the relevant authority to fulfil the section 85(A1) duty in exercising or performing the function which engages that duty. It does not, however, displace the performance of that function in accordance with the terms in which it is to be exercised or performed under the statutory provisions under which it arises.*' Defra guidance[4] sets out how the Protected Landscapes duty is intended to operate and provides broad principles to guide relevant authorities in complying with it (emphasis added): '*The duty is intended to facilitate better outcomes for England's Protected Landscapes, which are in line with their statutory purposes.* ***The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities.*** *The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas.*' The Applicant has complied with its statutory duty pursuant to section 85 of the Countryside and Rights of Way Act 2000 as amended by section 245 of the Levelling-up and Regeneration Act 2023 in relation to the Project. Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** provides details of the routeing and siting studies that were undertaken in respect of the National Landscape. This provides details of the approach taken to mitigation and the application of the mitigation hierarchy – avoid, prevent, reduce, offset impacts in respect of the National Landscape. Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** sets out the reasoning behind the decision to route through the National Landscape and

[4] Department for Environment, Food and Rural Affairs (2024) *Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes*. https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes

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			consideration of the alternative options. Section 4 also details of how features within the National Landscape have been avoided. Full details of the decision making are contained within Section 5.5 of **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** which has been reviewed within the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**).The Applicant also provided further explanation in relation to this matter in response to written question LV 1.15 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant provided relevant comments on the application of the mitigation hierarchy in response to the answers provided by stakeholders to the first written questions and specifically LV 1.17 in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** on pages 282-287. This response highlighted that the Section 85 duty does not prohibit development or activities within the National Landscapes, nor does it prohibit development that causes harm to a National Landscape. The core legal framework for decision making on a development consent application remains section 104 of the Planning Act 2008 (please see **5.6 Planning Statement [APP-085]** for further details on the core decision making framework applicable to the application for development consent). As set out above, case law supports this interpretation of how the duty operates (as detailed in Section 2.2 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**). The National Policy Statements (NPSs) similarly do not prevent all development within the National Landscape which may have an adverse effect. Paragraph 5.10.32 of NPS EN-1 (2024) recognises the urgent need for energy infrastructure and seeks to balance this against the protection of National Landscapes in the exceptional circumstances test. Paragraph 4.2.17 of EN-1 (2024) provides that the Secretary of State will take as a starting point that CNP infrastructure will meet the test that development in National Landscapes requires exceptional circumstances to be demonstrtaed.**5.6 Planning Statement [APP-085]** considers this test and sets out how the Project satisfies the test. In relation to the duty to seek to further the purposes, Paragraph 5.10.7 of EN-1 (2024) states: '*For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development*'. The Applicant has rigorously assessed and considered the National Landscape as part of the Project design process in the exercise of the Applicant's statutory functions. The duty has been applied in seeking to avoid, reduce and mitigate the impacts of the Project on the National Landscape. In addition to the consideration and application of the duty during the design of the Project, the Applicant has also committed to a proposed legal agreement for the provision by the Applicant of a financial sum of £2,426,752 (Indexed). This will provide funds for measures to further the purposes of the National Landscape pursuant to the duty. The additional measures have been detailed in Section 6 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. The Applicant has agreed the Heads of Terms for the legal agreement to secure the measures with the National Landscape Partnership and Suffolk County Council, and a draft legal

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			agreement is currently being discussed and close to full agreement. The National Landscape Partnership confirmed at ISH2 that good progress is being made. It is notable that whilst Dedham Vale Society disagree with the decisions taken by the Applicant in relation to the National Landscape and the duty to seek to further the purposes, Dedham Vale National Landscape Partnership have confirmed in responses to ExQ1 that they are satisfied that the Applicant has properly applied the duty (Dedham Vale National Landscape and Stour Valley Partnership Responses to ExQ1[LV1.14, LV1.16] and LV1.17 [**REP3-119**]. See also Suffolk County Council's responses to the same ExQ1 [**REP3-086**]. It appears that Dedham Vale Society is nevertheless, in essence, tied to a more absolute position that all harm to the National Landscape must be avoided to meet the duty. (b) The Project has considered the effects of the Project on the setting of the National Landscape beyond the National Landscape boundary. This is set out in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** and Annex A Dedham Vale National Landscape Setting Study . The Applicant has committed to underground cable in Dedham Vale National Landscape and areas within the setting where significant effects on the special qualities may occur. (c) The Applicant acknowledges that the duty applies to National Grid and the Secretary of State in exercising and performing their respective functions in respect of the Project and the Application. The Applicant does not accept that the duty or policy related to the duty requires the Applicant to "develop options" for the ExA or the Secretary of State to consider. The Applicant has set out how it has applied the duty in relation to the Project in **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** and other documents and submissions to the Examination (see paragraph (a) above). It is a matter for the Secretary of State to determine whether it is satisfied that the duty has been fulfilled in relation to the Application. (d) Contrary to what is implied from Dedham Vale Society's response, the Applicant has not suggested, in relation to the Project, that the duty can be discharged by "financial contribution alone". Please see response to (a) above in respect of how the duty has been applied in relation to the Project design process including routeing, siting and use of alternative technologies. The proposed legal agreement for the provision by the Applicant of a financial sum of £2,426,752 (Indexed) will provide funds for measures to further the purposes of the National Landscape. See also the Applicant's response to ExQ1 LV1.16 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** in relation to the proposed fund. (e) The Applicant is unclear what point is being made in relation to Paragraph 1.1.5 of EN-5. Paragraph 1.1.5 does not cover the choice of technology. In any event, the choice of technology for the Project both within the National Landscape and within its setting, has been carefully considered pursuant to the duty and the NPS policy framework. See response to (a) above. (f) Section 4.5 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** explains how the Project design process incorporated regular reviews both before and after the coming into force of the amended duty (pursuant to section 245 of the Levelling-up and Regeneration Act 2023). The amended duty was addressed through this process.

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	Dedham Vale Society [REP4-358]	(8-10) The Society attended the hearing to address two connected matters: to set out the legal duty as above and based on that, why, so far as the Society can establish, the option of HVDC underground for the entire route has not been assessed as a continuous onshore option. For that would cause less harm than the HVAC solution to the National Landscape.	The Applicant has previously responded to comments suggesting a HVDC onshore alternative, as set out above in response to the Dedham Vale Society submission.
	Dedham Vale Society [REP4-358]	11. The Society has now considered APP-357 – the 2023 Strategic Options Backcheck and Review. National Grid repeatedly relies on it in this examination as having considered "all onshore alternatives including HVDC." The Society accepts that APP-357 considered a wide range of options. However, it does appear to be crucially lacking as to the point now raised. 12. APP-357 assesses the following onshore options for the northern section of the route (Norwich to Bramford, the EC5N boundary): four corridor variants – EAN1 to EAN4 – each considered in four technologies: AC overhead line, AC underground cable, AC gas insulated line, and HVDC underground. HVDC underground was therefore costed for the northern sections individually. 13. For the southern section (Bramford to Tilbury, the EC5/LE1 boundary), APP-357 assesses three corridor variants – EAS1, EAS2 and EAS3 – but these appear to be assessed as overhead line options only. The full-route HVDC option for the entire Norwich to Tilbury corridor is presented as "Offshore 1," which is described as a Norwich to Tilbury connection routed offshore – subsea – not as a continuous onshore underground cable along the currently proposed corridor or similar. 14. But the latter is the option that NESO assessed and found to be cost-comparable. The Society may have misread a complex document, and if so it would welcome correction. But its reading of APP-357 is that this specific option was not assessed. 15. Further, Table B in the APP-357 executive summary presents Offshore 1 at both 4,000 MW (capital cost £2,882m) and 6,000 MW (capital cost £4,097m). At paragraph EX.61, National Grid states that the 4,000 MW option "no longer provides the required capacity" because contracted generation has grown. This is National Grid's explanation for insisting on 6 GW. The Society notes that explanation, but the same table records the figure of £2,882m capital cost for a 4,000 MW option, which – even on the offshore routing – is materially closer to the overhead line cost than the £4,097m or £5,854m figures that are typically cited in this examination. This raises the question: what would the equivalent onshore underground option cost at 4,000 MW, and has that ever been calculated?	The Applicant refers to Image 3.5 from page 37 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, replicated above in response to Points 2 and 3 of the Dedham Vale Society's submission. This includes all of the HVDC options which were captured in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and the data from Table 10.1 and Table 12.1 of that document. **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** discusses these alternatives in detail, which included a full onshore solution "Wholly 4 Ended HVDC Option" via Bramford to provide full flexibility that the AC proposal provides. All of the Applicant's options for onshore evaluated four technologies: AC overhead line, AC gas insulated line, AC underground cable and HVDC underground cable. The Applicant refers to its response to Points 2 and 3 of the Dedham Vale Society submission, which explains why offshore HVDC has a lower cost base. In relation to the technical needs case, the Applicant set out in paragraph 3.8.1 (page 38) of **7.17 Strategic Options Backcheck and Review [APP-355]** the following technical needs case conclusions: '*3.8.1 As described above there are five distinct issues that need to be resolved by system reinforcements:* • *Provision of 9,928 MW of capacity across East Anglia EC5 Boundary and 7,520 MW of capacity across EC5N Boundary* • *Provision of 7,476 MW of capacity across the LE1 Boundary* • *Provision of 352.1 MW of capacity to the Sizewell Generation Group.* • *Provision of 3,480 MW of connection capacity from the Essex Coast Generation Group* • *Provision of 8,470 MW of capacity from the SC2 Boundary Group*.' The requirements for EC5 of 9,928MW and EC5N of 7,520MW mean that 4GW links would not provide sufficient capacity to meet these needs. When the Project commenced these values were lower, allowing the initial consideration of 4GW. This was addressed in paragraph 15.4.14 (page 124) of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, replicated here for completeness: '*15.4.14 Originally, the lowest cost offshore alternative option to meet the need was option Offshore 1 (Norwich Main to Tilbury) at 4000 MW with capital costs £2,882.2m and lifetime costs of £3,232m, in combination with SCD1/Sea Link or an alternative. However, this option no longer provides the required capacity of a minimum of 8,000MW across LE1 and EC5, since the updated contracted generation described in the needs case section of this report has increased. This option has been included in this report as it was considered when the contracted position allowed and disclosed previously. Option Offshore 1 is also suboptimal in technical terms relative to the optimal onshore combination of options (EAN 4 and EAN 2).*' Therefore, as indicated above a 4GW alternative no longer meets the Project need. Taking this into consideration alongside onshore HVDC costs being 1.6x higher than

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			offshore costs, there is not a lower cost solution that provides the need for the Project. As such, the most comparable cost options for meeting the need and system flexibility of the Applicant's proposal are: • "Majority Overhead Line Option" Cost £1,630.30m • "Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury" Cost £5,361.6m.
	Dedham Vale Society [REP4-358]	*ALT 1.5 and ALT 1.6 do not resolve the issue* (16-20). The Society is asking about an option for the whole route to use an underground HVDC solution.	As acknowledged by the Dedham Vale Society, the Applicant answered the questions as issued by the ExA and therefore any feedback on the questions should be directed to the ExA. The Applicant has however answered the Dedham Vale Society's query regarding whole route HVDC alternatives as set out in response to Points 2 and 3 of the Dedham Vale Society submission above.
	Dedham Vale Society [REP4-358]	*Capacity baseline (21-26)* The Society's question is simply this: why is 6 GW required for Norwich to Tilbury when 4 GW was accepted as equivalent for those projects, and what would a 4 GW onshore underground HVDC solution for this corridor cost? The Society notes that APP-357 itself provides a 4,000 MW figure for Offshore 1 at £2,882m capital cost. National Grid dismisses this on the basis that contracted generation has grown beyond 4,000 MW. The Society is not able to challenge that technical assessment. But it does raise the question of whether the same controllability argument that led National Grid to accept 4 GW for EGL3 and EGL4 applies equally here, and whether that has ever been transparently addressed in this examination. It is important that this be precisely clarified.	Please refer to the Applicant's position in response to Points 11 to 15 of the Dedham Vale Society submission, which set out that whilst a 4GW proposal was initially considered, the contracted generation requirements increased to the extent that a 4GW alternative is not sufficient to meet the Project need. This was reflected in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and taken into account in developing and appraising the options for the Project. The EGL3 and 4 projects have a joint needs case with the Grimsby to Walpole Project and North Humber to High Marnham project. In combination with these projects the EGL3 and 4 projects are required to provide 4GW of capacity across the multiple boundaries they cross. This is not the case for this project which is required to deliver a minimum of 6GW of capacity for any alternative. The EGL 1 and 2 projects traverse a distance of 768km combined. It is also correct that HVDC projects have fully controllable power transfer, whereas AC will deliver more capacity with less control. In the case of the EGL 3 & 4 project where only 4GW is required, comparing it with the 6GW AC alternative is correct. For the Norwich to Tilbury project where 6GW minimum capacity is required for any solution, AC or HVDC, the capacity has to be provided by the solution to meet the need. The analysis is consistent and appropriate across both documents which consider capacity needs, distance and requirements. Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, is identical to the one set out the EGL3 and 4 Strategic Options Report.
	Dedham Vale Society [REP4-358]	*National Grid's assessment of overhead line harms in other projects (27-29)* The Society is struck by the contrast between the framework National Grid applied when assessing overhead line harms for Sealink – a framework that led it to reject overhead lines – and the approach taken here. To reassure on the point, the Society suggests that National Grid should explain the difference in approach. The Society is aware that National Grid has given reasons why some of those conclusions do not apply to Norwich to Tilbury. But it notes that National Grid's own analysis in other projects identifies technical, environmental and deliverability advantages for HVDC over overhead line that are, at best, only partially acknowledged in its analysis for this project. Again, this warrants fuller explanation.	The Applicant set out in paragraph 3.8.1 (page 38) of **7.17 Strategic Options Backcheck and Review [APP-355]** the following technical needs case conclusions. '*3.8.1 As described above there are five distinct issues that need to be resolved by system reinforcements:* • *Provision of 9,928 MW of capacity across East Anglia EC5 Boundary and 7,520 MW of capacity across EC5N Boundary* • *Provision of 7,476 MW of capacity across the LE1 Boundary* • *Provision of 352.1 MW of capacity to the Sizewell Generation Group.* • *Provision of 3,480 MW of connection capacity from the Essex Coast Generation Group* • *Provision of 8,470 MW of capacity from the SC2 Boundary Group*.' The requirements of the NETS SQSS are to consider "worst-case" fault outages. These are generally based on one "worst-case" fault outage at a time. Therefore, the

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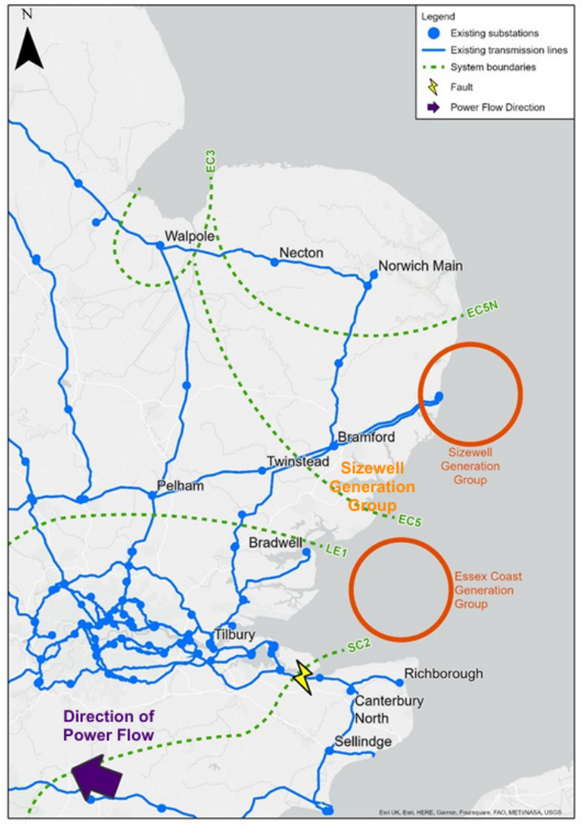
Applicant's design in particular utilises the Sea Link HVDC link to manage "worst-case" faults in:

- EC5 East Anglia by the Sea Link HVDC link exporting to Kent
- Sizewell Generation Group by the Sea Link HVDC link exporting to Kent
- SC2 Kent by the Sea Link HVDC link exporting to East Anglia.

The "worst-case" fault for Kent would be a SC2 boundary fault as illustrated below in Figure 3.6 (page 37) of **7.17 Strategic Options Backcheck and Review [APP-355]**.

Figure 3.6 SC2 boundary fault and impact



Paragraph 3.7.20 of **7.17 Strategic Options Backcheck and Review [APP-355]** (page 37) explains that, '*For the SC2 Boundary group the worst-case fault is for the double circuits connecting Canterbury North to Kemsley as shown in Figure 3.6, with the remaining circuit capability being 5,873 MW.*'

Under the above fault in Kent, the Sea Link HVDC would export energy from Kent to East Anglia, as all circuits in East Anglia would be available as required by the NETS SQSS design standard. Under this required credible scenario, Sea Link would export from Kent to East Anglia and therefore ensure compliance with the NETS SQSS.

This shows why Sea Link is the most coordinated, efficient and economical solution resolving multiple deficits in generation groups and boundaries, as the HVDC

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			solution in this case has the flexibility to not only resolve issues within East Anglia but also Kent, making it a highly effective transmission solution for the events explained. This flexibility of resolving multiple issues in each area is specific to Sea Link and lends itself uniquely to HVDC controllability and therefore is used appropriately. Norwich to Tilbury does not have these requirements to reverse directions for faults. However, Norwich to Tilbury is required for capacity and automatic flexibility under fault which lends itself to AC circuits which automatically maximise capacity and naturally respond to faults. Therefore, each technology has different advantages for each scenario. The application of each is consistent and interactions explained within **7.17 Strategic Options Backcheck and Review [APP-355]**.
	Dedham Vale Society [REP4-358]	*NESO report (30-33)* National Grid's April 2026 responses in REP-070 do not address the NESO study's whole-route onshore assessment. National Grid's general objections to HVDC – cost, supply chain, technical complexity – must have been available to NESO when it conducted its study. Overall, the question is properly asked: whether National Grid has produced, anywhere in this examination, a transparent substitute analysis of the specific option that NESO assessed, namely a continuous onshore underground HVDC cable along the full 184-kilometre corridor. Further and in any event National Grid's own cost comparisons do not appear to have quantified the socio-economic and natural capital impacts of the overhead line option on a basis consistent with the alternatives. National Grid's position, as stated in the REP-070 April 2026 responses, is that the Green Book does not apply to it. The Society reserves its position on that and supports the detailed submissions of Pylons East Anglia on the point.	Please see the Applicant's response to the Dedham Vale Society's points above which addresses the matters raised regarding onshore and offshore HVDC options. The NESO analysis does not take into account the cost differences set out. Our recent cost updates have shown for 25/26 price base that onshore HVDC cable costs 1.6x more than offshore cabling for the following evidential reasons: • Offshore HVDC – Up to 100km of single cable or 50km of bi-pole pair cables can be carried on an ocean-going vessel per laying campaign. – Jointing of the cables is only required every 100km for single cable lay or 2 joints every 50km for cable pair. – Cables ploughed uninterrupted for long distances without obstruction on cable crossings lower than on land. • Onshore HVDC – Only circa 1km of single cable can be delivered within road limitation, weight and height for road transport. – Jointing of the cables is required every 1km for every cable. – Cables buried ploughed only 1km requiring joint pit every 1km. Multiple, road, rail, river, hedgerow, ditch boundaries require management. Our cost evaluation for onshore HVDC is based upon cost differences experienced for the first long-distance HVDC deployments by the applicant on the first EGL projects. In relation to the Green Book, the Applicant maintains its position that the Treasury Green Book, which provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse, is not relevant to National Grid Electricity Transmission plc. There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a DCO application.
	Dedham Vale Society [REP4-358]	The East Anglia Connection Node (EACN) (34-35) The Society submits that any EACN should not be treated as a fixed and immovable constraint when costing HVDC alternatives. If a whole-route onshore HVDC option were to be properly assessed, that assessment should be conducted both with and without the EACN as a fixed intermediate connection point, so that the Examining Authority can understand the true cost of each scenario.	The Applicant has set out the relative costs of meeting the Project need case by different technologies including onshore HVDC within its response to CA 1.19 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. This is the appropriate comparison to make as costing any other scheme, such as that proposed by the respondent that does not meet the need case, would not be taken forward as it does not fulfil the necessary connection requirement.

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	Dedham Vale Society [REP4-358]	Cable ploughing (36-39) National Grid's cost comparisons for underground installation throughout this examination appear to assume conventional open-cut trenching. It understands that the technique of "cable ploughing", can instal underground cables in a narrow slit rather than an open trench, and is said to achieve a construction working width of under 10m compared to the 65 or 85-metre corridors assumed in National Grid's underground costings. The Society does not know whether cable ploughing would be technically feasible or cost-effective for all or any part of this route. It is not itself able to assess that. But the technique appears to be wholly absent from National Grid's cost comparisons.	The above responses set out differences between offshore and onshore HVDC cabling. The Applicant utilises cable ploughing offshore extensively for the evident reason set out below. The issues associated with onshore HVDC cables apply to AC onshore cables along with achieving the high thermal capacity which is required by these cables. It should also not be assumed that cable ploughing resolves all issues as numerous utilities pipes and cables need to be crossed along with multiple hedgerows and other features along with the challenges of installing each cable at greater separation than is achieved in trenching. Our recent cost updates have shown for 25/26 price base that onshore HVDC cable costs 1.6x more than offshore cabling for the following reasons: • Offshore HVDC – Up to 100km of single cable or 50km of bi-pole pair cables can be carried on an ocean-going vessel per laying campaign. – Jointing of the cables is only required every 100km for single cable lay or 2 joints every 50km for cable pair. – Cables ploughed uninterrupted for long distances without obstruction on cable crossings lower than on land. • Onshore HVDC and AC underground cables – Only circa 1km of single cable can be delivered within road limitation, weight and height for road transport. – Jointing of the cables is required every 1km for every cable. – Cables buried ploughed only 1km requiring joint pit every 1km. Multiple, road, rail, river, hedgerow, ditch boundaries require management. Due to the size of both HVDC and AC cables that the Applicant uses onshore, there is always a requirement for jointing every kilometre, and achieving thermal ratings makes installation methods critical to delivering capacity. The Applicant's proposed method ensures delivery of assets that meet the need requirements.
	Dedham Vale Society [REP4-358]	Financial contributions and the Section 85 duty (40-43) The mitigation hierarchy – avoid, mitigate, compensate, in that order of preference – is well established in environmental law and planning policy. Compensation, on that understanding, is appropriate only where avoidance and mitigation have been fully and genuinely considered and found not to be feasible. A financial contribution to the Partnership is, by its nature, compensatory: it funds activities elsewhere in the landscape but does not restore, undo or avoid the harm of the pylons, the cable swathe or the permanent vegetation clearance corridor within and visible from the National Landscape. The Society's concern is that if the prior questions of better avoidance/mitigation are feasible then a financial contribution at the compensation stage cannot make good that gap.	The Applicant has addressed the comments made regarding the application of the mitigation strategy in preceding responses to other questions from Dedham Vale Society.
	Dedham Vale Society [REP4-358]	The Society does not of course ask the Examining Authority on the basis of these submissions to conclude that whole-route HVDC undergrounding must be the way forward. But it does raise what are submitted to be valid questions in relation to its apparently not being considered. It asks that the questions it has raised be	Please see the Applicant's responses to Dedham Vale Society's points above which addresses the points raised in the submission. The Applicant acknowledges the requests made of the ExA in their submission and does not comment further as these are matters for the ExA. The Applicant will respond as appropriate to requests made by the ExA.

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		addressed transparently and in full before any recommendation is made.	
	Dedham Vale Society [REP4-358]	Accompanying papers: It is unclear what papers the Examining Authority has. The PINS index does not list the NESO or IET papers, but it must have them.	The Applicant acknowledges the supporting information provided and has responded to the points raised by Dedham Vale Society as appropriate above. A detailed response to each supporting document is not considered necessary as these are identified as being submitted for the benefit of the ExA due to their reference and/or reflection in the stated positions of the Dedham Vale Society.
	Villages Against Pylons [REP4-380]	It is a great shame that the Applicant continues to avoid the most fundamental duty set out in NPS EN5 2.9.12 and 2.9.21, that of the need to 'avoid altogether' the Dedham Vale National Landscape even if the 'resulting route is somewhat longer and more costly in consequence'. Their answers set out in Document 8.4.12 avoid the question entirely. For example, in their response to Little Horkesley Parish Council at 2.38 they speak of a host of relevant policies but not the one in question. This is a repeated pattern. National Grid fail to comment upon the acceptable harm to a National Landscape as set out in NPS EN5 2.9 which states that "residual damage is likely to be unacceptable in planning terms," and emphasises the need for robust mitigation or alternatives, such as undergrounding. Instead, they merely repeat that they have undertaken an assessment.	As a general point, the Applicant refers to its response to Dedham Vale Society [REP4-358] above which raises similar matters. With regards to visibility of the Project from Dedham Vale National Landscape, the Applicant has provided a response on this matter under LV 1.14 on pages 262 to 264 in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. In summary, the Applicant agrees that the Project would be visible from parts of Dedham Vale National Landscape, however the fact that a Zone of Theoretical Visibility (ZTV) plan suggests potential visibility does not necessarily equate to significant visual effects. The Applicant's response to comments on LV 1.14 as cited above in **[REP4-299]** also sets out its position on compliance with the NPS on undergrounding. In summary, the Applicant has acted in accordance with NPS EN-1 (2024) and NPS EN-5 (2024) in applying the strong presumption for overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 (2024) policies. Details are set out in **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]**. The Project has therefore complied with the relevant policies on undergrounding.
	Villages Against Pylons [REP4-380]	We strongly concur with the verbal evidence of the Dedham Vale National Landscape and Stour Valley Partnership made at ISH2: the Holford Rules have NOT been followed because they (National Grid) have NOT avoided the areas of highest amenity. We further concur that the use of undergrounding is a matter of policy, applied far too narrowly in the current proposals, and that it does NOT in itself satisfy the Section 85 requirement. Mr Amstutz is exactly right when he says that the cumulative impact of all of the infrastructure associated with the Norwich to Tilbury proposals, in terms of the impact to the setting of the National Landscape of the Dedham Vale, must be considered. This must include the impact of North Falls, Five Estuaries, Tarchon and any other project which seeks to connect to the infrastructure. We reiterate: the Applicant has failed in their proposals to apply the requirements set out in policy and in law and has failed to address these requirements when questioned. The proposals are incapable of approval in their current form due to their harm to special qualities of the Dedham Vale which go significantly beyond the merely residual. The proposals cannot further the purpose of the Dedham Vale due to the degree of damage and the payment of a trivial sum by the Applicant to National Grid would not ensure it. (To be capable of consideration the quantum of any payment would need to materially outweigh the financial harm when	Please refer to the above responses to Dedham Vale Society in relation to the how the duty to seek to further the purposes has been addressed by the Applicant. The Applicant has agreed measures to address the duty to seek to further the purposes of the National Landscape with the Dedham Vale National Landscape & Stour Valley, as set out in **8.3.1 Draft Statement of Common Ground - DVNL & Stour Valley [Revision C]**. With regard to cumulative effects on the National Landscape and its setting, the Applicant provided a response under LV 1.13 (b) in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. In summary, the assessment set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** judged that there is no potential for significant cumulative effects on Dedham Vale National Landscape due to limited visibility of the North Falls and Five Estuaries projects from the National Landscape. The updated cumulative assessment in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** also takes into consideration the Tarchon Interconnector based on the best information currently available. The scoping boundary for the Tarchon Interconnector is noted to be approximately 550 m south of the National Landscape boundary at its closest point. Paragraph 2.1.1.3 of the Tarchon Interconnector Project Environmental Impact Assessment Scoping Report explains, '*The UK Scheme Scoping Boundary represents the anticipated maximum extent of land and sea required to accommodate all potential development options for the final UK Scheme design*'. The Applicant notes that the Tarchon Interconnector Project will be required to undertake an Environmental Impact

Hearing Action Point	Interested Party	Response	Applicant Comment
		measure using the Treasury Green Book, and even then we would argue it to be inappropriate). The project must be routed entirely away from the Dedham Vale. It seems on the basis of National Grid's submissions, this consequently means that the EACN must also be moved entirely away from the Dedham Vale. Even if this is not undertaken, significantly more undergrounding would be required in order to eliminate views of pylons, sealing end compounds, and other infrastructure from with the Dedham Vale and to remove them from any external views of the Dedham Vale.	Assessment if and when they pursue their own necessary consents at some unknown point in the future, including the consideration of onshore cumulative effects for submission of their DCO application, when their siting and design is confirmed. The potential for significant cumulative landscape and visual effects is identified within Landscape Character Area (LCA) 7A Bromley Heaths and Visual Receptor Area (VRA) C13 as a result of the Project in addition to North Falls Substation, Five Estuaries Substation and the Tarchon Interconnector. This is because the scoping boundary for the Tarchon Interconnector comprises a large part of LCA 7A Bromley Heaths and VRA C13. It is therefore reasonable to consider there is potential for the Tarchon Interconnector to have adverse landscape and visual effects on these receptors but it will be for that project to determine as part of its application when made. For the avoidance of doubt, the Applicant has robustly assessed the potential for significant cumulative effects on Dedham Vale National Landscape as a result of the known projects that are likely to have an accumulation of impact when taken together with the Project, being North Falls and Five Estuaries. The cumulative assessment is set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and was updated at Deadline 4 in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. These documents set out and explain the Applicant's approach to cumulative assessment including which projects fit the definition of a project that ought reasonably be considered for that assessment. The Applicant has concluded that there are no cumulative effects on the National Landscape or its setting that would give rise to significant effects on the special qualities of the National Landscape. The Applicant has progressed negotiation of a section 106 agreement with Suffolk County Council, in conjunction with Dedham Vale National Landscape Partnership, which is now close to full agreement. The comments made by Villages Against Pylons about the adequacy of the proposed fund to be provided by the Applicant and other measures to satisfy the section 85 duty are not accepted. These and similar points are responded to in the response to Dedham Vale Society above. In relation to routeing and siting, the Applicant has responded to this point previously and the Villages Against Pylons comments in pages 274 to 277 of **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. In summary, the Holford Rules set out in paragraph 2.9.17 of EN-5 (2024) state that applicants should (not must), '*avoid altogether, if possible, the major areas of highest amenity value...*'. The reasoning behind the decision to route through the National Landscape and consideration of other options has been summarised in Section 4 of **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]** in addition to details of how features within the National Landscape have been avoided.
	Villages Against Pylons [REP4-380]	The Applicant admitted at ISH2 that they have assessed the Colne Valley as being of high sensitivity and that significant effects would occur up to 1.5km away. Few parts of the valley or its tributary valley are 3km wide. This amounts to an admission that significant effects would occur throughout the valley, yet no mitigation has been proposed. The Applicant also admitted that they have assessed the impact on the Ford Street Conservation Area and to many of the listed buildings within it as significant, yet no mitigation has been proposed. At no point during ISH2 did National Grid address the question they were asked: if this is a valley of special	The Applicant has reviewed the respondent's comment. The Applicant has responded to a point on the high sensitivity of the Colne Valley in response to LV1.28 in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [Revision A]**. It is agreed that significant effects would occur in the Colne Valley, as set out in previous responses including pages 686 and 687 of **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**.

Hearing Action Point	Interested Party	Response	Applicant Comment
		quality, which they admit, what assessment have they made or special consideration have they applied? The evidence of National Grid's representatives 'Rebecca' and 'Harris Casey' at ISH2 was that no special consideration has been applied. They applied precisely the same methodology they applied everywhere else. This is manifestly insufficient. In the absence of a landscape assessment by National Grid, Villages Against Pylons is supporting residents of the Colne Valley who will seek to commission a report by an appropriate expert. We hope that this will be available by Deadline 5 and would request that the ExA take note of this aspiration, but are understanding if it is slightly delayed. We fully support and echo the submission at ISH2 made by Fordham Parish Council: the proposals would entirely destroy the visual impact of the far reaching views within the Colne Valley and in particular from the Essex Way, which is one of the foremost footpaths in the Country. Although not within a National Landscape, the essential quality of this valley is not significantly different to that of the best parts of the Dedham Vale and it is worthy of protection. There is nothing within National Policy which prohibits undergrounding here and indeed it is recognised that in special locations and when impact is far reaching, which surely it is in this case due to the views of the valley visible from Colchester and due to the presence of the Essex Way and the high footfall there, undergrounding can still be appropriate.	The Applicant has responded to a point on mitigation in the Colne Valley and a response can be found in **Comments on oral summaries from ISH2** in response to Item 8.5: Mitigation, within this document. Methodology The Applicant notes that a landscape assessment has been carried out across the study area, including the Colne Valley, in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying appendices. The Applicant notes that the Pylons East Anglia Group have briefed a landscape consultant to undertake an additional study related to matters raised in relation to the Colne Valley and that this will be submitted at Deadline 5. The Applicant notes that the High-Level Landscape Susceptibility Appraisal (HLLSA) previously prepared by The Landscape Partnership in 2024 assesses the Colne Valley River Slopes and Colne River Valley Floor, and establishes high susceptibility and high sensitivity. This is in line with the landscape assessment prepared by the Applicant, which is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying appendices. The Applicant's assessment also recognises the Colne Valley Slopes Landscape Character Area (LCA) and Colne River Valley Floor LCA are of high sensitivity and susceptibility to the Project. With regard to the comment on undergrounding, the Applicant refers to its response to Action Point 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 NPS EN-1 (2024) and NPS EN-5 (2024). The location is not within nor within the setting of a nationally designated landscape. Landscape and visual effects are not considered to be widespread in this location, and thus do not meet the criteria in paragraph 2.9.23 of NPS EN-5 (2024). The response to REP1-164 on pages 9-10 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. Regarding Fordstreet Conservation Area, the Applicant has previously responded to Aldham Parish Council regarding this assessment in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**. The assessment of this heritage asset is 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]**.
	Villages Against Pylons [REP4-380]	In 8.4.1.2 National Grid state: "The setting of Highfield Farm (1225094), Kings Farmhouse (1266530) and Fordham Place (1222602), has been assessed by the Applicant. This has been carried out in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]**, and in line with professional guidance, including 'The Setting of Heritage Assets: Historic	The Applicant has reviewed the heritage assets raised in the respondent's comment. The assessment has concluded that the settings of the assets do not extend to the Order Limits and therefore the Project would not result in harm to these specific listed buildings. The setting assessment for these assets has been carried out in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**, and in line with professional

Hearing Action Point	Interested Party	Response	Applicant Comment
		Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment." It is remarkable that National Grid failed to identify harm and have included no relevant viewpoints in respect of these important listed buildings at the top of the Colne Valley, closest to the Dedham Vale for your consideration. At one of their open events, we were provided with visualisations from some of these locations which we have included below [*see **REP4-380***]. The impacts are, as you can see, devastating. We apologise for the quality of these graphics: whilst we were allowed to take photographs, we were not provided with high quality downloads. In order to mitigate the harm, the undergrounding section which commences at Great Horkesley should be extended through the Colne Valley to a point beyond Aldham, which would serve both to protect this valley and to substantially eliminate harm to the Dedham Vale (in the event that the latter is not 'avoided entirely').	guidance, including The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[5]. The assessment has not identified any instances of substantial harm to designated heritage assets for the Project, and the assessment conclusions of lower and mid less than substantial harm reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Therefore, the Applicant believes its assessment is robust and proportionate. Paragraph 7.2.57 of **5.6 Planning Statement [APP-085]** addresses the policy consideration of heritage impacts. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. The Applicant acknowledges that the Project would result in the loss of significance to heritage assets as a result of the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting, as detailed in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**. The Applicant also acknowledges the respondent's comment regarding the location of available heritage viewpoint assessment in relation to the assets in question. Whilst useful in the assessment of setting for heritage assets, heritage viewpoints have been used to inform assessments alongside landscape and visual visualisations, site visits, settings assessments and information from the sources set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The Applicant confirms that, at the time of the Development Consent Order submission, historic environment stakeholders, including Historic England, were engaged in selecting viewpoints and the corresponding visualisation types. The agreed viewpoints and their locations, and the visualisation formats to be used, reflected that feedback and informed the visualisation package accompanying the Project.

3.13 ISH2 Action Point 32

Table 3.12 Applicant's comments on responses to ISH2 Hearing Action Point 32

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 32 *Ardleigh and Little Bromley Ardleigh and Little Bromley Parish Councils (ALBA) to provide a list of suggested additional viewpoints. Applicant to provide further visuals as necessary at deadline 5 (Wednesday 10 June).*	Ardleigh Parish Council and Little Bromley Parish Council **[REP4-319]**	Enclosed is a document prepared by APC and submitted on behalf of the Parish Councils entitled "Viewpoints and Visualisations in the Ardleigh and Little Bromley Area". The document is accompanied by: a) Appendix A: Viewpoint Maps and Images; b) Appendix B: Correspondence with the Applicant (2025) [Redacted]; c) Appendix C: Bentley Road (PAR30) Visualisation Request *[Applicant note: the full content of this submission is not replicated in this document due to its length and the number of images however a full response is provided with reference to the Viewpoints proposed by the Parish Council].*	The Applicant has reviewed the ALBA submission **[REP4-319]** and the request for additional landscape and historic environment visualisations. The Applicant considers that the number of viewpoints assessed in the LVIA (206 across the Project as a whole) is considered to be proportionate and appropriate in relation to the scale of the Project. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. The conclusions of the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** or the Historic Environment assessment in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** will not change as a result of adding new illustrated viewpoints. Notwithstanding the above comment, the Applicant has considered the request for additional viewpoints and will provide photomontages from Bounds Farm, Hungerdown Lane and at the intersection between PRoW

[5] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

Hearing Action Point	Interested Party	Response	Applicant Comment
			Ardleigh 5 and PRoW Ardleigh 7/Green Lane at Deadline 6. The Applicant considers that these viewpoints would help ALBA to understand the effects of the Project on landscape, visual and historic environment receptors at these locations. Further information regarding the assessment of effects at the other requested viewpoints is provided below: • Viewpoint A - From the South of the A137 Ardleigh Conservation Area (CA26) - The location as shown on the image is not one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan (Place Services 2025). It is close to VP 3.11 which is informed by one of the identified key views in the conservation area appraisal and has informed the assessment of the conservation area. The assessment concluded minor adverse, not significant, effects during construction and operation (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**). • Viewpoint C - Mid-point on the Wick Lane causeway – there would be very close views towards the Project from the causeway where it crosses Ardleigh Reservoir at a distance of approximately 150 m from the proposed overhead line. The effect on visual receptors would be major and significant (adverse) as set out in paragraph 13.6.145 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. • Viewpoint D - From the North of Frating Road, near the boundary with Elm Park - It was agreed with heritage stakeholders that a VP from/across the 'Crop Mark Site S of Ardleigh' (1002146) scheduled monument would not contribute to the conclusion of assessment as the archaeology has no above ground remains and therefore this visual element of its setting does not provide a significant contribution to its value. The assessment concluded moderate adverse, significant, effects during construction and minor adverse, not significant, effects during operation (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**). • Viewpoint E - Intersection between PRoW "Ardleigh 3" and PRoW "Ardleigh 24" – there would be very close views towards the Project from PRoW Ardleigh 3 and Ardleigh 24, at a distance of approximately 50 m from the proposed overhead line. The effect on visual receptors would be major and significant as set out in paragraph 13.6.114 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. • Viewpoint F - Edge of Scheduled Monument (1002146) site at intersection between PRoW "Ardleigh 28" and PRoW "Ardleigh 29" – Please see response to Viewpoint D. • Glebe Corner "Local Green Space 6", Ardleigh – there would be very close views towards the Project from Local Green Space 6 to the east of Ardleigh, at a distance of approximately 100 m from the proposed overhead line. The effect on visual receptors would be major and significant as set out in paragraph 13.6.145 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. • Fishing Lake "Local Green Space 1", Ardleigh – there would be very close views towards the Project from Local Green Space 1, where the Project would oversail the fishing lake. The effect on visual receptors would be major and significant as set out in paragraph 13.6.145 of **6.13.A3 Environmental**

Hearing Action Point	Interested Party	Response	Applicant Comment
			Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. • Little Bromley Road, towards the junction with Hungerdown Lane – there would be very close views towards the Project from near the junction between Little Bromley Road and Hungerdown Lane, at a distance of approximately 100 m from the proposed overhead line. The effect on visual receptors would be major and significant as set out in paragraph 13.6.159 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. • Bentley Road (PAR30), Little Bromley – the Applicant notes that visualisations have been requested to illustrate vegetation removal along Bentley Road. Vegetation removals are shown on sheets 14 to 16 of **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section C [REP4-031]**.

3.14 ISH2 Action Point 34

Table 3.13 Applicant's comments on responses to ISH2 Hearing Action Point 34

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 34 *Colne Valley* *Provide written response to comments made at the hearing, in particular regarding the differing characteristics of the Colne Valley in terms of topography and whether the approach to the selection of the proposed pylon route has varied given these characteristics.*	**Colchester City Council [REP4-327]**	In the Colne Valley section of the landscape and visual thematic hearing, the ExA asked a question which was along the lines of 'the Colne Valley is obviously special. CCC consider that the simple answer to the ExAs question is they have acknowledged the harm will be significant in visual terms but have not taken that into consideration as they have not made any attempt to limit the harm. The Applicant has not made any attempt to respond to the site in this location, nor deal with the topography.	The Applicant has reviewed the respondent's comment. The Applicant provided a response at Deadline 4 to this point at Action Point 34 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** which in summary states the full suite of Holford Rules amongst other factors are used to inform decision making, noting that in practical terms it is not possible to be compliant with all the Holford Rules, and a balance needs to be achieved. These rules take into account the differing characteristics of the landscape, including the topography.
	Mrs Penny Lang [REP4-411]	A National Grid quote from its own documentation, which I submitted as part of my Consultation Response document in 2022 under: Main Risks, constraints and opportunities states … *"It is possible that multiple significant adverse effects would arise as a result of change to setting of listed buildings between Aldham and Little Tey from an OHL. Normal routeing and siting practices can be expected to afford some mitigation potentially along with additional reinforcement of planting to strengthen screening, though some consent risk to an overhead line solution may remain that may warrant consideration of further measures."* It would appear these 'further measures' were not investigated.	The Applicant has reviewed and acknowledges the respondent's comment. The Applicant has provided a response regarding the cumulative heritage impact and considerations within Colne Valley in response to Items 8.3q and 8.3n in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. In response to the point relating to 'further measures', a response can be found in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302],** response to Item 8.5: Mitigation.
	Mrs Penny Lang [REP4-411]	There is a long distance footpath, the Essex Way, which runs through Aldham, with paths leading off to the large network of footpaths in the village, which are well used by residents and visitors alike. The construction of giant pylons would be a serious deterrent to their use.	With regard to effects on users of the Essex Way, the Applicant has undertaken a sequential assessment of effects in paragraphs 13.12.84 to 13.12.121 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Visual receptors travelling on the long distance route are identified as being of high sensitivity, and effects would range from major and significant (adverse) to no effect (not significant).
	Mrs Penny Lang [REP4-411]	There is also a potential risk to health. A quote from National Grid's book, on Electromagnetic Fields (EMF), notes there is "some scientific	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has specific policies for

Hearing Action Point	Interested Party	Response	Applicant Comment
		evidence suggesting a possible link between unusually high exposure to magnetic fields and childhood leukaemia. Based on this evidence, magnetic fields are classed by the World Health Organisation (WHO) as 'possibly' carcinogenic'."	managing EMFs, which includes both numerical exposure guidelines to protect against established acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These policies were adopted by government on recommendation by the UK Health Security Agency and are incorporated into the decision-making process for development consent in NPS EN-5 (2024). The precautionary policies introduced were based on recommendations from the Department of Health's established Stakeholder Advisory Group on Extremely Low Frequency Electric and Magnetic Fields, who specifically considered childhood leukaemia. The evidence concerning compliance with these policies, including the numerical guidelines and precautionary policies, is included in **7.8 Electric and Magnetic Field Compliance Report [REP3-034]**. Further details regarding the process by which these policies were formulated and adopted is provided in response to questions HW 1.5 and HW 1.6 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
	Mrs Penny Lang [REP4-411]	Holford Rule 3 states that the most direct line must be chosen. Aldham is a flat area, and it would seem that the Holford Rules (e.g.4 & 5, avoiding ridge lines) would be difficult to apply in hiding pylons. In order to avoid affecting the settings of the large quantity of above-mentioned listed buildings, and the Natural England Priority Habitat Inventory areas within Aldham (see above), it would appear to be impossible not to infringe Rule 3, above, because there would, I suggest, have to be too many Angle Towers, thus contravening Holford Rule 2. It would seem that best practice could not be observed. This is one of the fastest housing growth areas in the country, with the need for everyone to be able to enjoy their heritage and unspoiled open spaces only increasing in importance.	**7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**, **7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]** all set out how the Holford Rules and the presence of particular environmental features along the alignment have informed decision making on routeing. The EIA process and feedback from consultees inform the balance and defines proposals that are taken forward. The application of the Holford Rules involves balancing alternative solutions, which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
	Mrs Penny Lang [REP4-411]	Aldham Ecology and Biodiversity Landowners have been planting trees, copses and woodland in large numbers, some with government schemes, for decades. Diseased elms have been replaced since the 1970s. Hedgerows have been replanted by farmers and landowners to replace those which were taken out in the 1960s and 1970s. No mitigation would be acceptable, nor would it work. Wildflower meadows have been carefully established over many years, and through Stewardship schemes wildflower strips surrounding crops, providing for ground-nesting birds; and bees and other insects. All this and tending new trees represents a lifetime's work. Government Stewardship Schemes, maintained over years, are protecting great crested newts. More Government Stewardship schemes locally, have helped to re-establish barn owl habitats, directly around the proposed route.	It is unclear what is meant by 'no mitigation would be acceptable'. With respect to ecology and biodiversity, the Applicant has followed the mitigation hierarchy throughout the design process and mitigation measures are proposed where impacts cannot be avoided. These measures are tried, tested and proven to work. The Applicant agrees that wildflower meadows, like the majority of habitats in the UK, require active maintenance and management to maximise their value to biodiversity. The decline in biodiversity that has occurred in the UK in the past 50 years is well documented. Notwithstanding this, the Applicant has undertaken surveys to establish a baseline upon which to assess the ecology and biodiversity impacts and designed appropriate mitigation measures that have been incorporated into **7.2 Outline Code of Construction Practice [Revision E]** and **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. This includes measures to mitigate for impacts to legally protected species and species that are of conservation concern including great crested newt, badger, hedgehog, bats and birds.

3.15 ISH2 Action Point 39

Table 3.14 Applicant's comments on responses to ISH2 Hearing Action Point 39

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 39 *Diss to Thetford (PARs 8 and 9) Norfolk County Council to provide further comments and an update on discussions.*	**Norfolk County Council [REP4-332]**	In Table 4.26 of their response to local impact reports **[REP2-030]** the Applicant claims that there is no 'step change' in the performance of junctions on PAR 8. Nevertheless, their junction modelling does show deterioration in performance by overloading junctions past their capacity. The Applicant has committed to providing further modelling to allow us to examine the impact in greater detail but we have not received this to date. NCC has a meeting with the Applicant on Wednesday 13 May to discuss highway matters in detail. A further update will therefore follow in the next update to the statement of common ground.	The Applicant will be providing NCC with supplementary modelling undertaken for the inter-peak period at junctions through Diss, in addition to a technical note which presents the Diss access strategy and route options, modelling undertaken through both Diss and Thetford, and identifies the reasoning as to why the route through Diss is environmentally important. The Applicant has and will continue to engage with NCC on their concern for routeing construction traffic through Diss following their review of the additional information to be submitted at or in advance of Deadline 5.

3.16 ISH2 Action Point 43

Table 3.15 Applicant's comments on responses to ISH2 Hearing Action Point 43

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 43 *Abnormal Indivisible Loads: cumulative impacts* *Applicant and local highway authorities to provide in writing an update on cumulative impacts of AIL routing and progress with route assessments, including structural assessment.*	**Essex County Council [REP4-328]**	Appendix E contains a table which provides the latest situation in relation to the structural assessments of 35 structures on the AIL routes. In summary, of the total 35 structures, 3 No. can accommodate the AILs with the remaining 32 No. requiring further work to determine whether the structures can accommodate the AILs. [*Table appended to Appendix E of REP4-328 providing the latest situation on structural assessments of 35 structures on AIL routes].*	With information received since Deadline 4, the Applicant agrees with the status for all assets as listed by ECC in the table provided in Appendix E and will continue to engage with ECC on the appropriate matters. For those noted as requiring a height check (listed by ECC as ID 12, 13, 14 and 23 in Appendix E), AILs are proposed to pass under the structures only, with the largest anticipated vehicle being equal to but not greater than 5m.
	Norfolk County Council [REP4-332]	NCC's understanding is that the project does not require AILs to travel through Norfolk. On this matter therefore, NCC defers to the local highways authorities which are affected by AILs.	The Applicant would like to clarify that the Large Mobile Crane qualifies as an AIL vehicle, for which routes are proposed through Norfolk – these are noted in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**. The larger AIL vehicles required for Cable Drum and Transformer deliveries, however, are not proposed to travel through Norfolk. Regarding structural assessments, feedback received previously from NCC has confirmed no assessments are required for the structures identified as interacting with the Large Mobile Crane.

3.17 ISH2 Action Point 46

Table 3.16 Applicant's comments on responses to ISH2 Hearing Action Point 46

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 46 *Non-primary access routes (PARs)* *Applicant and Suffolk County Council to discuss the inclusion of non-PARs in the outline construction traffic management plan (CTMP) and the assessment of environmental effects, and provide further written comments to summarise the issue and discussions to date.*	**Sussex County Council [REP4-336]**	SCC welcomes the inclusion of the Non-primary access routes into the oCTMP, however would like to see more information on these including estimated vehicle numbers, length of time the route will be used for and what the routes are.	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. 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 considered feasible to identify each of the routes and access points associated with each of these activities. 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 3 weeks. The most onerous activity is the construction of bellmouths, with approximately 20 daily HGVs. 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.

3.18 ISH2 Action Point 47

Table 3.17 Applicant's comments on responses to ISH2 Hearing Action Point 47

Hearing Action Point	Interested Party	Response	Applicant Comment
ISH2 Action Point 47 *CTMP and Construction Workers Travel Plan (CWTP) (and appendices) Assess the use of tailpieces and other non-committal forms of wording in the CTMP and the CWTP to make these as binding and enforceable as possible, and amend as necessary for submission of the next versions of the documents*	**Colchester City Council [REP4-327]** [note, also provided in response to Hearing Action Point 48 - *Driver's information pack Provide detailed information and explanation of the proposed drivers information pack in the outline CTMP so the ExA can be satisfied that the information in the final driver's information pack will be effective.]*	Non-committal wording and tailpieces are unacceptable as they are impossible for host authorities to enforce against. Clear, precise and negatively worded control documents must be used. CCC note and agree with the ExAs concerns that relying on a Drivers Information Pack/handbook for HGV and other delivery drivers is wholly unacceptable. Expecting every HGV driver to read a detailed handbook and then expecting them to follow it to the letter every day is completely unrealistic when HGV drivers are under significant pressure to make deliveries at pace and return to their depot. This fails to acknowledge that subcontractors will be used as will deliveries arrive directly from suppliers as this is the nature of a huge and complex application such as this one. The suggested approach appears to be completely unenforceable.	The Applicant responded to the ExA's request by providing detailed information and clarification on the proposed driver information pack, to ensure that the final version will be effective, as set out in Action Point 48 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The Applicant considers the detail provided within this response is sufficient to address Colchester City Councils comments. Section 6.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]** has been updated at Deadline 5 to provide additional detail on the driver information pack, reflecting the information provided to the ExA in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The Applicant has reviewed the wording within **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [Revision B],** to reflect commitments and provide enforceable commitments. This will be submitted at Deadline 5.

4. Comments on Oral Cases from ISH2

4.1 Comments on the Oral Cases from ISH2 (28 April 2026)

4.2 Agenda Item 4 (Noise and Vibration)

Table 4.1 Item 4 (Noise and Vibration)

Item No.	Third Party Comment	Applicant's Response
4.1 Noise and Vibration - Piling		
4.1a	Braintree District Council [**REP4-323**] The Council acknowledges that, during typical construction hours defined in BS5228-1 (i.e. 07:00–19:00 Monday to Friday and 07:00–13:00 on Saturdays), exceedances of the 65 dB LAeq,T 'ABC' threshold may in some cases be relatively small. However, this position does not account for the extended construction hours sought by the Applicant, which go beyond those standard periods. BS5228-1 is clear that periods outside 07:00–13:00 on Saturdays should be treated as more sensitive, with a corresponding lower threshold of 55 dB LAeq,T. On this basis, noise levels which may only marginally exceed thresholds during standard hours would result in materially greater exceedances during these more sensitive periods and should therefore be regarded as giving rise to significant adverse effects. The Applicant's assessment does not robustly demonstrate a true worst-case scenario, particularly given the flexibility afforded by the Limits of Deviation and the reliance on assumed noise reductions through BPM which are not secured at DCO stage. The Council is not satisfied that the application of BPM alone provides sufficient certainty that significant adverse effects would be avoided, particularly during extended or more sensitive working periods. The Council therefore maintains that additional controls are required through the DCO to restrict piling activities at specific pylon locations and during sensitive times, in order to adequately protect residential amenity.	Commitment NV23 was reworded in **7.2 Outline Code of Construction Practice [REP4-164]** at Deadline 4 to provide clarity on the potential use of percussive piling as a last resort and commits the Applicant to providing details of locations where percussive piling would be unavoidably required following the completion of ground investigations, to the Local Planning Authorities. With regard to potential works outside 'weekday daytime' periods defined in BS 5228-1[6] (i.e. 07:00–19:00 Monday to Friday and 07:00–13:00 on Saturdays), the Applicant acknowledges that exceedance of the lower thresholds during these periods are more likely at locations close to noise sensitive receptors (NSRs). Should the thresholds be predicted to be exceeded at NSRs for specific activities, based on the detailed assessments to be undertaken by the contractor (as secured by NV05, and including mitigation secured by NV01, both of **7.2 Outline Code of Construction Practice [Revision E]**), temporal restrictions may be put in place for those activities to ensure significant adverse effects are avoided. Such temporal restrictions would form part of best practical means to control noise impacts, as secured by NV01 of **7.2 Outline Code of Construction Practice [Revision E]**. Works where construction noise levels may exceed the relevant noise level BS 5228 'ABC' threshold, should they be required at specific locations, would be undertaken via Section 61 agreements as per commitment NV03 of **7.2 Outline Code of Construction Practice [Revision E]** through consultation with the relevant local authority.
4.1b	Essex County Council [**REP4-328**] ECC acknowledges that the Applicant relies heavily on the proposition that the ES assessment assumes percussive piling at all pylon locations as a worst case, and that in practice non-percussive methods will be used. That appears reassuring, but in fact does the opposite of what the Applicant suggests. ECC considers that if the assessment genuinely treats percussive piling at every pylon as the worst case and concludes (with embedded mitigation in NV01 to NV04) that significant adverse effects will be avoided, then there is no environmental need for the qualifier "where practicable" at NV23. The substantive case has already been made on the worst-case footing. The qualifier is therefore doing on of two things: either it is redundant (in which case it should be removed), or it is reserving to the Applicant the ability to deliver less mitigation than the assessment assumed. NV23 is said to secure the principle that non percussive piling will be used "where [percussive piling] can be avoided". "Where this can be avoided" is not the same test as "where practicable". It is a tighter test, closer to genuine technical impossibility. If that is what the Applicant means, that is what the drafting should say.	Commitment NV23 was reworded in **7.2 Outline Code of Construction Practice [REP4-165]** at Deadline 4 to provide clarity on the potential use of percussive piling as a last resort and commits the Applicant to providing details of locations where percussive piling would be unavoidably required, following the completion of ground investigations, to the Local Planning Authorities.

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

Item No.	Third Party Comment	Applicant's Response
4.1c	Essex County Council [**REP4-328**] The Applicant did not identify locations near NSRs where percussive piling will be used. It instead said that the assessment "provides an indication of locations where percussive piling may lead to significant effects without mitigation, as well as identifies locations where there would be no constraints with regards to noise". That is a description of the assessment, not an answer.	Commitment NV23 clarifies that non-percussive piling methods are to be used as the default option and it is only where ground conditions reveal that percussive piling is unavoidable that percussive piling will be used. If percussive piling is unavoidably required, this would constitute best practicable means (BPM), as per commitment NV01 of **7.2 Code of Construction Practice [REP4-164]**. In most, if not all cases, where percussive piling is unavoidably required exceedance of the relevant BS 5228 'ABC' threshold would not be expected as most pylons are not located close enough to receptors for this to be the case. In situations, albeit unlikely, where the thresholds may be exceeded (i.e. where pylons requiring percussive piling are located close to receptors) these would be subject to the processes outlined in commitments NV01, NV03, and NV05 of **7.2 Code of Construction Practice [REP4-164]** (noting that these have been updated at Deadline 5) to avoid significant adverse effects.
4.1d	Essex County Council [**REP4-328**] The "where practicable" formulation is not appropriate. While the trigger is unpredictable in advance (it depends on ground conditions and the foundation works risk assessment), the determination should not be left to the Applicant alone and as a result, ECC suggests alternative drafting along the following lines: "*Non-percussive piling methods will be used for the construction of pylon foundations, save where the Foundation Works Risk Assessment carried out under commitment GH02 concludes, with reasons, that non-percussive piling is not technically feasible at a particular location"* A further suggested alternative could involve the LPAs, through further wording, such as: *"In any such case, the Main Works Contractor(s) will (a) prior to commencement of piling at that location, notify the relevant planning authority in writing of (i) the location, (ii) the reasons set out in the Foundation Works Risk Assessment, and (iii) the specific mitigation to be applied in accordance with commitments NV01 to NV04; and (b) record the reasons, the mitigation applied and the monitoring results, and make those records available to the relevant planning authority on request."*	Commitment NV23 was reworded in **7.2 Outline Code of Construction Practice [REP4-165]** at Deadline 4 to provide clarity on the potential use of percussive piling as a last resort and commits the Applicant to providing details of locations where percussive piling would be unavoidably required, following the completion of ground investigations, to the Local Planning Authorities. The Foundation Works Risk Assessment outlined in commitment GH02 of **7.2 Outline Code of Construction Practice [REP4-165]** relates specifically to selecting piling techniques with regards to minimising and avoiding the risk of introducing new contamination (if required), creating new contamination pathways, and mixing of aquifer bodies. Commitment GH02 is therefore in addition to the ground investigation works stated in NV23 **7.2 Outline Code of Construction Practice [REP4-165]** but does not cover all of the reasons why certain methods may be unavoidable. Commitments NV01, NV03, NV04, and NV05 of **7.2 Outline Code of Construction Practice** have been updated at Deadline 5 [**Revision E**] to clarify the process for construction noise and vibration management, including liaison with the local planning authorities. The process covers all works and is therefore applicable, in combination with NV23, for pylon construction where percussive piling is unavoidably required **7.2 Outline Code of Construction Practice [Revision E]**.
4.1e	Essex County Council [**REP4-328**] ECC also notes that the Applicant has separately accepted, in its DCO 1.S10 response, that it is "considering" Local Authorities' request to remove the word "percussive" from Requirement 7(2) so that all forms of piling are subject to the more restrictive working hours. ECC's NV23 drafting is consistent with that direction of travel: where percussive piling is genuinely unavoidable, the controls should bite harder than they currently do, not softer.	As stated in response to Item No. 4.1d, commitments NV01, NV03, NV04, and NV05 of **7.2 Outline Code of Construction Practice** have been updated at Deadline 5 to clarify the process for construction noise and vibration management, including liaison with the local planning authorities. The process covers all works and is therefore applicable, in combination with NV23, for pylon construction where percussive piling is unavoidably required **7.2 Outline Code of Construction Practice [REP4-165]**. In locations where construction noise levels may exceed the relevant BS 5228 'ABC' threshold (during any time period, and from any task/activity) these would be subject to Section 61 applications through consultation with the relevant local planning authority. The Section 61 agreement would secure mitigation measures, including temporal restrictions, to avoid significant adverse effects, and any monitoring requirements. This process would therefore serve to secure restricted working hours for certain activities where required, including, where applicable, piling (percussive or otherwise).
4.1 Noise and Vibration - Primary Access Route 30		
4.1f	Tendring District Council [**REP4-337**] The Applicant's own evidence identifies that at least 16 properties would experience significant adverse effects without mitigation, with TDC suggesting the actual number could be closer to 20. TDC challenges the robustness of the Applicant's conclusions, noting that while significant impacts are predicted in a worst-case scenario, the Applicant asserts that only one property would remain significantly affected after mitigation, despite the mitigation measures not yet being defined or tested. This approach is considered evidentially	Commitment NV24 was included in **7.2 Outline Code of Construction Practice [REP4-165]** at Deadline 4 with regard to the securing of noise mitigation for Jasmine Cottage and other properties along Bentley Road which may be significantly affected by noise from construction traffic. The same principles of mitigating noise from construction traffic will apply at all 16 properties as per Jasmine Cottage. However, with the exception of Jasmine Cottage (where standard measures were found to be NOT feasible), standard mitigation measures may be feasible at some or all other receptors, subject to review. Where standard mitigation measures are feasible and efficacious at avoiding significant adverse effects at receptors, this would negate the need for bespoke noise

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	unsound. Concerns are also raised that proposed mitigation measures are insufficiently detailed, largely generic, and in some cases unenforceable.	mitigation strategies at those receptors. Where the review identifies that standard mitigation measures are not feasible or efficacious at avoiding significant adverse effects at receptors, bespoke mitigation strategies would be developed for those receptors. For example, should the Applicant use the proposed North Falls/Five Estuaries haul road off Bentley Road, this would reduce the number of properties affected (i.e. construction traffic would not pass the properties north of the proposed North Falls/Five Estuaries haul road along Bentley Road). Additionally, localised screening may serve to reduce effects, where feasible (noting that this option was explicitly ruled out at Jasmine Cottage as it is not viable). As such, should standard mitigation measures be viable to reduce effects at these properties, bespoke noise mitigation strategies would not be required. However, should standard mitigation not be feasible, then bespoke noise mitigation strategies would be required, considering the same principles as Jasmine Cottage. With regards to vibration from construction traffic on the public highway, this was scoped out of the ES, as per ID 3.12.2 of **6.20 Scoping Opinion [APP-297]** on the basis that vibration from traffic is caused by irregularities in the road surface (e.g. potholes) and it is assumed that the road is well maintained. Vibration from highways works close to properties will be controlled by commitments NV01, NV04, and NV05 of **7.2 Outline Code of Construction Practice [Revision E]** (noting the updates to these commitments at Deadline 5).
4.1g	T Fairley and Sons [**REP4-375**] National Grid could mitigate some of the impact on a number of residents in Little Bromley, by utilising the temporary haul road proposed by North Falls and Five Estuaries for all construction traffic. The Projects should be required to coordinate rather than the current approach which leaves significant uncertainty for our Client and the residents of Little Bromley. Construction Periods The peak construction period for Norwich to Tilbury needs to be staggered with North Falls / Five Estuaries. If all three known Projects peak construction period coincide we estimate, from the figures quoted in the project documents, this could amount to 900 vehicle movements per day. That's more than 1 per minute assuming working hours of 7am – 6pm.	**7.3 Outline Construction Traffic Management Plan [Revision D]** states that Norwich to Tilbury construction vehicles will use, if it is available, the North Falls and Five Estuaries substation access road within the cable construction corridor between Bentley Road and Ardleigh Road. This would remove construction HGV traffic from a section of Bentley Road and a section of Ardleigh Road. The Applicant notes the points raised around coordination with North Falls and Five Estuaries regarding construction traffic. The Applicant will ensure liaison takes place by the Main Works Contractor(s) with other developments, including North Falls and Five Estuaries Offshore Wind Farm to ensure a coordinated approach to construction traffic management. Section 6.6. of **7.3 Outline Construction Traffic Management Plan [Revision D]** was updated at Deadline 4 to reflect the Applicant's commitment to joining and engaging with a Developer's Forum to be set up by Essex County Council, subject to agreeing suitable terms of reference, to continue and formalise project coordination. The Applicant envisages that when the build programmes are available from the Main Works Contractor(s) these will be brought to the Developer's Forum and discussed in conjunction with the development of the Final Construction Traffic Management Plan. Within **6.16 Environmental Assessment Chapter 16 – Traffic and Transport [APP-271]** an assessment on the significance of effects has been undertaken using daily peak construction traffic movements from the Project in combination with traffic movements from North Falls and Five Estuaries. During peak construction activity, which would occur over a one-week period, there would be a combined total of 2516 vehicle movements over a 12-hour period (07:00-19:00) on Bentley Road (PAR 30). This would equate to 210 vehicle movements an hour, which is four movements a minute (two movements in each direction). Of the total daily vehicle movements, there would be a total of 1250 HGV movements. This would equate to 105 HGV movements an hour, which is two movements a minute (one in each direction). No significant effects were identified within the assessment on Bentley Road (PAR 30), which is located between the junction with the A120 and the proposed haul road, to be shared by all Projects to bypass Little Bromley village. The assessment took into consideration the proposed highway mitigation which included localised carriageway widening to allow two-way movement of vehicles, and a shared use off-carriageway route for pedestrians and cyclists which aims to remove the potential for conflict between construction vehicles and pedestrians and cyclists. A summary of this assessment is presented within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**.

Item No.	Third Party Comment	Applicant's Response
4.1h	T Fairley and Sons [**REP4-375**] Noise: Normans farmhouse sits immediately adjacent to the construction sites, public road and the haul roads they will be using. The noise will be constant during construction for the family and the continued vibration potentially causing damage to the Property. From the discussion during ISH 2 it is clear that National Grid takes no account of resident's reasonable enjoyment of their gardens and outside space in their noise assessments.	Normans Farm is located approximately 800m away from the proposed East Anglia Connection Node (EACN) substation and associated construction works and as such significant adverse effects from construction noise and vibration are not expected (including potential structural damage). It is, however, noted that Normans Farm is located adjacent to the North Falls and Five Estuaries substations, which are separate projects. However, Norman's Farm is located adjacent to the Ardleigh Road, linking from the proposed haul road to the east. Highways works are proposed on Ardleigh Road adjacent to Normans Farm. Should the proposed North Falls/Five Estuaries haul road be used by the Applicant, this would bypass Ardleigh Road at Normans Farm. In either case, significant adverse effects are not expected at Normans Farm where standard noise mitigation measures are incorporated into the works. Best practicable means (BPM) will be employed via commitment NV01 of **7.2 Outline Code of Construction Practice [Revision E]** following the contractors detailed assessments, as committed to in commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E]**. Should exceedance of the relevant BS 5228 'ABC' thresholds be identified, works would be subject to Section 61 agreements, though the Control of Pollution Act 1974, through consultation with the local planning authority via commitment NV03 of **7.2 Outline Code of Construction Practice [Revision E]**. This would secure mitigation measures, including any temporal restrictions to avoid significant adverse effects, and any monitoring proposals. These measures will be incorporated into the Noise and Vibration Management Plan, as per commitment NV05 of **7.2 Outline Code of Construction Practice [Revision E**].
4.1i	T Fairley and Sons [**REP4-375**] Road Closures / Traffic Management: We have not been given any information on access arrangements to the Property, particularly Normans Farmhouse, for the family which is causing significant concern and apprehension. We have referred in previous representations to the disruption to farm operations as a result of potential road closures, which still are yet to be addressed.	Short, temporary road closure of Ardleigh Road is required to enable the safe construction of the permanent bellmouth, road widening and non-motorised user route. A diversion route as shown on Plans D and E of 2.5 Access, Rights of Way and Public Rights of Navigation Plans Section E [APP-037]. The works will be coordinated through the Essex County Council Permit Scheme, and access for residents will be maintained, as detailed in Section 5.8 of **7.3 Outline Construction Traffic Management Plan [Revision D]**.
4.1j	T Fairley and Sons [**REP4-375**] Statutory Undertaker Works: Based on experience elsewhere we expect that various works will be required by other statutory undertakers to facilitate this Project. These typically cause additional road closures, delays and vehicle movements that will not have been fully assessed at this stage but will only increase disruption to businesses and residents. We are requesting the Project to provide further information on other works anticipated in this area.	Third-party utilities diversions and/or modifications would be required to facilitate the construction of the Project. Within **7.3 Outline Construction Traffic Management Plan [Revision D]**, Section 1.8.5 and Section 2.24 detail that pre-commencement works would include diversion and laying of third-party services, protection works including utilities protection works or fencing and protection slabs, and demolition of existing buildings. These would take place in advance of the main construction phase in 2027. The indicative vehicle types associated with these activities, as set out in Table 5.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]**, are HGV (low loader/HIAB Wagon) / LGV (Site Vehicle 4x4).
4.2 Any other noise and vibration issues:		
4.2a	Essex County Council [**REP4-328**] ECC would also highlight it concerns regarding the Draft Onshore Substations Operational Noise and Outline Noise Complaints Protocol; Revision D of which has been which has been submitted by the Applicant. Throughout the examinations of both the Five Estuaries and North Falls projects, ECC and Tendring District Council consistently and clearly expressed that the proposed tripartite noise complaints protocol, in its current form, is not acceptable. In particular, concerns have been raised that the protocol lacks a genuinely joint panel approach to complaints assessment and includes investigation and response timescales that are unacceptably lengthy. As such, the protocol will require substantive revision before it could be considered acceptable for certification and 22 implementation. Any final protocol must ensure a robust, jointly managed and responsive process that prioritises the effective resolution of	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

Item No.	Third Party Comment	Applicant's Response
	complaints and safeguards residential amenity. It is intended that a revised and final protocol, addressing these concerns could be prepared and submitted to the relevant local planning authority prior to operation and secured as a certified document within each Development Consent Order.	communications procedures for the Norwich to Tilbury Project are committed to within **7.2 Outline Code of Construction Practice [Revision E]** and not the Protocol. 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. 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. 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 turbines[7], 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 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.

4.3 Agenda Item 5 (Aviation Safety)

Table 4.2 Item 5 (Aviation Safety)

Item No.	Third Party Comment	Applicant's Response
5.1 Aviation Discussion		
5.1 Policy matters		
5.1a	General Aviation Awareness Council **[REP4-361]** The GAAC does not dispute the critical national priority status of this scheme. However, EN-1 specifically addresses human safety and aviation and we do dispute the Applicant's interpretation of those safety issues within it. The key statements are set out in various paragraphs in EN-1. Despite EN-1 para 5.5.5 requiring collaborative development, the initial National Grid route made no reference to aviation or aerodromes. The presence and nature of aerodromes along the route was not taken into account for the first two years of the project being in the public domain. It is clear that the presence of aerodromes was not a consideration in route planning. The Applicant's position is that, effectively, safeguarding of an unlicenced aerodrome is immaterial. However, EN-1 includes all aerodromes. The Applicant has wrongly sought to differentiate between licensed and unlicenced. There has been a superficial and wholly inadequate assessment of the likelihood of accidents but experienced aviators and those with responsibility for aviation safety	The Applicant's position in relation to NPS EN-1 (2024) policy requirements regarding exemptions to the critical national priority presumptions related to human health and public safety (paragraph 4.1.7) is clarified within the response to SS 2.5 in **8.9.2 Applicant's Response to Second Written Questions [Revision A]**. It was previously described within **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** (pages 34 to 37) and **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** (Item number 5.1b pages 9 to 12). These submissions conclude there is no human health or public safety implication arising from impacts on general aviation aerodromes as no unacceptable risks following mitigation are assessed. The Applicant has not promoted the closure of any general aviation aerodrome. The Applicant has not sought to argue that EN-1 applies only to licensed aerodromes. The Applicant's response to the **General Aviation Awareness Council Written Representation [REP2-050]** within **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** provides an account of the Applicant's accordance with EN-1 in relation to unlicensed general aviation aerodromes (see pages 160 to 163 and 174 to 175). This response also describes the Applicant's early stage consideration of aviation impacts and implementation of significant design changes justified by assessed impacts on general aviation aerodromes (page 154), assessment of

[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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	conclude that this assessment seriously underestimates this risk and its severity. There should have been a tailored appraisal taking account of the nature of the flying activity, topography and context. The CAA letter of March 20 2025 set this out clearly. The Applicant emphasised 'Public Safety' in the Hearing. However, EN-1 does not address 'Public Safety', it addresses 'Human Safety'. There seems to be an attempt to suggest that General Aviation aerodromes are small, insignificant and irrelevant and that if pilots and trainee pilots wish to use them they do so at their own risk. That is a misrepresentation. In order to meet EN-1 tests, the Applicant should re-engage and reappraise the aviation safety risks set out by the aerodrome operators and the scheme should be modified to minimise the risks as required by EN-1.	variable and site-specific aviation impact factors (page 155), socio-economic impacts (pages 155 to 160) and accordance with the National Planning Policy Framework[8] (page 166 to 167). **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]** (pages 34 to 37) explains the differing safeguarding systems between licensed and unlicensed civil aerodromes, and their differing related importance in national policy terms, however, and **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** explains that Secretary of State decision making will be applied on this basis (see page 11). The Applicant's response to question SS 2.3 in **8.9.2 Applicant's Response to Second Written Questions [Revision A]** provides a comprehensive rebuttal of the GAAC's assertions in relation to consideration of aviation impacts within early route development and in response to stakeholder feedback, as well as with regards to the Applicant's site-specific impact assessment approach, aligned with the advice of the Civil Aviation Authority Airfields Advisory Team (CAA AAT), and inclusion of mitigation measures as an integral part of the Project.
5.1b	Norfolk Gliding Club **[REP4-366]** We believe the project is in planning policy matters contrary to the guidelines of EN-1 section 5.5, contrary to the guidelines of EN-1 para 4.2.15, contrary to the guidelines of the NPPF para 200.Is in aviation guidance matters, contrary to the guidelines provided by the CAA and their Airfield Advisory Team, the Combined Aerodrome Safeguarding Team (CAST) and the General Aviation Awareness Council (GAAC) and contrary to the guidelines provided by the BGA, contrary to the conclusions in Dr Mark Eddowes' report. There was no attempt at collaboration (ref EN-1 paras 5.5.2 and 5.5.5) prior to the proposed route being published in 2022. EN-1 para 5.5.15 makes it clear that safeguarding applies to both licensed and unlicensed aerodromes. We understand that the North Humber to High Marnham NG route evaluation is being undertaken in line with the principles set out by the CAA AAT and the CAA CAST and the Aerodrome Operators involved.	As per our response to the Respondent's REP4-365 within **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [Revision A]**, we note that matters raised have been addressed within the Applicant's submissions to date, which include: • **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). • **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** (response to SS 1.8 at pages 613 to 618 refers 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). • **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** (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); Action 7 (pages 9 to 10) detail National Grid's operation procedures for drone-flying to maintain overhead lines, responding to relevant regulation and guidance. • Furthermore, the Applicant's response to SS 2.3 in **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. 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

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		aerodrome, despite the operator position only more extreme mitigation measures would be acceptable (see SS 2.7). The Applicant considers it inappropriate for the Respondent to propose an alternative methodology when the Applicant's approach on this Project is in accordance with national policy and Civil Aviation Authority (CAA) guidance, as well as consistent with the high-level principles described by the CAA AAT (see Paragraph 15.3.15 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [REP4-161]** and Matters 7.1 and 7.3 of **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP4-249]**. The Applicant continues to seek meaningful operator engagement in its ongoing consideration of gliding-specific assessment parameters and reasonable mitigation measures (further informed by engagement with the British Gliding Association – see **8.3.89 Draft Statement of Common Ground – British Gliding Association [Revision B]**) rather than the operator rejecting assessments without providing evidence to justify its general position that the Project is not acceptable.
5.1c	Raydon Wings Aerodrome (RWA) **[REP4-370]** At the outset of this project, the Applicant did not consider General Aviation (GA) and the potential safety impacts of routing its graduated swathe close to established GA aerodromes, principally because it did not undertake sufficient pre-design research that would have identified the existence of aerodromes lying within or close to the graduated swathe. We say that this amounted to a lack of basic diligence and a failure to follow planning policy The CAA repeatedly advised the Applicant of the necessity of engaging with affected aerodromes to identify and mitigate likely impacts. Despite the clear guidance contained in NPS EN1, the advice of the CAA and the contents of other national planning policy and guidance, at no point has the Applicant engaged with us with the aim of understanding and proactively mitigating the effects of its proposals on RWA. On 20 March 2025, the CAA wrote to the Applicant in respect of safeguarding at unlicensed aerodromes setting out various key points and concerns. It ruled that, "It should not be assumed that such aerodromes have not already achieved adequate levels of safeguarding or that any changes to their environment caused by development, will not adversely impact their operation. "The common aim of all safeguarding is to assess the implications of any development being proposed within the vicinity of an established aerodrome to ensure, as far as practicable, that the aerodrome and its surrounding airspace is not adversely impacted by the proposal, thus ensuring the continued safety of aircraft operating at the location". Unlicensed aerodromes require the same application of safeguarding logic as do licensed aerodromes. In its letter of 20 March 2025, the CAA also specifically expressed its concerns regarding the effect of the Applicant's proposals on RWA. Despite this warning, the Applicant made no attempt to engage with RWA in order to mitigate the impacts of its proposals. The only practical difference between a licensed aerodrome and an unlicensed aerodrome is that at a licensed aerodrome the CAA has oversight of safeguarding and issues an aerodrome licence which certifies that the aerodrome concerned meets ICAO Annexe 14 conditions. Somewhat ironically, the issue of safeguarding is now the one point upon which both RWA and the Applicant now agree. In the draft SoCG it is agreed between RWA and the Applicant that the same OLS slopes that apply to licensed aerodromes should be applied at unlicensed aerodromes. For the Applicant, at ISH2, ASA stated that the occurrence of engine failure in piston light aircraft was around 1 in 10 million flight hours (which was presented to ISH2 as being one in ten to the power of seven). The US FAA NTSB database (the largest and	**8.9.2 Applicant's Response to Second Written Questions [Revision A]** provides a comprehensive response to the operator's various assertions in relation to the Applicant's consideration of aviation impacts within EIA scoping, early route development and in relation to the implementation of design changes (with particular regard to the siting of the Cable Sealing End (CSE) compound) (see SS 2.3). Previous relevant submission include the Applicant's position within Matter 7.2 (Corridor and Preliminary Routeing and Siting) of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]** and **8.8.1 Applicant's Comments on Written Representation [REP2-209]** (page 264 to 266, responding to **Raydon Wings Aerodrome Written Representation [REP1-256]**) describe the reasonable and responsible approach taken to consideration of aviation impacts during the early stages of the Project's development, including the preferred corridor graduated swathe. Both documents detail the Applicant's consultation and engagement with the aerodrome operator since 2022, in accordance with paragraph 5.5.39 of NPS EN-1 (2024) and in compliance with legislative requirements under the Planning Act 2008. Paragraphs 3.17.7 to 3.17.9 of **8.8.2 Applicant's Comment on Local Impact Reports [REP2-030]** provide the Applicant's position in relation to our engagement with, and feedback received from, the Civil Aviation Authority Airfields Advisory Team (CAA AAT) regarding Raydon Wings. This position acknowledges AAT concerns regarding vertical clearance of the Cable Sealing End (CSE) compound but notes no advice is given on clearances to be achieved. Furthermore, the position makes clear Obstacle Limitation Surfaces (OLS - agreed with the Operator to be applicable to the unlicensed aerodrome) are not infringed by the CSE compound. The Applicant engaged with the CAA AAT from August 2023 until the body's disbandment in March 2025. To reiterate, the Applicant has not received feedback from the CAA, nor directly engaged with the CAA's Combined Aerodrome Safeguarding Team (CAST) (our response to GEN 1.20 within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** refers). In our response to Action 09 (pages 13 to 15) within **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**, the Applicant explains the Project design development rationale, including significant changes made in response to both Operator feedback and aviation impact assessments to minimise adverse impacts on operations at Raydon Wings, in accordance with paragraph 5.5.50 of EN-1 (2024). Following the implementation of these changes (within the 2024 draft alignment), we describe our continued engagement with the Operator to understand residual concerns, with repeated requests for information to justify further design changes. The Applicant's position within Matters 7.5 and 7.6 within **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]** recognise this has included repeated requests for clarity on the Operator's commitments in terms of future operational proposals to ensure these are appropriately considered within impact assessments. This information has not been forthcoming. The Applicant position remains that it is unable to implement design changes which are not justified in policy or by evidence of risk. **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** and **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]** describe the Applicant's

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	most authoritative database in the world) suggests that the failure rate for piston engined aircraft is actually around 1 in 3200 flight hours. General aviation aerodrome operators and aerodromes are well aware of this statistic, but the fact that the Applicant's expert has this critical likelihood of engine failure so fundamentally wrong must cast doubt upon the validity of its safety assessments as they will, presumably, have been predicated on an engine failure rate of 1 in 10 million as opposed to 1 in 3,200 flight hours, but may be as high as 1 on 10,000 in some well-maintained and low workload systems (or ten to the power of 4) The Applicant presented a hierarchy of aerodromes with licensed and officially safeguarded aerodromes being of most value and unlicensed aerodromes having less. We say that the Applicant has entirely failed to adequately follow both the letter and the spirit of NPS EN1 and other national policy protecting General Aviation and the amenity it provides in its various forms.	ongoing efforts to progress discussion of residual impact mitigation measures, including consideration of Project construction practices and the potential for the Operator to implement reasonable changes to aerodrome operational procedures such as current aerobatic activities, in accordance with paragraph 5.5.50 of EN-1 (2024). **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] (pages** 8 and 9) explains the Applicant's source of statistics for engine failure as a verifiable Australian data source, in comparison to the operator's alternative figure, of which the veracity has not been confirmed. The Applicant's response to SS 2.5 in **8.9.2 Applicant's Response to Second Written Questions [Revision A]** clarifies the Applicant position in relation to public safety as relevant to the application of the CNP policy within NPS EN-1 (2024)

4.4 Agenda Item 6 (The Development Consent Order)

Table 4.3 Item 6 (The Development Consent Order)

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6.1 Articles and Schedules of the draft DCO		
6.1a	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] The Council points out that the experience of delivering the Bramford to Twinstead project has not been without concern on our side about the quality of submissions from National Grid. We are also asking that the Applicant and the ExA consider the imposition of requiring a certain standard of submission at discharge of requirement.	The Applicant set out its position in full on page 17 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** submitted at Deadline 4 in which it confirmed its agreement to a validation checklist (or similar) and requested drafting is proposed by the host authorities for consideration by the Applicant.
6.1b	Essex County Council [**REP4-328**] Regarding Requirement 8, ECC raises concerns about the impact on local authority resources and workloads of deemed consent and discharge provisions, particularly bearing in mind the cumulative impact of other NSIPs. ECC has referred to these concerns in our submissions on the appropriate ECC wishes to bring to the attention of the ExA its support for the suggestion wording proposed by Braintree District Council.	Please refer to the Applicant's submissions on page 17 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** submitted at Deadline 4 in which it confirmed its agreement to a validation checklist (or similar) and requested drafting is proposed by the host authorities for consideration by the Applicant. The Applicant has previously confirmed that it intends to enter into post-consent planning performance agreements to help manage the discharge of requirements process and fund supporting resourcing for host authorities.
6.1c	Norfolk County Council **[REP4-332]** The Council welcomes the Applicant's introducing a new definition for 'relevant county planning authority' and understand why the definition of 'relevant planning authority' has been amended but not replaced with 'relevant district planning authority'. We also consider the Applicant's removal of the term 'discharging authority' from schedules 3 and 4 is helpful.	Noted.
6.1d	Suffolk County Council [**REP4-336**] The Council raises concerns regarding the inclusion of both deemed consent provisions and wording requiring that consent is not "unreasonably withheld or delayed", considering this duplication unnecessary and likely to introduce ambiguity. SCC supports removal of this wording, aligning with recommendations from other examinations where similar provisions have been criticised.	The Applicant addressed this point fully on page 21 of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and maintains its position that for some applications it would be more reasonable for an approving authority to decide within a period shorter than the maximum period to which deemed approval relates. Furthermore, the inclusion of 'unreasonably withheld' simply reflects what the authorities say they undertake in practice and so should not be contentious. The Applicant maintains that there is no public disbenefit to including both deemed consent and that consent must not be unreasonably withheld or delayed.

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	SCC considers that, where a sufficient decision period is provided, deemed consent alone is appropriate and additional wording is unjustified. Reference is made to experience from other projects, where inclusion of both provisions has not operated effectively in practice. SCC requests deletion of the "unreasonably withheld or delayed" wording across multiple articles of the draft DCO to ensure clarity, consistency and effective operation of the consenting process	
6.1e	National Highways (NH) [**REP4-343**] In relation to Article 13 (Application of the 1991 Act), NH object to the automatic disapplication of the provisions on the 1991 Act as listed in Article 13. The Applicant should be required to obtain NH's consent in the event that the activities affect the Strategic Road Network or any land NH has an interest in. The DCO includes several articles which grant the Applicant powers over the SRN. This could have significant safety implications if not properly and proportionately controlled through protective provisions which require NH's approval before these powers are exercised. NH is in the process of agreeing protective provisions with the Applicant. NH will continue discussions and will update the ExA on the further changes required at future deadlines if agreement is not reached. Post hearing note:- the position above applies to NH's objections in relation to Articles 11, 12, 14, 16, 17, 18, 20, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 47, 49 and 50. It is noted that prior approval is already agreed in relation to Articles 16, 20, 21 and 22 in the PP's appended at Schedule 16 Part 4 paragraph 7(3) [**REP3-004**]. NH is keen to use its own standard PP's rather than the PP's appended at Schedule 16 Part 4 of the dDCO. The latest updates in relation to Article 55 do not address NH's concerns regarding refunds for matters outside its control. Additionally, NH object to deemed consent (across multiple articles).	The Applicant has responded on the matter of deemed consents in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** and in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant is continuing to engage with National Highways on its protective provisions. Article 55: The Applicant has previously addressed the matter of refunds of fees in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**.
6.1f	National Farmers Union (NFU) [**REP4-421]** Article 5- Limits of Deviation: - The NFU is requesting that the depth between the protective tile to the top of the finished ground level is 1.2m and the depth should only be as shallow as 0.9metres for exceptional engineering reasons.	The Applicant addressed this point on page 18 of **8.5.8 Applicant's Response to Issue Specific 2 Action Points [REP4-303]** and maintains its position that 0.9 m is the minimum depth of cover to protective tiles within agricultural land. Cables can be installed deeper where constraints occur such as at utility crossings and under watercourses and ditches. The overall depth of the cable is determined at detailed design as depth impacts the cable rating (capacity) of the cables and needs to be designed at a system level once all constraints are confirmed. Downward limits are imposed by the technical cable system detailed design and are therefore not provided.
6.1g	National Farmers Union (NFU) [**REP4-421]** Article 22 – Authority to survey and investigate land - The NFU would like further clarity on what land may be '**any land which may be affected by the authorised project**'. The NFU believes that this is too wide an area and that this needs to be tighter so that landowners and occupiers will have an idea as to what land might be impacted. The NFU would like to request that the word 'adjacent' should be included in the wording at 22.1 and that there should be a definition of adjacent included in the DCO. The NFU raised at 22 (1) (b) that the wording also included not just land but any buildings as well. 'Buildings' is not normally included and the NFU requested why was it necessary to include buildings. The NFU raised at 22 (1) (d) that the wording included 'monitoring land'. The NFU raised that if equipment is left to carry out monitoring this can cause interference to day to day agricultural operations.	The Applicant addressed this point on page 26 of **8.5.7 Applicant's Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** in which it confirmed that the provision as it stands in **3.1 Draft Development Consent Order [Revision E]** is a precautionary power common to DCOs, necessary because National Grid going on to land not affected by the authorised development (the standard built-in constraint to that power) would otherwise be outside its powers, and it would be acting ultra vires. For example, such land affected by the authorised development might include land outside the Order Limits, in respect of which noise, dust or traffic monitoring needs to be carried out. Under Article 22(7), the Applicant must compensate the owners and occupiers of the land for any loss or damage arising by reason of the exercise of the powers conferred by this article.

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6.1h	National Farmers Union (NFU) [**REP4-421]** Article 27 – Temporary Use of Land - The NFU would like to see this notice period being for three months before entering and using the land. The notice period of 14 days is simply not enough time for a farming business to plan changes to operations/cultivations or make arrangements to do something different on an area of land.	The Applicant addressed this point on page 18 of **8.5.8 Applicant's Response to Issue Specific 2 Action Points [REP4-303]** in which it noted that 10 business days is a minimum requirement and is the business day equivalent of the 14 days' notice period that was considered to be appropriate in the equivalent provision on The National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant will continue to engage with landowners and, where it is in a position to do so, the Applicant will seek to provide notice in excess of the minimum period. The Applicant is required by Article 29(6) to pay compensation to affected landowners and occupiers for loss or damage arising from these powers of temporary use of land for maintaining the authorised development. In the context of this project of critical national priority, the Applicant does not consider three months' notice to be proportionate.
6.2 Schedule 3 (Requirements) and Schedule 4 (Discharge of requirements) of the draft DCO		
6.2a	National Highways (NH) [**REP4-343**] In relation to Requirement 4 (Construction Management Plans), in addition to the approval of the LPA, NH approval sought be consulted where any amendments to documents, details or schemes affect the SRN or land NH has an interest in. For any variation to the approved documents and plans, NH must ensure that changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. It is noted that the "relevant highway authority in the case of the construction traffic management plan" has been added to the draft requirement. On Requirement 4(2) National Highways would wish to be consulted on any departures from the CTMP and in relation 1(4) in the interpretation section of the Requirements Schedule which deals with "unless otherwise agreed" this should require consultation with the relevant highway authority. In any event, the amendment made by the Applicant to note that the relevant highway authority should be consulted on the CTMP does not fully address NH's concerns. NH require to be consulted upon the CoCP, CTMP, LEMP and PROWMP.	Requirement 4: The Applicant updated **3.1 Draft Development Consent Order [REP4-038]** at Deadline 4 to include the relevant highway authority (which includes National Highways) as a consultee for all of the management plans '*where relevant in the context of the operation of the local and strategic road network*'. Whilst the Applicant notes that there will be some interaction with land within which National Highways has, or will have, an interest for the purposes of its Lower Thames Crossing project (which may include mitigation areas), discussions with the Lower Thames Crossing project team are ongoing to ensure that such interactions are adequately dealt with by agreement. Therefore, the Applicant does not currently propose any amendments to consult National Highways more widely than in relation to matters relevant to the operation of the strategic road network. The revised Requirement 4 in **3.1 Draft Development Consent Order [Revision E]** submitted at Deadline 5 also allows for consultation with the relevant highway authority. This would occur, where relevant in the context of the operation of the local and strategic road network, in the event that the Applicant seeks agreement from the relevant planning authority to depart from the relevant plan under paragraphs (3) and (4). Furthermore, in relation to compliance with the CTMP, section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision D]** sets out how the Main Works Contractor / National Grid will involve National Highways in the event of a non-compliance (departure). In addition, and in relation to consultation in general, **7.3 Outline Construction Traffic Management Plan [Revision D]** includes a commitment that National Grid will engage with Forums set up and managed by Local Highway Authorities or National Highways, where appropriate.
6.2b	National Highways (NH) [**REP4-343**] There are several Requirements included in Schedule 3 of the dDCO which NH has an interest and would expect to be consulted on. There are strict timescales for condition approvals depending on whether there is a named consultee, so any required consultation needs to be specified. In relation to Requirement 7 (construction hours), 8 (retention and removal of trees, woodland and hedgerow), 9 (Re-instatement planting plan) and 10 (Re-instatement schemes) it is noted that the latest version of the dDCO April 2026 [**REP3-004**] do not address NH's concerns. In relation to Requirements 7, 8 9 and 10, NH require to be consulted where works affect the SRN or relate to land NH have an interest in. This is not unreasonable. NH must have control over the operations being carried out on its network.	The Applicant has updated **3.1 Draft DCO (Revision D) [REP4-037]** to include National Highways as a named consultee for the construction management plans (Requirement 4) insofar as these relate to the operation of the strategic road network. The Applicant notes National Highways' request to be identified as a named consultee for Requirements 7 (construction hours), 8 (retention and removal of trees, woodland and hedgerow), 9 (re-instatement planting plan) and 10 (re-instatement schemes), however the Applicant does not consider it necessary to amend the draft DCO to identify National Highways as a named consultee for these requirements. Schedule 4 of **3.1 Draft DCO (Revision D) [REP4-037]** expressly provides a mechanism through which the relevant authority may seek input from other parties where it considers such consultation necessary.
6.2c	Norfolk County Council (NCC) [**REP4-332**] Schedule 3: Additional requirements: NCC has requested an employment and skills plan to be secured through a requirement of the DCO. NCC also requested a requirement to secure a construction surface water management plan. The Applicant has indicated that the Outline Code of Construction Practice [**REP2-014**] secures that the main works contractor will produce a surface water management	The Applicant confirms that **8.13 Employment and Skills Plan (Revision A)** has been submitted at Deadline 5. The commitment within **7.2 Outline Code of Construction Practice [Revision E]** that secures the production of a surface water management plan by the Main Works Contractor (GG22) includes the following text: '*Construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs) and statutory undertakers including Anglian Water (where relevant), with ongoing*

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	plan to be in substantially in accordance with the drainage strategy [**REP1-072**]. NCC would seek for the construction surface water management plan to either be the subject of its own requirement or to be listed as a 'relevant plan' under requirement 4 (construction management plans).	*dialogue during implementation of the measures',* thereby providing for the consultation that is sought by NCC.
6.2d	Norfolk County Council (NCC) [**REP4-332**], Suffolk County Council [REP4-336] Schedule 4: Time periods for discharge of requirements These Councils all raise concerns about the short time periods for the discharge of requirements and note where timescales do not allow for sufficient review of the submitted information, a discharging authority may be forced to issue a refusal (to preserve their position), thus leading to the possibility of an appeal. The Councils suggest a 56-day period (i.e. 40 business day period), which aligns with the eight-week statutory time limits for applications made to discharge a planning condition under The Town and Country Planning (Development Management Procedure) (England) Order 2015. Longer periods are well precedented for other DCO projects. The Council's are broadly supportive of the use of business days rather than calendar days.	Schedule 4: The Applicant has responded fully on the number of days for discharge of requirements on page 23 of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and on page 16 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** and maintains its position that a blanket decision period of 56 days is not necessary or justified and instead considers that 25 business days, which is the business day equivalent of the 25 days that the Examining Authority found to be necessary, reasonable and proportionate in The National Grid (Bramford to Twinstead Reinforcement) Order 2024, is appropriate and proportionate. The Applicant notes the Council's position on the use of business days and further notes that it made this amendment to accommodate the requests of several host authorities.
6.2e	Suffolk County Council [**REP4-336**] Concerns are also raised regarding the discharge process more generally, including: • The need for clearer and more consistent provisions allowing conditions to be attached to consents • Lack of certainty in drafting where some provisions allow conditions and others remain silent • The importance of ensuring sufficient flexibility for authorities in managing large volumes of approvals. SCC also highlights practical challenges experienced on other projects, including insufficient time to review submissions, lack of coordinated documentation, and inefficiencies arising from incomplete or poorly timed submissions. These issues support the case for extended timeframes and improved clarity in the discharge process.	The Applicant response: • Clearer and more consistent provisions allowing conditions to be attached to consents: Please refer to pages 407 and 525 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** where the Applicant responds to this point. • Ensuring sufficient flexibility for authorities managing large volumes of approvals: The Applicant's position is that flexibility for decision makers is already factored into the relevant provisions. There are opportunities for the relevant planning authorities to seek further information and extensions of time. In the event that the applications are unsuitable in quality, the relevant authorities could reject the discharge application if extra time were not agreed. The Applicant is committed to meaningful ongoing engagement with the relevant authorities, which it proposes will include sharing and discussing draft submissions before a formal discharge submission is made. • Effective working practices: The Applicant agrees that it is important to have effective working practices in place and refers to it submissions on page 17 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** submitted at Deadline 4 in which it confirmed its agreement to a validation checklist (or similar) and requested drafting is proposed by the host authorities for consideration by the Applicant. The Applicant further confirmed in that response that as part of consulting with host authorities to discuss ways of working for discharge of requirements, has proposed to fund independent resource appointed by the host authorities to assist as the authorities see fit to reduce the resource burden of this project. The Applicant has previously confirmed that it intends to enter into post-consent planning performance agreements to help manage the discharge of the requirements process. The Applicant's position regarding time periods for discharge remains unchanged. Please refer to **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]** where this is set out in detail.

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6.2f	Suffolk County Council [**REP4-336**] Further concerns include the proposed disapplication of section 23 of the Land Drainage Act 1991, which SCC does not agree to, and the associated reduction in determination periods for drainage matters, which is considered unreasonable.	Disapplication of Land Drainage Act 1991: The Applicant notes Suffolk County Council's position on the disapplication of section 23 of the Land Drainage Act 1991 and continues to seek agreement on protective provisions with the relevant drainage and flood authorities.
6.2g	National Highways [**REP4-343**] NH's position is that it supports the submissions made by the Local Authorities that a longer determination period for discharge of requirements is required. 25 working days is not acceptable. In addition, and in relation to Schedule 4: Discharge of Requirements, Paragraph 2, provides that 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. Paragraph 2 (2) provides, "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 business days of receipt of the application, notify the undertaker in writing specifying the further information required" and paragraph 2 (3) provides "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." NH's position is that were it to be required to be consulted, 5 days is not enough time for NH to respond.	The Applicant has responded fully on the number of days for discharge of requirements on page 23 of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and on page 16 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** and maintains its position that a blanket decision period of 56 days is not necessary or justified and instead considers that 25 business days, which is the business day equivalent of the 25 days that the Examining Authority found to be necessary, reasonable and proportionate in The National Grid (Bramford to Twinstead Reinforcement) Order 2024, is appropriate and proportionate. Further information: The interim timescales in Requirement 2(3) are imposed on the relevant authority, not the consultee. Any request for further information from a consultee must be notified to the Applicant within 15 business days of the date of the application. The Applicant has updated **3.1 Draft Development Consent Order [Revision E]** such that applications for discharge of requirements will go to consultees at the same time as they go to the relevant planning authority to streamline the process and has retained the overall 15 business day timescale.
6.3 Article 60 and Schedule 19 of the draft DCO – Certification of plans		
	No comments were submitted under this heading.	
6.4 Consents, licences and other agreements		
	No comments were submitted under this heading.	

4.5 Comments on the Oral Cases from ISH2 (29 April 2026)

4.6 Agenda Item 8 (Landscape and Visual Effects)

Table 4.4 Item 8 (Landscape and Visual Effects)

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8.1 Methodology		
8.1a	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] The local authorities have seen the first draft of this document from National Grid very recently, and we have shared initial thoughts, but we haven't yet had a chance to have a look at the detail, and we certainly haven't had a chance yet to speak to the Hinckley authorities about their experience. So, it's very early stages and I would be cautious of relying too much on that as a solution.	The Applicant considers that this matter relates to its approach to agreeing ways of working with host authorities for the discharge of requirements. At ISH2, the Applicant explained that a document is being developed to set out the background to this approach, providing a standard framework for establishing how parties would work together from the pre-application stage onwards. This type of document is typically prepared and progressed in the background.

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		The Applicant indicated at that hearing that, should the Examining Authority find it helpful, an example or draft could be provided. Since ISH2, the Applicant has received comments from host authorities on the emerging document and is currently reviewing these with a view to further developing it. However, the Applicant does not propose to submit the document into the Examination at this stage, as it remains a work in progress. It may be appropriate to consider submission of such a document at a later stage once it has been further refined.
8.1b	Braintree District Council [**REP4-323**] The Applicant was asked by the Examining Authority to confirm the methodology used in undertaking the Residential Visual Amenity Assessment (RVAA). The Applicant confirmed that assessments were undertaken from the nearest publicly accessible locations, and that individual residential properties were not visited. The Council has concerns that this approach does not fully align with Landscape Institute Technical Guidance Note 2/19 (Residential Visual Amenity Assessment), which states that "where access to private property cannot be obtained, and having employed best endeavours to do so, assessment may then be undertaken from appropriate publicly accessible locations" (Paragraph 4.21). The Applicant has not demonstrated that such best endeavours were undertaken in this case. The Council has previously identified potential breaches of residential visual amenity at E7 West Ford Farm Cottage and E8 Whiteheads Farm. These properties were specifically identified for detailed consideration within the RVAA, yet it appears that no property-level assessment has been carried out. In the absence of direct assessment from within the residential curtilage, there remains uncertainty as to the magnitude of effects, particularly when the Limits of Deviation are taken into account.	Due to the scale and nature of the Project, it was considered highly unlikely that access would be granted to each of the individual properties assessed within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP4-148 to REP4-157]** within Project timescales, and that without the same level of access to all properties, the assessment would be inconsistent. Therefore, as an alternative, and to ensure consistency across the report, use was made of all available data detailed in paragraph 13.2.12 of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 [REP4-148]**, with fieldwork used to verify this information where necessary.
8.1c	Essex County Council [**REP4-328**] ECC reiterates the need for further clarity as to the Applicant's approach to assessing and providing visualisations for 'worst case' impacts based on the limits of deviation. Whilst ECC acknowledge the Applicant's point that they do not rely on the visualisations to form professional judgements, ECC maintains that further visualisations which do show a reasonable worst case scenario based on the limits of deviation should be provided. ECC therefore wishes to reiterate its request for further visualisations to be provided in order for the ExA to satisfy itself that (i) the judgments reached by the Applicant following sensitivity testing are reasonable and appropriate and that (ii) the reasonable worst case impacts have been assessed, particularly in respect of heritage assets but potentially some sensitive viewpoints as well. ECC has identified with the Applicant a number of locations where it would like to see additional visualisations of worst-case scenarios and remains in discussion with the Applicant on this matter.	The Applicant sets out its position in response to this matter under ISH2 Action Point 25 in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [Revision A]**. In summary, the Applicant has provided LoD visualisations from a selection of viewpoints which were requested by local authorities and these are provided in **8.4.12.1 Response to ISH2 Action Point 25 - LoD Visualisations**. The Applicant has reviewed the LoD visualisations and it is considered that the judgements in Section 13.9 Sensitivity Testing of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** remain fair and reasonable.

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8.1d	Suffolk County Council [**REP4-336**] Considers that the methodology, particularly regarding landscape value, underplays the value of the Suffolk Landscapes the scheme is traversing. The assessment fails to recognise that non-designated areas can still be of value and valued. It further fails to recognise that some areas, such as the Waveney Valley, used to be designated as Special Landscape Areas, for their value to wildlife and landscape, before this policy was removed from the Local Plans post-2014. Further details on methodology and the presentation of the assessment can be found in the LIR [**REP1-178**] and its Annex C [**REP1-178**]."	The Applicant sets out its position with regard to designated landscapes and landscape value in response to LV 1.19 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant also provided a response on this matter under ID 13.93, Table 4.20 on pages 470 to 471 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant agrees that all landscape is of value, as recognised by the European Landscape Convention. The Applicant has taken a systematic and consistent approach to identifying the value of the landscape. It is considered that the judgements made remain fair and reasonable and that they do not underplay the value of the Suffolk landscape.
8.2 Landscape and visual effects – general issues, including limits of deviation (LoD)		
8.2a	Norfolk County Council [**REP4-332**] The Council has reviewed paragraph 3.2.28 of ES Chapter 3 [**APP-127**], which describes the flexibility provided through Limits of Deviation (LoD). NCC's concern is that there is considerable variation to the amount of harm done to, for example, veteran trees and ancient woodlands within the lateral limits. The decision-making between alternatives within the LoD is obscure. Despite the acknowledgement in the design development report that the options trade off harms against particular veteran trees, there is no explicit evaluation of these harms in a readily comparable way.	The Applicant has provided a list of alternative scenarios within **6.4 Environmental Statement Chapter 4 – Project Description [APP-130]** where alignments and impacts to significant receptors, including veteran trees has been tested. Arboricultural impacts have been assessed project-wide on a reasonable worst case scenario, with commitments provided within **7.2 Outline Code of Construction Practice [Revision E]** to reduce impacts to trees through mitigation, protection and supervision. It is anticipated that, through detailed design, further commitment to reducing tree loss and refining working areas will provide opportunities to ensure that potential impacts are minimised to veteran trees within the current Limits of Deviation.
8.2b	Suffolk County Council [**REP4-336**] The Council considers that the proposed scheme would result in widespread and long-term adverse landscape and visual effects, particularly in rural areas where overhead infrastructure is not currently a defining feature. The assessment is considered to underrepresent the sensitivity and value of Suffolk's landscapes, including non-designated areas. SCC emphasises that the mitigation hierarchy has not been fully applied, with insufficient consideration given to avoidance and reduction of impacts before relying on mitigation and limited compensation. It considers that compensatory measures should be provided where proportionate, including for cumulative and residual effects, and that these should contribute to landscape restoration or enhancement. Concerns are raised regarding the assessment of Limits of Deviation, with SCC not satisfied that a realistic worst-case scenario has been properly assessed. There is potential for materially greater impacts where pylons are located closer to sensitive receptors, even if the overall significance category remains unchanged. SCC therefore requests additional visualisations showing worst-case positions and greater control over micro-siting. SCC considers that while flexibility in alignment may be necessary, deviations from the assessed route should be subject to agreement with the relevant planning authority to ensure that adverse effects are not exacerbated. Overall, SCC is concerned that insufficient control and assessment of deviation could lead to greater real-world impacts than those presented in the Environmental Statement.	The Applicant has identified significant adverse effects on landscape and visual receptors up to a distance of approximately 1.5 km from the Project, and extending up to 2 km from some more elevated viewpoints. The Applicant does not consider effects to be widespread as noted in Table 4.20 on page 464 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant sets out its position with regard to designated landscapes and landscape value in response to LV 1.19 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant also provided a response on this matter under ID 13.93 on pages 470 to 471 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant has undertaken a systematic and consistent approach to identifying the value of the landscape. It is considered that the judgements made remain fair and reasonable and that they do not underplay the sensitivity and value of the Suffolk landscape. The Applicant sets out its position with regard to the mitigation hierarchy in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant considers that the mitigation hierarchy was systematically applied throughout the design of the Project. The Applicant sets out its position with regard to the assessment of LoD in Section 8.2a of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has engaged with Suffolk County Council over additional visualisations which illustrate the LoD and these are provided in **8.4.12.1 Response to ISH2 Action Point 25 – LoD Visualisations [Revision A]**. The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation within the Waveney Valley, Gipping Valley and around Bramford Substation as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of National Grid or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.

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8.2c	T Fairley and Sons [**REP4-375**] The citing of the EACN and the connections the Applicant has prematurely granted to North Falls and Five Estuaries, results in a disproportionate burden on a small number of landowners, the Little Bromley and Ardleigh community, and the character of this landscape. The Applicant clearly accepts that the substations will cause significant harm to the area given the scale of landscaping and environmental mitigation proposed. Yet they fail to recognise that in this circumstance, policy requires avoidance first. EN1 and EN5 require applicants to avoid BMV land, which is defined as Grades 1, 2 and 3a, wherever possible. If the Applicant had appropriately assessed the citing and routing of their Project against EN1, EN5 or the Holford Rules they would not have identified a site for the EACN that is directly in the middle of the largest contiguous block of grade 1 land in the county.	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities/operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. As set out in **5.6 Planning Statement [APP-085]**, the Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource and on agricultural activities (as set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**). It is nonetheless noted that routeing and siting decisions about the East Anglia Connection Node (EACN) substation were taken in light of a wide range of factors influencing both the site of the EACN substation (factoring in the potential for co-location of the North Falls and Five Estuaries substations) and the effects of the 400 kV connections to the EACN substation as well as the customer cable corridors from the offshore generation site to potentially co-located substations. Paragraph 5.11.12 of NPS EN-1 sets out that '*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*'. Given the predominance of BMV agricultural land within East Anglia and the geographical extent and scale of the Project, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for critical national priority Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.
8.3 Consideration of specific areas – Waveney Valley		
8.3a	Norfolk County Council [**REP4-332**] The Council maintains its position that additional compensation and landscape-led restoration measures are required for the Waveney Valley. It emphasises that the mitigation hierarchy must be fully applied, including the requirement to compensate residual adverse impacts as far as possible, in line with national policy. Overall, NCC concludes that the scale of impacts in the Waveney Valley necessitates compensation beyond standard mitigation measures, including landscape restoration initiatives, to address the identified harm.	The Applicant sets out its position with regard to the mitigation hierarchy in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant considers that the mitigation hierarchy was systematically applied throughout the design of the Project. The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has, however, provided details of potential opportunities for landscape compensation within the Waveney Valley as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of National Grid or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.3b	Suffolk County Council [**REP4-336**] The Council raises a range of concerns across specific landscape areas, emphasising that effects are often underestimated and that further mitigation, design refinement or compensation is required. In the Waveney Valley, SCC considers the landscape highly sensitive and notes that the Applicant has moved away from undergrounding despite previously recognising its value. The Council is disappointed that no comprehensive compensation has been proposed and considers that impacts—particularly on views and heritage settings—are likely to be significant and long-term.	The Applicant has identified significant adverse effects on landscape receptors up to a distance of approximately 1.5 km from the Project. The Applicant has provided a response on specific landscape areas raised by Suffolk County Council in Table 4.20, ID Annex C, 1.2 to Annex C, 1.10 on pages 478 to 482 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant has reviewed the judgements made in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** and remains comfortable that the matters raised have been considered and that the assessment is fair. The historic environment of the Waveney Valley has been assessed in documents **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]**. The Applicant considers the assessment to be proportionate and appropriate within the DCO framework. The Applicant acknowledges that the Project will alter the setting of designated and non-designated heritage assets within the Waveney Valley, but such changes have been robustly assessed, and mitigation has been incorporated where feasible. The resulting

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		effects are considered acceptable when weighed against the public benefit of the Project and compliance with NPS EN-1 and EN-5. The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation within the Waveney Valley as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.3 Consideration of specific areas – Dedham Vale National Landscape		
8.3c	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] We have an extensive right of way network across the districts, and there is the potential for kinetic views traveling towards the national landscape. There's no hard limit, obviously, as to where your appreciation or enjoyment of the natural beauty of the national landscape starts and finishes. So, particularly with the cable sealing end compound, which is around Wenham Grove we've also made reference to asking the ExA to be satisfied that the assessment of all the cumulative infrastructure associated with the EACN, including pylons and overhead lines, in terms of the impacts on the setting of the national landscape, are considered. And we made reference to the recent application by Thorington Street for Dark Skies status, and that has been awarded.	Underground cables are proposed through Dedham Vale National Landscape and parts of its setting, to minimise effects on the National Landscape and its setting. The Applicant has undertaken a study to identify the setting of the National Landscape and this is shown on Figure A13.5.4 and Figure A13.5.5 in Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Wenham Grove CSE compound and the EACN substation are located outside the identified setting of the National Landscape. The effects of the Project as whole, including the overhead line, EACN and CSE compounds is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Public Rights of Way (PRoW) within the area to the north of the National Landscape (including within its setting) are shown on page 6 of **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP4-160]**. Effects on visual receptors travelling on the PRoW network to the north of the National Landscape are considered under Visual Receptor Areas C4, C5, C6 and C7 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 above ground infrastructure, reducing to within 0.5 km of the underground cable route. The Applicant notes the recent recognition of Thorington Street as an International Dark Sky Community[9]. The settlement of Thorington Street is located within Dedham Vale National Landscape, approximately 2 km from the Order Limits for the Project, at its closest point. The Project will be undergrounded through the National Landscape and its setting. An assessment of visual effects within this area is provided under Visual Receptor Area (VRA) C8 Higham in paragraphs 13.6.83 to 13.6.94 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects are identified as significant within approximately 0.5 km during construction, as a result of construction activity associated with the proposed underground cable. No significant effects are identified at operation. LVIA Viewpoint 3.27 B1066 Park Road, near Thorington Street is located to the west of Thorington Street and represents views from this area. Visual receptors are identified as being of high sensitivity and the magnitude of effect during construction and operation (and maintenance) is judged to be barely perceptible. Effects were identified as negligible and not significant during construction and operation (and maintenance), as set out on pdf page 151 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]**. This judgement considers construction activity including lighting. The designation of Thorington Street as an International Dark Sky Community would not change the sensitivity of visual receptors (which is already high), nor the magnitude of effect, as construction activity (including lighting in the hours of darkness) is unlikely to be perceptible.
8.3d	Suffolk County Council [**REP4-336**] The Council welcomes the proposal to underground cables but highlights that significant adverse effects would remain, including impacts from associated	The Applicant considered alternative alignments to the north and west of Creeting Hall; further information is provided in paragraphs 5.4.3 to 5.4.6 of **5.15 Design Development Report [APP-122]**.

[9] https://darksky.org/places/thorington-street-suffolk/

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	infrastructure such as cable sealing end compounds. It considers that further mitigation (e.g. HDD) and compensatory measures are required to address residual harm. For Mellis Common, SCC seeks further engagement to reduce impacts through design changes. In the Gipping Valley, SCC considers that an alternative alignment could have reduced landscape harm and expresses concern that this has not been adequately explored.	The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation within the Waveney Valley, Gipping Valley and around Bramford Substation as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of National Grid or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.3e	Joanne Lesley Elliot [**REP4-403**] The cable sealing end compounds and multiple pylons will be visible widely across the Dedham Vale. The Western cable sealing end compounds at little Horkesley and its neighbouring pylons would be widely visible across the Dedham Vale.	The Applicant has provided a response on this matter under LV 1.14 on pages 262 to 264 in **8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. In summary, the Applicant agrees that the Project would be visible from parts of Dedham Vale National Landscape, however, the fact that a Zone of Theoretical Visibility plan suggests potential visibility does not necessarily equate to significant visual effects.
8.3 Consideration of specific areas – Burstall and Bramford		
8.3f	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] We note the applicant refers to their commitment to working with the Bramford to Twinstead team to deliver appropriate mitigation for the impacts of cumulative effect development around Bramford substation. We don't believe that's been submitted. There is a significant amount of development that has been enabled by the substation. So, there are significant impacts from those cumulative effects on the local communities, environment, heritage, etc. that need a strategic approach. We would like to see mitigation delivered appropriately. It goes beyond the 3 to 1 planting, in order for that to be satisfactory.	The Applicant will work collaboratively with the Bramford to Twinstead Project delivery team to coordinate matters and ensure that timings of the construction works do not conflict. The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation around Bramford Substation as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.3g	Suffolk County Council [**REP4-336**] The Council considers that a coordinated, landscape-scale approach is required to address cumulative impacts from multiple infrastructure projects. It advocates for a landscape masterplan, including restoration and enhancement measures, and raises concerns about unnecessary vegetation loss and insufficient integration of design, ecology and landscape considerations.	The Applicant's position in relation to the requirement for landscape compensation set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation around Bramford Substation as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.3h	William Petersen, on behalf of Burstall Parish Council [**REP4-419**] The Parish Council raises strong concerns regarding the severe and cumulative landscape and visual impacts of the proposed scheme on Burstall village. The scale of development is described as exceeding the landscape's capacity to absorb it, resulting in an unacceptable wirescape and industrialisation of the area. The Parish Council highlights that the substation and proposed pylon route are located on elevated ground, maximising visibility across a wide area, and that	The Applicant responded to a similar point related to cumulative effects including the battery storage proposal south of Bramford Substation (Brunfort BESS) on pages 375 to 376 of **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]**. A request for a Scoping Opinion was submitted to Babergh and Mid Suffolk District Council in May 2026. An assessment of cumulative effects between the Project and Brunfort BESS will be provided at Deadline 7. The Applicant sets out its position with regard to the mitigation hierarchy in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant considers that the mitigation

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	the village risks becoming "islanded" by surrounding infrastructure. It also raises concerns that related developments, particularly large-scale battery storage proposals, have not been properly considered as part of cumulative effects. The Parish Council argues that the mitigation hierarchy has not been properly applied and that residual effects have not been correctly assessed. Proposed mitigation measures, including tree planting and limited infrastructure changes, are considered ineffective and insufficient to address the scale of harm. Further concerns include: • Lack of realistic mitigation, with some measures described as operational requirements rather than true mitigation • Inadequate consideration of historic landscape character and omission of heritage features • Insufficient visualisations to properly understand impacts • Minimal examination time given to cumulative impacts at this location	hierarchy was systematically applied throughout the design of the Project and appropriate mitigation has been provided. The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however provided details of potential opportunities for landscape compensation around Bramford Substation as directed by the Examining Authority in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010. In response to the point regarding visualisations, the approach to selecting the Landscape and Visual Impact Assessment (LVIA) viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed with relevant Local Planning Authorities, as set out in the **Statements of Common Ground (5.9.1 to 5.9.12 [REP4-057 to REP4-080])**. The viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. The number of viewpoints assessed in the LVIA (206 viewpoints) is considered to be proportionate and appropriate in relation to the scale of the Project. The Applicant notes the concern regarding the alleged inadequate consideration of historic landscape character and omission of heritage features. However, in order to respond fully in respect of heritage features, the Applicant requests that the Interested Party identifies the specific assets or areas where omissions are considered to have occurred. In the absence of this information, it is not possible to provide a detailed response to this element of the comment. In relation to historic landscape character, the Applicant has considered the retention and management of historic landscape features within the assessment (please refer to **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]**). **7.4 Outline Landscape and Ecological Management Plan [Revision E]** includes measures to retain and reinstate historic landscape features which contribute to the setting of heritage assets. Embedded mitigation and design alternatives were also considered through the design process (**5.15 Design Development Report [APP-122]**) to minimise impacts on the historic landscape. Commitments relating to the protection of the historic environment are secured through **7.2 Outline Code of Construction Practice [Revision E]**, including specific measures under Commitment H06. Further detail is provided in response to HE1.18 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
8.3 Consideration of specific areas – Colne Valley		
8.3i	Joanne Lesley Elliot [**REP4-403**] This project is a major adverse change to the Colne Valley and its tributaries. The Applicant has acknowledged that the Colne Valley is of high sensitivity and that significant effects would occur up to 1.5km away. Although not within a National Landscape, the quality of the valley is similar to the best parts of the Dedham Vale and worthy of protection. The pylons will significantly adversely affect the setting of the part of the Essex Way which passes from West Bergholt and into the Colne Valley, the guide to the Essex Way states that the "The path is most scenic around the River Colne". The Essex way is one of the foremost footpaths in the Country with high footfall and its setting should be protected. The pylons will dominate the section of the path as soon as it leaves West Bergholt Village and all along its route to and next to the River Colne. National Grid has consistently	The Applicant has provided a response on this matter under Action No. 34 in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** and Action No 8.3p in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. With regard to effects on users of the Essex Way, the Applicant has undertaken a sequential assessment of effects in paragraphs 13.12.84 to 13.12.121 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Visual receptors travelling on the long distance route are identified as being of high sensitivity, and effects would range from major and significant (adverse) to no effect (not significant). The historic environment of the Colne Valley has been assessed in documents **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]**. The Applicant considers the

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	understated the value of this valley and have failed to properly assess it and consider mitigation.	assessment to be proportionate and appropriate. The Applicant acknowledges that the Project will alter the setting of designated and non-designated heritage assets within the Colne Valley, but such changes have been robustly assessed, and mitigation has been incorporated where feasible. The resulting effects are considered acceptable when weighed against the public benefit of the Project and compliance with NPS EN-1 and EN-5.
8.3 Consideration of specific areas – Great and Little Waltham		
8.3j	North West and South West of Chelmsford Parishes Group **[REP4-340]** The Great Waltham Village Design Statement (VDS) recognises the Chelmer River Valley as a Special Landscape Area due to its undeveloped natural beauty (Map 1, p.5). This incorporates a designation in the Chelmsford Borough Local Plan (1997). The VDS notes that the landscape quality of parish is in part due to 'a lack of electricity pylons and mobile telephone masts' (p. 4). The Chelmer Valley is also designated as a Valued Landscape in the Broomfield Neighbourhood Plan (NP) and is described in the associated Review of Local Green Space, Valued Landscape and Key Views [**REP3–106**]. Whilst the NP Area/Parish boundary defines the Valued Landscape, its characteristics continue northwards into the Walthams. The Broomfield NP also designates an area to the west of Church Green ('Land west of Church of St Mary with St Leonard, Broomfield') as a Valued Landscape. Being only 600 metres from the proposed OHL alignment at its closest point, this Valued Landscape would also be impacted. In terms of methodology, the Parishes Group believes these points taken together reveal a lack of weight given to local landscape studies, such as those produced for VDSs and NPs. These tend to be more up-to-date and are more detailed and granular than the higher level, more generic studies evidenced in the Application.	The Applicant notes that responses relating to the value of the landscape are provided in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and confirmation of the use of all relevant neighbourhood plans to inform the assessment is provided in reference LV 1.6 in **8.9.1 Applicant's Response to First Written Questions [REP3-074]** and is reiterated **in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]**. In further regard to Neighbourhood Plans and district/parish landscape studies, the Applicant notes that a response has previously been provided in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations - Part 2 [AS-089]**. With regard to methodology and assessing landscape value, the Applicant has provided further details on this in response to Action Point 24 (Landscape Institute Technical Guidance Note 02/21[10]) in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The Applicant has responded to concerns regarding the historic environment of the Waltham gap elsewhere in this document. Further responses to the respondent's concerns can be found in documents **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]** (p.198 - 201, 210), **8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]** (p. 42, 318, 373), **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (p. 44-45, 81-84), and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** (p. 411, 414-419, 422-423).
8.3k	North West and South West of Chelmsford Parishes Group **[REP4-340]** Alternatives In Section 9.2 of the Design Development Report [APP-122], the Applicant refers to consideration of alternative routes, including to the east of Chelmsford and West of Great Waltham. The Parishes Group maintains that neither of these alternatives have been considered in sufficient detail. To fully understand the Applicant's position, the Group need to receive a full and detailed response to [**REP1-261**]. To date, the only response to **REP1-261** has been the Applicant's Comments on Written Representations [**REP2-029**]. These Comments are at best partial in this regard and in places are confused. Nor do they include a proper response to the Alison Farmer Landscape Report contained in **REP1-261**. To avoid repetition, the Group refers the ExA to its REP3-104 which outlines the deficiencies in the Applicant's Comments. The Parishes Group therefore continues to await a full, detailed response to its proposals, reserving the right to respond when one is forthcoming. In the meantime, it maintains that no evidence has been presented to show that use of Corridor L is unfeasible.	The Applicant makes the overarching comment that regardless of the perceived level of effects of alternatives, the Applicant's position is that there are technical constraints that make a route to the east of Chelmsford less preferred. It may be possible to achieve a route but only through extensive levels of mitigation (potentially tunnelling) that rule this out as incompatible with National Grid's duties most notably under the Electricity Act to be economic and efficient. The Applicant also notes that it has undertaken a proportionate assessment of alternatives and its position remains that these alternatives are less preferred. The Applicants position is this assessment of preference can be robustly done without needing to gather a full suite of environmental survey data (requiring the identification of landownership and completion of a wide suite of surveys) for each of the alternatives. The proposed route is not unacceptable in policy terms and whilst the parishes group may have an understandable preference to position the route elsewhere, the Applicant disagrees with their conclusions.
8.3 Consideration of specific areas –Ingatestone and Buttsbury - the Wid Valley		
8.3l	North West and South West of Chelmsford Parishes Group **[REP4-340]**	The Applicant has provided a response to the information provided in the 2025 Alison Farmer Associates independent report included in North-West and South-West Chelmsford Parishes Group's written representation

[10] Landscape Institute (2021) Technical Guidance Note 02/21 – Assessing landscape value outside national designations

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	The Parishes Group has serious concerns about the landscape and visual impact of the Application in the Wid Valley. The proposed overhead line would extend into a part of the valley noted for its scenic quality and tranquillity. These points are explored in greater detail in the Alison Farmer Landscape Report.	**[REP1-261]** in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations – Part 2 [AS-089]** (p.649-656). The Applicant's response concludes that whilst appreciating that alternative routes seemingly address concerns of the north-west and south-west Chelmsford Parishes, the Applicant's position is that the alternatives do not justify a change. They lead to their own environmental effects, albeit a different balance transferred to other locations. They are substantially constrained at some locations to the extent that they may not be deliverable, or only deliverable with methods with substantial additional costs. On this basis the Applicant remains clear in its view that the preferred arrangement is the submitted Project.
8.3m	North West and South West of Chelmsford Parishes Group **[REP4-340]** The Parishes Group also fully supports the written representation made by Ingatestone and Fryerning Parish Council [**REP1-169**]. This draws attention to the case for substituting T-pylons instead of conventional lattice pylons to mitigate landscape and visual impacts and the impact on the important heritage assets of St Mary's, Buttsbury (Grade II* 14th century parish church) and Ingatestone Hall (Grade I 16th century manor house).	The Applicant position on the Church of Saint Mary and Ingatestone Hall has been detailed in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (p.86-88) which concludes that as the pylon alignment would be beyond the edge of the valley in which they are located. Therefore, it is still reasonable to conclude that the setting of these two listed buildings does not extend to the Order Limits. The Applicant's position regarding the use of T-pylons in reference to the historic environment is set out in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (p.361-362), which notes that the current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect.
8.4 Cumulative effects		
8.4a	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] Where can we find confirmation that the viewpoints for cumulative effects of the EACN, together with North Falls and Five Estuaries infrastructure, is consistent with those submitted by North Falls and Five Estuaries because we did have additional viewpoints added at the examination for Five Estuaries.	**8** Cumulative photomontages from other projects (Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm) were provided at deadline 4 **[REP4-303].** **9.2 Applicant's Responses to Second Written Questions – LV2.10: Cumulative Visualisations – Norwich to Tilbury, North Falls and Five Estuaries,** provided at Deadline 5, illustrates the locations of viewpoint photography taken for the Project in combination with viewpoints taken for North Falls Onshore Substation (OnSS) and Five Estuaries OnSS, all of which illustrate the extent of cumulative developments of the three developments: Norwich to Tilbury Project; North Falls OnSS; and Five Estuaries OnSS.
8.4b	Suffolk County Council [**REP4-336**] The Council considers that the following areas experience cumulative effects with other projects: • Gislingham/Burgate (EcoPower) • Gipping Valley/ Stowmarket (132kV overhead lines, Gateway 14) • Bramford/Burtsall (Bramford substation, Bramford to Twinstead, 132kV overhead lines)	The Applicant provided an assessment of cumulative effects with the Bramford to Twinstead project (DCO2) on pages 7 to 8 of **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and concluded that there would be significant landscape and visual effects during construction and operation. The Applicant provided an assessment of cumulative landscape and visual effects with the EcoPower Suffolk Solar project (DCO16) on pages 40 to 41 of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** and concluded that there would be significant landscape and visual effects during construction and operation. The Applicant provided an assessment of cumulative effects with the Gateway 14 project (BMS47) on page 97 of **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and concluded that effects during construction and operation would not be significant. The Applicant is not aware of any proposals for new 132 kV overhead lines at Bramford Substation or in the Gipping Valley. Existing 132 kV infrastructure forms part of the baseline for the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
8.4c	T Fairley and Sons [**REP4-375**] The Applicant has not produced cumulative visualisations but instead refers to Five Estuaries documents. Given that, we know North Falls environmental mitigation differed from that of Five Estuaries, and even at the end of the North Falls examination, a consensus had not been agreed we do not consider it appropriate for National Grid to rely on these visualisations. New cumulative visualisations are required based on the most recent design guide alterations. We politely request this ExA to assess the cumulative impact on Normans Farm and the Little Bromley / Ardleigh area of all three currently known Projects, whilst appreciating that we are none the wiser of the number of future	The visualisations in **7.12 Visualisations - Parts 1 to 9 of 9 [APP-343 to APP-351]** show the indicative extents of North Falls and Five Estuaries Substations, where relevant. The proposed landscape mitigation for North Falls and Five Estuaries Substations is not shown. Cumulative visualisations for Five Estuaries and North Falls were provided in Appendix A and Appendix B of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** as supplementary information. An assessment of cumulative effects between the Project, North Falls and Five Estuaries is provided in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**. An updated cumulative assessment was provided at Deadline 4 and is provided in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**. The updated cumulative assessment

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	connections National Grid may grant and which may also result in new substations being required on more of our land.	provides an assessment of cumulative effects between the Project and the proposed Tarchon Interconnector, in proximity to the EACN. Table 2.2 of **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]** includes an assessment of inter-project cumulative effects from clusters of other development with the Project. Significant landscape and visual effects are identified within the Bromley Heaths Landscape Character Area (LCA) and Visual Receptor Area (VRA) C13 Little Bromley as a result of development which includes North Falls and Five Estuaries Substations and Tarchon Interconnector.
8.5 Mitigation		
8.5a	Essex County Council [**REP4-328**] The issue of compensation for landscape and visual impacts continues to be an area of disagreement between ECC and the Applicant, although discussions are ongoing. ECC maintains that the Applicant has not properly grappled with the need to consider compensation for the significant landscape and visual impacts of the project and has failed to apply the mitigation hierarchy correctly. As set out in ECC's Local Impact Report (paragraph 4.10.43) [**REP1-161**] there remains a case for a strategic landscape compensation package to offset harm as far as possible.	The Applicant's position in relation to the requirement for landscape compensation is set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant has however engaged with Essex County Council regarding potential opportunities for landscape compensation in Essex as directed by the Examining Authority and provided further detail in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.
8.5b	Suffolk County Council [**REP4-336**] SCC welcomes the Applicant's commitment to replace any tree that requires removal with three new trees. However, SCC does not consider that the Applicant has fully explored the requested alignment changes (as identified in SCC's Post Hearing Submission, Item 5.1 [**REP1-177**]), which SCC considers would have provided further embedded mitigation.	The Applicant disagrees with Suffolk County Council's interpretation that their alignment changes have not been fully explored. Each suggestion has been fully considered by the Applicant with clear reasons stated in various documents (**7.21 2024 Design Development Report for the Project [APP-359**] and **5.15 Design Development Report [APP-122**]) for the reasons the Applicant considers that there is no clear basis for change. For example, at Mellis Common keeping the alignment to the east of the B1113 would lead to unacceptable heritage effects and angles of direction change are not compatible with low height pylons.
8.5c	Suffolk County Council [**REP4-336**] The Applicant has neither fully explored the potential of mitigation/provided landscape and visual mitigation planting beyond the CSECs areas and reinstatement planting nor considered placemaking around Bramford/Burstall. SCC therefore considers that the Application Hierarchy has not been fully applied, both in terms of landscape and visual mitigation planting and landscape compensation for residual impact and effects.	The Applicant sets out its position with regard to the mitigation hierarchy in Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the Applicant considers that the mitigation hierarchy was systematically applied throughout the design of the Project. The Applicant's position in relation to the requirement for landscape compensation set out in Section 8.2e of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]** and position on heritage compensation set out on pages 24 to 25 of Appendix E in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. The Applicant has however engaged with Suffolk County Council regarding potential opportunities for landscape compensation at Bramford as directed by the Examining Authority and provided further detail in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [Revision A]**. These plans represent no commitment at this stage on the part of the Applicant or acceptance that such compensation is required by policy. The purpose of the plans is to provide information for the Examining Authority to aid their understanding of constraints and potential opportunities and meet our commitment to produce such material to the Examining Authority at Deadline 5. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.

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8.5d	Suffolk County Council [**REP4-336**] Regarding OLEMP [**REP3-030**] paragraph 10.1.1, SCC considers that all elements that are counted as part of BNG mitigation, will need to be maintained and monitored for 30 years. Hedges and watercourses that are returned to the landowner after five years, cannot be included in the metric for BNG.	The Applicant's approach to replacement planting 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 '*Summary of responses and government response*'[11] was published following the consultation on the implementation of BNG for NSIPs consultation. The Government's response confirmed that '*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*'. 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.
8.6 Any other landscape and visual matters		
8.6a	Suffolk County Council [**REP4-336**] The Ancient Woodland Technical Note identifies 28 new ancient woodland areas within 200 m of the Order Limits, seven of which are located within the Order Limits, based on the updated Ancient Woodland Inventory. Three of the newly identified woodlands within Suffolk are located within the Order Limits (Lodgefield Row; Bushey Grove; Wenham Grove).	The Applicant confirms that these newly identified Ancient Woodlands have been included within **7.4 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]**.
8.6b	North West and South West of Chelmsford Parishes Group **[REP4-340]** The Parishes Group commissioned an independent landscape report from Alison Farmer Associates. The Report examines the landscape harms arising from the NG Preferred Route and compares them with the harms likely to arise from Corridors L and Q, which constitute an alternative OHL route to the east and south of Chelmsford. It concludes that the eastern arm of Corridor L combined with Corridor Q would be significantly better in landscape/visual and heritage setting terms than the NG Preferred Route. During the Hearing, the Inspector raised this important study and asked the Applicant for their response. There was some confusion on the part of the Applicant's representatives, initially suggesting they were unfamiliar with it but later suggesting they had responded to it in AS-089, the Applicant's Comments on Relevant Representations. In the Group's oral contribution, we emphasised that AS-089 contains no such response. In Table 2.45.1 (page 650), the Report is acknowledged, with a suggestion that a response is included 'below'. However, that appears to be an outline of the Applicant's general approach to various other landscape assessments. It is not a response to the Alison Farmer Report. A response is also missing from Applicant's Comments on Written Representations (REP2-029, pages 277-8). There is a brief and rather confused comment on the Group's overall representation. The deficiencies in the Applicant's Comments are outlined in our response REP3-104 and, in any event, there is no response to the Alison Farmer Report.	The Applicant makes the overarching comment that regardless of the perceived level of effects of alternatives, the Applicant's position is that there are technical constraints that make a route to the east of Chelmsford less preferred. It may be possible to achieve a route but only through extensive levels of mitigation (potentially tunnelling) that rule this out as incompatible with National Grid's duties most notably under the Electricity Act to be economic and efficient. The Applicant has provided a response to the information provided in the 2025 Alison Farmer Associates independent report included in North-West and South-West Chelmsford Parishes Group's written representation **[REP1-261]** in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations – Part 2 [AS-089]**. The Applicant's response is set out 'below' their comment, on page 653-654 of 8.4.1.2. The Applicant notes that the Alison Farmer Associates report was undertaken prior to the DCO Application and references documents from 2023 and 2024, including the Preliminary Environmental Information Report and associated figures. The Alison Farmer report sets out at section 1.3 the limitations of the Alison Farmer review, noting '*This review has not included detailed heritage assessments considering the significance of heritage assets and how changes to landscape setting impact their significance. When considering the effects on cultural heritage focus has been on the presence of designated heritage features and proximity to the proposed route. It does not constitute a full heritage assessment looking at significance and setting and judgements are therefore broad brush. Similarly, the review of landscape and visual effects has considered the key characteristics and any assessments which look at and articulate the special qualities of the landscape. The review does not constitute a detailed landscape and visual impact assessment and is therefore broad brush. Nevertheless, the analysis is sufficiently detailed to provide a reasonable understanding of the likely impacts and to enable route options to be compared.*' The Applicant sets out in 8.4.1.2 the reasoning why the preferred route was chosen, acknowledging the review of routes set out in the 2025 Alison Farmer report. The Applicant's response is based on detailed and up-to-date knowledge of the study area and the Project proposals, with information gathered by technical and environmental experts. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting). Its aim is to ensure that decisions regarding the project's design (route, location, or technology option) are based on a comparable basis across options and consider a balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes

[11] Summary of responses and government response - GOV.UK

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		keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. As noted by the Parishes Group, reference to this previous response was also provided under Action 8.3r on pages 49 to 51 of **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. **8.8.1 Applicant's Comments on Written Representations [REP2-029]** (pages 277-8) discusses and puts forward the reasoning for the Applicant's selection of route options north, west and east of Chelmsford. This is the Applicant's response to North-West and South-West Chelmsford Parishes Group's REP1-258, which sets out to the Parishes' alternative design and references the 2025 Alison Farmer report. NG's response also comments on the Parishes' concerns about engagement, as mentioned in the Parishes' **Comments on any further information or submissions received by deadline 2 [REP3-104]**.
8.6c	Gillian Whittle [**REP3-393**] Heritage Asset numbered 1147743 is one of the worst affected by this proposed project. The boundary of this rural Grade 2 Heritage Asset is just ten metres from the boundary of National Grid's substation site in Ardleigh. National Grid is severely downplaying its importance, and is failing to assess its true value. What will happen when National Grid's heavy machinery moves into the area? How can such a structure withstand the ground disruptions, years of noise, relentless lighting, and vibrations caused by this project? How will National Grid mitigate for large cracks in the walls and the potential instability to a Heritage Asset?	The Applicant notes the raised issue has already been addressed within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** – p. 382 and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** – ID REP1-438 p 317-318. The Applicant also gave full details about the mitigation considered for this asset within **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** – p. 350. The asset is also considered at length in **Appendix 8** of **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]** and **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]** from page 310**.**
8.6d	Jennifer Micklem [**REP4-400**] Ball's Farmhouse is a Grade II listed building. Under the current proposals, it will be surrounded by three pylons, one of which will be a tension pylon. The scale and proximity of these structures will completely alter its setting, enclosing it within an industrial framework that is entirely at odds with its historic character.	The historic environment of the Great and Little Waltham parishes has been assessed in documents **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]**, and which also include assessment methodology. The Applicant considers the assessment to be proportionate and appropriate within the DCO framework. The Applicant acknowledges that the Project will alter the setting of designated and non-designated heritage assets within the parishes, but such changes have been robustly assessed, and mitigation has been incorporated where feasible. The resulting effects are considered acceptable when weighed against the public benefits of the Project and compliance with NPS EN-1 and EN-5. With regard to Ball's Farmhouse, the assessment has concluded that the Project would result in the asset experiencing a direct, permanent moderate adverse significance of effect, which is considered to be significant in EIA terms. In NPS EN-1 terms, this is assessed as Mid Less Than Substantial Harm.
8.6e	Jennifer Micklem [**REP4-400**] There has been no meaningful consideration of less intrusive alternatives, such as T-pylons, which are specifically designed to reduce visual impact. A T-Pylon is far less obtrusive than the low lattice one yet is still 40m high, and as they are narrower, less hedgerows and trees would be lost. Whilst they would need concrete tracks, with a bit of planning through the Waltham Gap, these could be incorporated into farm tracks.	The Applicant uses the mitigation hierarchy to assist in design development and particularly notes that integral to this is consideration of its duties under the Electricity Act to be economic. This translates to a need for a specific design to be considered unacceptable in policy terms before progressing to mitigation methods with a higher economic or impact level. The Project is not considered unacceptable with the low height pylons, therefore there is no progression up the hierarchy further. Additionally, whilst noting the Affected Person's preference, the Applicant does not agree that T Pylons would be less intrusive and also does not agree that they would result in less hedgerow and tree loss. The solid structures would be backclothed or seen through filtered vegetation with the painted monopoles expected to be more visible than lattice pylons.
8.6f	Jennifer Micklem [**REP4-400**] I must also address the way this proposal has been presented to the public. The visual guides produced by National Grid use selective and unusual angles that minimise the apparent scale of the pylons. They do not reflect what people will actually see, they haven't used views from footpaths – the Essex Way will	With regard to the visualisations, the Applicant disputes the statement that these were selectively chosen or minimise the scale of the proposed pylons. As set out in paragraphs 13.7.1 to 13.7.7 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, Accurate Visual Representations (AVR) or verified views of the Project were produced in accordance with The Landscape Institute Technical Guidance Note 06/19 - Visual Representation of Development Proposals (The Landscape Institute, 2019). Many

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	be affected – or taken views from inside people's houses from the 1st or 2nd floor. That is not a fair or transparent way to present a project of this magnitude.	of the viewpoints were located on Public Rights of Way (PRoW) including 18 viewpoints on, or representative of, views from the Essex Way. Visualisations are provided in **7.12 Visualisations - Parts 1 to 9 of 9 [APP-343 to APP-351, with updates in REP4-180, REP4-181 and REP4-182]**.
8.6g	Jennifer Micklem [**REP4-400**] The Applicant should be planting trees to block the view of the pylons as an extra to their planned re-planting of 1:3 for those they fell. If they fell a 100-year-old oak tree, they plan to re-plant 3 tree whips to replace it. Tree whips are usually between 0.5-1m tall. How long will these trees take to grow? If they die, will they be replaced? If the deer eat or damage them, will they be replaced? Who will be maintaining them? Judging by the whips we've planted on our land, the survival rate is low (one in three), especially now that Essex has become so hot and dry in the Summer with reduced rainfall. Will NG maintain the hedgerows they will replace? Mature trees are available to purchase, albeit at a greater cost, and they do grow well, I have proof in my garden.	The Applicant confirms that whips and transplants (typically 2-3 year old plant stock) will be used for replacement planting. Larger and older trees (standards/heavy standards), for which there is typically a greater risk of transplant shock, and more need for active aftercare such as watering to reduce the risk of failure, will not be used outside Environmental Areas. The Applicant has committed to a five-year adaptive aftercare period for reinstated woodland, trees and hedgerows as outlined in **7.4 Outline Landscape and Ecological Management Plan [Revision E]**. Requirement 9 (reinstatement planting plan) of 3.1 Draft Development Consent Order [Revision E] secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. An extended 30-year aftercare period would apply to new areas of habitat creation within Environmental Areas in line with commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**.

4.7 Agenda Item 9 (Historic Environment)

The ExA noted that it would raise a Rule 17 letter to cover specific questions on the historic environment. The Applicant said it would respond in writing to the Rule 17 letter and made no oral summary under this agenda item otherwise. The response to the Rule 17 letter was provided at Deadline 4 see 8.17 Response to Rule 17 Letter - Historic Environment [REP4-318].

4.8 Comments on the Oral Cases from ISH2 (1 May 2026)

4.9 Agenda Item 11 (Traffic and transport)

Table 4.5 Agenda Item 10 (Traffic and transport)

Item No.	Third Party Comment	Applicant's Response
11.1 Baseline, modelling and future monitoring		
11.1a	Norfolk County Council [**REP4-332**] NCC still has concerns regarding the split of traffic and movements going through Diss. The Applicant has committed to providing further modelling to allow us to examine the impact in greater detail but we have not received any further information to date. NCC did not raise any concerns relating to modelling and junctions but we have previously made comments requesting more up to date traffic and collision data. We have received updated information from the Applicant, we are currently awaiting 2025 data which has not been released yet, but as it stands NCC consider the matter can be resolved through the SoCG for the next deadline.	The Applicant will be providing Norfolk County Council (NCC) with supplementary modelling undertaken for the inter peak period at junctions in addition to a technical note which presents the Diss access strategy and route options, modelling undertaken through both Diss and Thetford, and identifies the reasoning as to why the route through Diss is needed and of great importance for the Project. The Applicant has and will continue to engage with NCC on their concern for routeing construction traffic through Diss following their review of the additional information to be submitted at or in advance of Deadline 5. The Applicant is pleased to note that NCC has no further concerns on the junction modelling undertaken within Norfolk presented within **7.11 Transport Assessment [APP-333]**. A review of the latest available personal injury collision data has been undertaken for all Primary Access Routes and junctions within the transport Study Area. The findings of this review are presented within **7.11 Transport Assessment Addendum [Revision A]** submitted at Deadline 5.
11.1b	Suffolk County Council [**REP4-336**] SCC is reviewing junction the modelling provided by the Applicant and will respond at a later deadline (estimate mid to late May).	The Applicant notes that Suffolk County Council (SCC) is to review the modelling and assessments and will provide comment (estimate mid to late May). The Applicant will arrange a meeting with SCC following a review of all comments provided.

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11.1c	Suffolk County Council [**REP4-336**] Currently SCC has not requested any additional information but may do so if required as matters are raised through the examination.	The Applicant notes that no further information has been requested by SCC at this stage.
11.1d	Suffolk County Council [**REP4-336**] How monitoring of junction performance will be undertaken and what intervention looks like. Would need real time traffic surveys. From experience from other NSIPs in delivery can only consider fixed points such as peak years and can be complicated by delays in program or changes in local network distribution. Intervention could be via a commitment for a contingency fund (as SZC Deed of Obligation) or agreement albeit there is a significant risk that mitigation occurs after the impact. Subject to detail applicants' proposals to monitor and if necessary, implement mitigation would be welcome	In response TT 1.33 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant set out that the full scope of the monitoring of key junctions, including trigger points for mitigation and mitigation measures (anticipated to include proactive and reactive measures), will be agreed with the relevant Local Highway Authorities and National Highways as part of the discharge of Requirement 4 of **3.1 Draft Development Consent Order [Revision E]**. The Applicant will engage with SCC, other Local Highway Authorities and National Highways on the use of real-time traffic information. **7.3 Outline Construction Traffic Management Plan [Revision D]** was updated at Deadline 4 to provide additional detail on the monitoring and management of construction traffic movements. Paragraph 5.4.18 has been updated to state how the Main Works Contractor(s) will develop a booking/scheduling system to schedule Heavy Goods Vehicle (HGV) deliveries to site throughout the construction period. This system will enable a three-month look ahead, to understand the predicted HGV deliveries (movements), per site access point in advance. The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within **7.11 Transport Assessment [APP-333]** and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents and the Applicant's Environmental Clerk of Works considers that these would have the potential to introduce materially new or materially different residual effects, the Main Works Contractor(s) will discuss with the Applicant and the relevant Local Highway Authority, and National Highways where appropriate, suitable steps to avoid or mitigate such effects. The Applicant and its appointed Main Works Contractor(s) will develop a monitoring framework, which will include potential mitigations, as part of the final Construction Traffic Management Plan.
11.1e	Suffolk County Council [**REP4-336**] SCC content that use of the Institute of Environmental Management and Assessment guidance on the environmental assessment of road traffic to assess the impacts during the construction phase is appropriate rather than GG142 Walking, Cycling and Horse Riding that is more relevant to the operational long-term impacts such as new highways.	The Applicant notes SCC's agreement that the assessment of effects on walking, cycling and horse riding within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has used the most appropriate guidance.
11.1f	Thurrock Council [**REP4-339**] It is continuing discussions with the applicant to obtain additional raw traffic data to better understand traffic flows on key corridors and assessed junctions. Further information and assurances are being sought to confirm that the traffic appraisal is fair and reasonable with outstanding data to be expected shortly. The Council noted that while National Highways did not raise significant concerns regarding M25 Junction 30, the Council's review indicates that the junction is marginally over capacity within the assessment scenarios, and potential mitigation measures such as signal optimisations may need to be explored. The Council also highlighted significant concerns in relation to the Asda roundabout on the A1089 at Tilbury, where current modelling predicts substantial future congestion that would be exacerbated by the proposed development. Further clarity and assurance from the Applicant are therefore required regarding the impacts and potential mitigation at this junction.	The Applicant has and will continue to engage with Thurrock Council regarding the impacts and potential mitigation at the Asda Roundabout on the A1089 and all junctions assessed. Traffic data used within **7.11 Transport assessment [APP-333]** has been submitted to Thurrock Council for review, along with supplementary information as part of Appendix C of **7.11 Transport Assessment Addendum [Revision A]** at Deadline 5. The traffic data will provide assurances that the traffic appraisal undertaken is appropriate to assess the full impact of the Project on the highway network.
11.1g	National Highways [**REP4-343**]	The Applicant notes that National Highways (NH) are still to verify the traffic flow data, trip generation and assignment provided to them. The Applicant has and will continue to engage with NH on this matter.

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	Construction traffic flows appear to have been determined robustly, using a first principles approach based on the number of staff and number of materials required by the project team. However, NH has not yet been able to verify the values provided and, therefore, based on the information provided by the Applicant thus far, NH is unable to trace fully how the required number of staff results in the traffic flows (and turning movements) used in the junction modelling. In addition, National Highways does not yet have sufficient understanding of the trip distribution and assignment, which means that the impact of the development's construction traffic on the SRN cannot be agreed, nor can NH agree that the level of mitigation proposed is adequate at the locations proposed, or indeed whether mitigation is required at other locations on the SRN. Galley's Corner is a particularly sensitive location, which the Applicant has modelled using ARCADY software. Given the junction's complexity and existing traffic levels, NH requires a microsimulation model to be used to assess the impact of the development at Site 48 (A120 / Long Green / B11018 / Cressing Road (Galley's Corner) Roundabout), that also includes the A120 / A131 Marks Farm and B1018 / Millenium Way roundabouts. The interaction between these junctions is significant at this location due to their proximity and traffic volumes. Further, the forecast increase at Mark's Farm Roundabout significantly exceeds National Highways' threshold for requiring a modelling assessment. At present, Mark's Farm has not been assessed by the Applicant. NH has identified from information provided recently by the Applicant that material being brought to sites in North Essex would be using the A120. This likely means that a significant number of construction vehicles would be using M11 Junction 8, M25 Junction 28 and M25 Junction 29, which do not have free-flow interchanges between the SRN links and may be susceptible to congestion from additional traffic. NH has raised with the Applicant that the operation of the M11 Junction 8, M25 Junction 28, and M25 Junction 29 should be considered for junction modelling, or a justification should be provided for the scoping out of these junctions. No modelling of these has been undertaken of these to date. Discussions are planned with the Applicant.	The Applicant notes that NH are still to verify if the level of mitigation proposed at junctions assessed within **7.11 Transport Assessment [APP-333]** is adequate and whether further mitigation is deemed required. The Applicant has and will continue to engage with NH on this matter. The Applicant has undertaken further engagement with NH on the need for a micro-simulation model at Site 48 (A120 / Long Green / B11018 / Cressing Road (Galley's Corner) Roundabout), that also includes the A120 / A131 Marks Farm and B1018 / Millenium Way roundabouts. The Applicant and NH have agreed that NH's existing micro-simulation model will be used to assess the temporary impact of the Project on the operation of Site 48. The Applicant notes NH's concern regarding the impact on the operation of the M11 Junction 8, M25 Junction 28, and M25 Junction 29. The Applicant will provide NH with details on potential use of these three junctions by the Project in terms of AM and PM peak hour construction traffic movements and the duration of the temporary impact on their operation.
11.1h	National Highways [**REP4-343**] National Highways has requested further information to assist in our review of the junction modelling and assurance of the proposed mitigation, which remains outstanding. This is as follows • The total increase in total vehicles at each of the SRN junctions within the study area, along with further information about how these figures were reached so that the extent of the scope of junction assessments can be agreed. • Information detailing how the net increase at each SRN junction was determined. • Information regarding the trip distribution at SRN junctions. • A more in-depth collision review should be undertaken whereby collision clusters and patterns within the junctions and their associated slip roads are understood • The Road Safety Audit 1 at A12 J55 (Copdock) is required as the applicant has this in hand. • Evidence of the model validation should be provided for any model of an SRN junction.	The Applicant notes the list of additional information requested by National Highways (NH) which has been submitted to NH for review. This includes: • A construction traffic assignment methodology note will be submitted to provide NH with an understanding on methodology used to assign construction traffic trips to the highway network and junctions and identify net increase in traffic flows • Details on trip distribution at Strategic Road Network (SRN) junctions were provided to NH for review prior to Deadline 4 which provided a matrix of movements at each junction for Project flows and also committed development flows. However, the Applicant will provide a summary of the total and net increase for all SRN junctions assessed within the Study Area identified within **7.11 Transport Assessment [APP-333]**. Further engagement with NH will be undertaken to confirm our understanding of its request • Within **7.11 Transport Assessment Addendum [Revision A]** a further review of collision data has been undertaken for all SRN junctions within the Study Area. This review identifies collision clusters and patterns within the junctions and their associated slip roads • A Stage 1 Road Safety Audit for the A12 J55 (Copdock) is to be undertaken. The Applicant will submit the Audit Brief to NH for review

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	The Applicant recently provided NH with additional information concerning Traffic survey data to enable NH to verify the application of the growth factors and Traffic flow diagrams. This information is currently being reviewed.	• Evidence of the model validation for SRN junctions assessed will be provided to NH for review.
11.1i	National Highways [**REP4-343**] The monitoring and review processes of the outline Construction Traffic Management Plan are considered acceptable by NH for the proposed development. NH requests to be consulted when reviewing monitoring results for areas that impact the SRN, such as monitoring associated with the new East Anglia Connection Node (EACN) Substation. NH wishes to agree the controls that are included within the Construction Worker Travel Plan.	Paragraph 5.4.18 of **7.3 Outline Construction Traffic Management Plan [Revision D]** was updated at Deadline 4. This sets out the monitoring approach to be implemented through the booking and scheduling system. The section explains that, where the three-month look-ahead identifies any predicted exceedances of the construction traffic forecasts presented in **7.11 Transport Assessment [APP-333]** and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** and where National Grid's Environmental Clerk of Works considers that such exceedances could result in materially new or materially different residual effects, the Main Works Contractor(s) will engage with the Applicant, NH and the relevant Local Highway Authority. This engagement will seek to agree suitable measures to avoid or mitigate any such effects.
11.1j	National Highways [**REP4-343**] A WCHAR is needed, or justification for exemption must to be submitted, at any point on the SRN where changes are proposed that will last for a period of least six months. NH highlight specifically the proposals at A12 J55 (Copdock) and A120 Great Tey Road Junction where no WCHAR has yet been provided, nor a justification for exemption.	The Applicant notes National Highways (NH) requests that either a WCHAR (Walking, Cycling and Horse-riding Assessment and Review) or Exemption Note are required at any point on the Strategic Road Network where changes are proposed that will last for a period of least six months. An Exemption Note will be prepared and submitted to NH for the A12 J55 (Copdock). Mitigation at the A120 Great Tey Road Junction is under discussion. Should mitigation be provided at this junction, a WCHAR assessment will be undertaken and submitted to NH.
11.2 Abnormal Indivisible Load (AIL)		
11.2a	Suffolk County Council [**REP4-336**] SCC welcomes the approach the Applicant has made in regard towards assessing routes for AIL movements. Discussions are ongoing with the main concern being the availability of LHA resources to support this due to the numerous commitments for other consented NSIPs. A developers forum across the local highway authorities (and police forces?) that includes liaison on AIL movements would be welcome to SCC.	Suffolk County Council's (SCC's) concerns regarding resourcing and other Nationally Significant Infrastructure Projects are acknowledged. The Applicant also recognises a joint developers forum as suggested would be valuable and welcomes further discussions with SCC on this matter.
11.2b	Suffolk County Council [**REP4-336**] Update on the status of AIL route planning and assessment Noted in table CTMP 5.1 that access to Bramford Substation H10-A2 is via A1156. For special order movements the route used is typically Ipswich west bank – A137 – A14 – A1214 – A1071 –B1113 not A1156 although the latter may be acceptable for moving cable drums.	The route noted as typically used for special order movements is proposed as an option for the Transformer Delivery AIL, the other option departing from the East Bank at Port of Ipswich (noting structural concerns in the past for Ostrich Creek Bridge at the West Bank), but both options avoid the A1156. This is proposed as part of route H11-AIL1 which is presented in Section 4.2 of **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**. The purpose of the table referred to (Table 5.1 in **7.3 Outline Construction Traffic Management Plan [Revision D]**) is to acknowledge the most onerous vehicle which is anticipated to use each (or part of the) route. H10-A2 is listed alongside the Transformer Delivery AIL to cover the fact that the end section of H10-A2 (Bullen Lane up to Bramford Substation) coincides with the end section of route H11-AIL1 for the Transformer. The Applicant notes previous feedback provided by SCC for the A1156 route, for structures along the B1113 section off the A14 Junction 52 (this is noted as a discounted Transformer route in Appendix D.2 of **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**), and hence the access route via the A1156 is proposed for the Large Mobile Crane AIL only. Cable drums are not proposed for AIL deliveries to Bramford Substation.
11.2c	Essex Police and Suffolk Constabulary [**REP4-341**] The Joint Forces welcome the Applicant's acknowledgement that engagement with the Joint Forces is critical to ensuring the timely delivery of the project. However, the Applicant inherently bears responsibility for establishing and maintaining this collaborative relationship. Whilst the Joint Forces will continue to assist the	The Applicant welcomes the Joint Forces' comments and can confirm regular engagement with the Joint Forces has occurred and will continue throughout the detailed design stage and the construction period. The Applicant will provide to the Joint Forces regular updates on AILs. As soon as any specific details can be provided to the Joint Forces, they will be.

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	Applicant insofar as possible, the Applicant needs to ensure that it remains in ongoing communication with the Joint Forces at every stage. The Joint Forces note that there are practical issues in providing full information on AILs at this stage. However, the Joint Forces ultimately need to be kept as informed as possible by the Applicant. The Joint Forces would welcome regular updates on this, even where such an update simply discloses that this remains outstanding.	
11.2d	Essex Police and Suffolk Constabulary [**REP4-341**] Whilst the Joint Forces will be guided by the Applicant, the Joint Forces invite the Applicant to consider whether any AIL escorts would be required before Q3 2028. For example, the Joint Forces consider it reasonable to assume that initial supporting infrastructure, such as temporary worker cabins, may need to be escorted to the site prior to Q3 2028. Accordingly, we wish to reiterate that the Joint Forces will require at least 18 months from receipt of stand up funds/completion of a binding legal agreement to fully stand up an escort team. Therefore, we suggest that the Applicant considers whether it is likely that any AIL movements are reasonably likely to be required before Q3 2028 and, if so, we request expedited engagement on this to ensure that timescales can be delivered.	The Applicant's preliminary view, informed by consultation with the Main Works Contractors, is that AIL Police escorts would not be required for the delivery of initial supporting infrastructure but in the unlikely event that they were required, the number of AIL movements would be ad hoc and relatively low. The Applicant will continue to engage with the Joint Forces on this matter and provide regular updates. The Applicant has previously noted the Joint Forces' requirement for at least 18 months to fully stand up an escort team and is engaging with the Joint Forces regarding a legal agreement.
11.2e	Essex Police and Suffolk Constabulary [**REP4-341**] The Joint Forces further wish to emphasise that the impact with respect to traffic and transport on the Joint Forces is broader than just AIL funding. Accordingly, we reserve our position with respect to the extent to which obligations are required in favour of the Joint Forces in a s106 agreement. The Joint Forces also consider it possible that it may be appropriate to secure a commitment within the s106 for the Applicant to enter into a separate binding contract with the Joint Forces to provide for the funding for AIL services. The Joint Forces have requested below that we are able to engage with the Applicant's legal representatives in order to progress further on legal agreements.	The Applicant notes the comment regarding the traffic and transport impact on the Joint Forces and is engaging with the Joint Forces on this matter. A meeting has taken place between the Applicant's legal representatives and the Joint Forces' legal representatives to discuss the most appropriate legal mechanism through which the Applicant would commit to provide future funding for AIL services.
11.2f	National Highways [**REP4-343**] The Applicant's AIL routing strategy is agreed by NH for the current stage of development. It is noted that two structures have weight restrictions on them and will need to be assessed by the Applicant. The Applicant is encouraged to seek formal approval for its proposed AIL routes through the Electronic Service Delivery for Abnormal Loads (ESDAL) process.	The Applicant will also seek formal approval for AIL routes through the ESDAL process as noted and at the appropriate time and will continue to engage with National Highways in doing so.
11.3 Cumulative impact		
11.3a	Suffolk County Council [**REP4-336**] Coordination and mitigation: Noted that the Applicant considers that few if any of the developments considered for inter-cumulative impacts are considered to interact in terms of traffic. NSIP The main area where co-ordination between NSIPs (and TCPA energy projects) that has been identified are: • AIL access to Bramford Substation via Sproughton • HGV access to Bramford Substation via Claydon • A140 / A143 as conduit for East Pye Solar Development • A140 corridor if EcoPower comes forward.	Suffolk County Council's (SCC's) concerns on this matter are acknowledged and a coordinated approach with the relevant parties, and developments, is something the Applicant agrees would be beneficial and can look to arrange, as the Project develops. As detailed within Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]** the Applicant commits to ensure liaison takes place by the Main Works Contractor(s) with Local Highway Authorities, National Highways and other developments to ensure a coordinated approach to construction traffic management. The Applicant recognises a joint developers forum as suggested in 11.21a would be valuable and welcomes further discussions with SCC on this matter to coordinate with Nationally Significant Infrastructure Projects and other developments.

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	A co-ordinated approach to assessments for these movements would be an advantage to both undertakers, albeit Bramford to Twinstead has been consented and the CTMPs discharged. The proposed mitigation at the junction of the B1113 Lorraine Way and Bullen Lane is welcome and would be of benefit as a permanent feature improving access for AILs to Bramford Substation. There are matters of detailed design such as drainage to be agreed and the selection of a temporary compound at another location would reduce the environmental impacts on the wooded fringe north of Bullen Lane.	
11.3b	National Highways [**REP4-343**] NH is satisfied that all relevant committed developments have been included in the cumulative assessment. However, NH has also requested the turning movement at each SRN junction associated with each committed development.	The Applicant notes National Highways (NH) considers that all relevant committed developments have been included within the cumulative assessment. Turning movements at all Strategic Road Network junctions for the Project construction traffic and flows associated with committed developments were provided to NH prior to Deadline 4 for review.
11.4 The Outline Construction Traffic Management Plan		
11.4a	Babergh and Mid Suffolk District Council [**REP4-321, REP4-322**] The cumulative traffic impact not just from NSIPs, but from other large scale, particularly energy, projects which do require AIL deliveries on a relatively constrained network across Suffolk, it must be said has a significant impact on our residents and communities and businesses. The road closures can result in very large diversion routes and we feel that there needs to be more responsiveness to development that starts to emerge as a result of other projects such as Bramford to Twinstead and Norwich to Tilbury, with the capacity on the network increasing and how the connections queue progresses. So, if that can be picked up as part of the management plan documents for delivery, that would be helpful.	The Applicant provided a response on the management of the cumulative impact associated with Abnormal Indivisible Loads (AILs) in Action Number 43 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The cumulative impact associated with AILs will be mitigated by the use of the Electronic Service Delivery for Abnormal Loads system to manage any impact on the operation of the network. AIL movements will be scheduled outside peak traffic periods when baseline traffic is lower on the highway network. The Applicant has also provided additional information on joint working with other projects in Action Number 44 of **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]**. The Applicant updated Section 6.6 of **7.3 Outline Construction Traffic Management Plan [Revision D]** to include a commitment to engage with other forums set up and managed by other Local Highway Authorities. The Applicant will engage with the Local Highway Authorities to understand the suitable forums which could be used to communicate relevant information throughout the construction period and include additional detail on the coordination and collaboration within Section 6.6 in later iterations of **7.3 Outline Construction Traffic Management Plan [Revision D]** as necessary.
11.4b	Suffolk County Council [**REP4-336**] Travel plans: SCC noted AP46 to clarify references to PARs in travel plan table 2.1, which do not match ES Figure 6.16 [**AS-020**] references.	The Applicant notes the request to clarify the Primary Access Route references, and will provide this to Suffolk County Council.
11.4c	Suffolk County Council [**REP4-336**] Measures to reduce and monitor number of Heavy Goods Vehicles (HGV) and whether a cap on the number of HGVs is required: SCC's position is that if the Applicant is satisfied that the assessment is robust there should be no objection to placing caps on HGV movements. Otherwise, the LHAs concerns that delays may result in a compressed delivery program which may result in vehicle movement s exceeding those assessed. SCC notes that CTMP allows the applicant to engage with the LHA to make non-material changes to the CTMP which would be a suitable mechanism for discussion if the Applicant considered any caps to need modification. The offer of mitigation whilst welcome may result in action being taken after the impact is felt.	**7.3 Outline Construction Traffic Management Plan [Revision D]** was updated at Deadline 4 to provide information on the monitoring of construction traffic against the construction traffic forecasts. Paragraph 5.4.18 states that the Main Works Contractor(s) will develop a booking/scheduling system to schedule Heavy Goods Vehicle (HGV) deliveries to site throughout the construction period. This system will enable a three-month look ahead, to understand the predicted HGV deliveries (movements), per site access point in advance. The construction vehicle and construction workforce traffic movements will be reviewed against the assumptions (construction traffic forecasts) detailed within **7.11 Transport Assessment [APP-333]** and **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents and National Grid's Environmental Clerk of Works considers that these would have the potential to introduce materially new or materially different residual effects, the Main Works Contractor(s) will discuss with National Grid and the relevant Local Highway Authority, and National Highways where appropriate, suitable steps to avoid or mitigate such effects. The Applicant and its appointed Main Works Contractor(s) will develop a monitoring framework, which will include potential mitigations, as part of the final Construction Traffic Management Plan.

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		The Applicant considers this approach, along with the robust trip generation undertaken, sufficient to enable HGV trips to be proactively managed with the Local Highway Authorities without the need for a vehicle cap.
11.4d	Suffolk County Council [**REP4-336**] Maintenance of highways during construction and reinstatement on completion: The dDCO protective provisions include recovery of extraordinary expense. However, in section 13 this is to be recovered at the end of each phase. Recovery needs to be more flexible with recovery as soon as practical after the cost is incurred as some stages of the project may take several years to deliver and the LHA needs to comply with its Highways Act s41 duties. SCC consider that this can be resolved in FHA/PP discussions.	The Applicant notes this request and will consider it as part of the FHA/PP discussions. The Applicant would welcome a schedule of FHA/PP comments from SCC and the other host highway authorities to help progress discussions.
11.4e	Suffolk County Council [**REP4-336**] Non-primary access routes: SCC noted that pre-commencement activities are managed by CTMP but that this includes temporary accesses. Clarification required that these are not temporary accesses for access to haul roads or crossings of the public highway associated with use of the haul road. See table 5.2 that implies cross overs are considered temporary works and can be access by routes other than primary access routes. SCC queries what volume of construction traffic and will mitigation be in place before use. AP46: SCC welcomes the inclusion of the non-primary access routes into the OCTMP, however would like to see more information on these, including estimated vehicle numbers, length of time the route will be used for and what the routes are.	The temporary accesses item in Table 5.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]** relates to access required by a small number of construction vehicles for the construction of the crossover and UK Power Networks bellmouths only. This is needed as the haul road may not be in place to facilitate constructing these from the adjoining land parcels, and they will need to be constructed from within the highway boundary. These will be used by small numbers of vehicles only. The Applicant has assessed the anticipated traffic increases associated with these activities. The analysis indicates that the expected peak daily traffic associated with these activities is low and duration is short term. In general, the total traffic increases are expected to remain below 10% of the baseline traffic flows, with the exception of locations where baseline traffic volumes are very low. The traffic impacts have been assessed as between negligible and minor and therefore no mitigation measures are considered necessary. AP46: The anticipated vehicle types for the activities on non-Primary Access Routes (PARs) are detailed within Table 5.2 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. 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 considered feasible to identify each of the routes and access points associated with each of these activities. These activities are not expected to be onerous in terms of time, or associated with a high volume of Heavy Goods Vehicle (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 average HGVs associated with non-PARs is four HGVs. The most onerous activity is the construction of bellmouths, with approximately 20 HGVs. The Applicant has assessed the anticipated traffic increases associated with the pre-commencing 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, the 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.
11.4f	Suffolk County Council [**REP4-336**] Extent of non-definitive commitments and how the ExA and highway authorities can be assured certain commitments will be delivered SCC considers that it would be helpful to agree the area and heads of terms for the CTMP pre and post construction surveys at DCO stage to avoid latter disagreement and to give comfort to the public this is being considered.	The Applicant proposes that this matter be discussed as part of the regular meetings between SCC, the Applicant and the Applicant's Contractor.
11.4g	Suffolk County Council [**REP4-336**]	(i) The proposed temporary parking restrictions on the B1113 are intended to provide sufficient width for the movement of a Transformer Delivery Abnormal Indivisible Load, so will be for one delivery only. This

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	Traffic Regulation Orders (temporary and permanent): SCC is concerned that temporary parking restrictions could impact residents and businesses and that appropriate consolation / communication needs to be undertaken at this stage so that those affected are made aware and can voice objection if necessary. Examples would be: • The proposed temporary restrictions in Schedule 13 part 1 B1113 Bramford Road / B1113 High Street Between points TRC-001 and TR-C 002 as shown on Section C, Sheet 2. No waiting restriction 7:00am to 7:00pm Monday to Sunday. There is little if any alternative parking for residents and restricting parking has been contentions, for example during use of the road as a diversion for planned works on the A14. • The permanent 50mph speed limit on Bottle Bridge Road / Wenham Road in Schedule 13 part 4 the extent of which would not appear to be compliant with local or national speed limit policy. • The restriction of vehicular access (Schedule 13 part 2) should be used sparingly for A class and many B class roads as there are limited alternative diversion routes in rural areas of Suffolk e.g. A143 Old Bury Road, Palgrave.	process will be managed by the Main Works Contractor through the Electronic Service Delivery for Abnormal Loads system. The Applicant and SCC have discussed this location and the Applicant is considering the matter further. (ii) The permanent speed restriction for Bottle Bridge Road is proposed for the safe operation of the permanent bellmouth JC-B013 as shown on Sheets 3, 4 and 5 of **2.5 Access, Rights of Way and Public Rights of Navigation - Section C [REP4-019]**. It extends approximately 2.6 km from the junction of Wenham Road and Saxon Lane to the junction of Bottle Bridge Road and Raydon Road, as shown on Sheets 3, 4 and 5 of **2.4 Traffic Regulation Order Plans – Section H [Revision C]**. The Applicant will engage further with Suffolk County Council on their concerns regarding the alignment of this restriction with local and national policy. (iii) The restriction of vehicular access Traffic Regulation Orders provided within Schedule 13, Part 2 of **3.1 Draft Development Consent Order [Revision E]** are required to facilitate the safe construction of the Project. They are intended as a worst-case scenario, and it is unlikely that all of these will be required. In addition, all works within the highway boundary requiring the use of these restrictions will be booked and coordinated by the Main Works Contractor through the Permit Schemes, minimising duration of impact and disruption on the local road network.
11.4h	National Highways [**REP4-343**] NH has agreed the outline Construction Workers Travel Plan. However, until the trip distribution/ assignment and junction capacity modelling have been agreed, NH is unable to determine whether any HGV caps are required, including the locations where they should be applied. NH has requested that future traffic monitoring reports by the primary contractor should include an in-depth evaluation of potential rerouting measures to manage congestion or road closures, with clear mapping of contingency routes for identified problem areas on the SRN. NH's proposed Protective Provisions deal with maintenance of the SRN during construction and reinstatement and provide sufficient safeguards to ensure the safety of the SRN. TROs have not been discussed with NH and are therefore not agreed. NH's Protective Provisions require consent to be sought from NH for TROs, outside the DCO approval, to ensure the safe operation of the SRN.	The Applicant notes the first point regarding agreement of trip distribution/ assignment and junction capacity modelling and will continue to engage with National Highways on this matter. The proposed contingency route procedure is set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. In addition, the Main Works Contractor(s) will utilise the website OneNetwork and liaise with National Highways or the relevant Local Highway Authority directly, to establish where pre-defined construction routes may be disrupted by other works or events. They will seek to establish alternative routes that, as far as practicable, are consistent with those set out above. Where required, the Main Works Contractor(s) will propose the estimated frequency of the use of the contingency routes and share information with the Local Highway Authority. The Applicant has engaged with National Highways through the regular engagement and Transport Working Group meetings on the need for the Traffic Regulation Orders (TROs), but acknowledges that the specific details as set out in Schedule 13 of **3.1 Draft Development Consent Order [Revision E]** have not been discussed in detail. The Applicant is preparing further clarification on the need for each TRO and will share this information with National Highways before close of Examination.
11.5 Mitigation		
11.5a	Suffolk County Council [**REP4-336**] Proposals at junctions and links: The limited improvements on Suffolk roads are considered reasonable although in practice vegetation removal may be more widespread than shown on the plans. The Applicant will need to ensure they have the necessary powers to trim vegetation belonging to landowners adjacent to the public highway.	The Applicant's assessment of all Access Routes has included identification of areas where vegetation removal is required for safe operation of the Primary Access Routes and Site Access Points. These are identified on **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans Sections A to G [APP-313 to APP-314, REP4-172, APP-316 to APP-319] and Section H [Revision C]**, and the necessary powers have been sought within the Development Consent Order application for locations where clearance or other mitigation has been identified to require land extending beyond the public highway.
11.5b	Suffolk County Council [**REP4-336**] The proposed drivers information pack: SCC considers that there needs to be enforcement of any significant non-compliance with this as it only seems to form advice rather than a contractual obligation. SCC considers that the drivers information pack should be shared with LHA. In the CTMP (2.3.6), it is noted that HGV drivers are expected to make use of an appropriate lorry park, services or	The Applicant provided detailed information on the Driver Information Pack in **8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]** to demonstrate that the content of the final Driver Information Pack will be effective (Action Point 48). This additional detail is incorporated in **7.3 Outline Construction Traffic Management Plan [Revision D]** at Deadline 5. **7.3 Outline Construction Traffic Management Plan [Revision D]** confirms that the Driver Information Pack will include details of disciplinary measures for non-compliance with the Driver Information Pack,

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	other designated overnight parking locations although these are limited in East Anglia and can create other issues, for example as experience with use of laybys on the A12.	and that the Main Works Contractor will implement an audit and monitoring system. These measures ensure that compliance forms part of the contractual and managed construction arrangements, rather than being advisory only. The Applicant also notes Suffolk County Council's request for the Driver Information Pack to be shared with the Local Highway Authority. The final Driver Information Pack will be prepared by the Main Works Contractor and will be made available to the relevant Local Highway Authority as part of ongoing engagement. Comments regarding Heavy Goods Vehicle driver parking are noted. The Driver Information Pack will include guidance on locations where parking on the local highway network would not be appropriate. In addition, Section 6.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]** confirms that parking or waiting on the highway in inappropriate locations, which could give rise to highway safety or capacity issues, would constitute non-compliance and be subject to the Contractor's compliance and enforcement procedures.
11.5c	Suffolk County Council [**REP4-336**] The outline code of construction practice: SCC notes that the CTMP (3.1.2) states that appointed Main Works Contractor(s) are responsible for developing and adopting the CTMP, National Grid is held responsible for any breach of compliance with the CTMP. It is not unreasonable to expect a quarterly report on the key transport parameters. i. HGV numbers and distribution ii. Exceedance of assessed volumes (or caps) iii. Non-compliance with routing or timing iv. Compliance with key mitigation e.g. avoidance of school start / finish (Stowupland) or shift times v. Worker numbers vi. Car share ratios	Paragraph 8.2.1 of **7.3 Outline Construction Traffic Management Plan - Appendix B – Outline Construction Worker Travel Plan [Revision B]** provides an overview of the approach to the quarterly review of worker travel. The Travel Plan Coordinator (TPC) will maintain a record of progress against the Travel Plan targets based on the results of the mode split surveys. This information will be sent to the relevant Local Highway Authority, anticipated to be at quarterly intervals, in the form of a monitoring review report. The TPC will collect data from the workforce regarding actual shift start and finish times quarterly during the construction programme, to capture potential differences in seasonality, and will collate, review and summarise the data to inform the monitoring review report. Transport Coordinators will also be appointed to liaise with the Local Highway Authorities to provide monitoring reports for the Construction Traffic Management Plan. Paragraph 6.2.4 and Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision D]** note that results of inspections will be recorded and incidents of non-conformance will be shared (and corrective actions will be agreed) with the relevant Local Highway Authorities. Paragraph 6.3.3 of **7.3 Outline Construction Traffic Management Plan [Revision D]** notes that data recorded from the non-compliance procedure will be collated on a quarterly basis by National Grid and the Main Works Contractor(s) and will be issued out to the relevant parties, including Local Highway Authorities and National Highways. The Applicant will continue to engage with Suffolk County Council regarding the form and contents of the Quarterly Report.
11.5d	Suffolk County Council [**REP4-336**] SCC does not consider that 7 day working and the associated traffic is unacceptable in terms of impact on local communities due to the scale and duration of this project and in Babergh cumulative impact with Bramford to Twinstead.	Please refer to response DCO 1.S10 on pages 205-215 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, where the Applicant responds to this point.
11.5e	National Highways [**REP4-343**] Mitigation measures have been proposed by the Applicant and discussed with NH. However, NH cannot confirm the adequacy of the proposals until the forecast demand is agreed. Further, there are additional sensitive locations where mitigation may be required, once the demand forecasts (trip generation, distribution and assignment) have been agreed and the junction modelling can be properly assessed.	The Applicant notes that National Highways (NH) are still to verify if the level of mitigation proposed at junctions assessed within **7.11 Transport Assessment [APP-333]** is adequate, and whether further mitigation is deemed required, until demand forecasts and modelling assessments have been fully reviewed by NH. The Applicant has and will continue to engage with NH on this matter.

4.10 Agenda Item 12 (Public Rights of Way)

Table 4.6 Agenda Item 12 (Public Rights of Way)

Item No.	Third Party Comment	Applicant's Response
12.1 Applicant to outline mitigation, measures to reduce time and length of diversions and communication of impacts on PRoWs		
12.1a	Suffolk County Council [**REP4-336**] SCC (PROW) echoes SCC (Landscape) comments regarding PROW and visual and amenity impacts on the PROWs and any mitigation/offsetting. SCC has been in discussions on diversion routes, and their suitability and RSAs if needed to ensure that diversion routes are safe. All bridleways and byways will need special attention with regards to construction works nearby to ensure they are a safe environment for horses to approach and pass through and for visual amenity/impact. Everything that is clearly visible from a PROW should be reviewed with regards to visual and noise impact. All of the diversion routes are short and covered in the emerging PROWMP with regards to suitability, they have been road safety audited and SCC have requested changes to the lengths of diversions, which we are accepting of. The diversion routes will be of at least the same standard. The Waveney Valley along the Angles Way (which is a long-distance footpath) will have a significant impact upon it from a visual amenity and effect the user experience inline comments.	The Applicant notes Suffolk County Council's comments regarding the need for particular attention to be given to bridleways and byways in the vicinity of construction works. As set out in paragraphs 4.2.16 and 4.2.17 of the **7.6 Outline Public Rights of Way Management Plan [Revision C]**, appropriate management measures will be implemented where Public Rights of Way (PRoWs) interact with construction works. These measures include the provision of demarcated routes, separation (such as suitable fencing) and appropriate access controls, taking account of the specific requirements of different user types, including equestrians. The detailed arrangements will be developed in consultation with the relevant Local Highway Authority PRoW Officer and informed by site-specific risk assessments. These matters will be developed further in the final PRoW Management Plan, which will be prepared by the Main Works Contractor and submitted to, and approved by, the relevant Local Highway Authorities under Schedule 3, Requirement 4 of the **3.1 Draft Development Consent Order [Revision E]**. The Applicant agrees that there would be significant visual effects on users of the Angles Way within the Waveney Valley during construction and operation, within approximately 1.5 km of the Project. A sequential assessment for users of the Angles Way during operation is provided in paragraphs 13.12.15 to 13.12.29 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**.

4.11 Applicant's Response to Further Submissions That Were Not Given Orally at CAH2

Table 4.7 Applicant's response to matters raised in response to ISH2

Reference	Third Party Comment	Applicant's Response
Chelmsford City Council **[REP4-326]**	The inspector asked the question as to if the National Grid amendment to go for full hight pylons and reduce to two pylons at TB140-TB142, would this overcome the City Council's concerns. The proposed amendment to the south of Great Waltham indicates that TB141 could be omitted and TB140 and TB142 would move closer together and revert to full height (c.50m high) with the alignment of TB140-TB136 moving to the northwest. The amendment would result a reduction in harm to the setting of Windmill House, by moving the pylons away, reducing the level harm from high to moderate, for a non-designated heritage asset of local value. However, all other harms would be within the ranges identified. The amendment therefore fails to notably reduce the heritage harms and address the City Council's concerns, although it would appear to deal with the concerns relating to the amenity impact upon Windmill House. The points raised in the City Councils Local Impact Report (REP1-153) remain - that harm to designated and non-designated heritage assets is underestimated, and the mitigation proposed is inadequate**.**	The Applicant has responded to the Council's Local Impact Report in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, from page 411, which sets out the Applicant's comments on the Council's assessment. The historic environment of the Waltham gap has been assessed in documents **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]**, and which also include assessment methodology. The Applicant considers the assessment to be proportionate and appropriate within the Development Consent Order framework. The Applicant acknowledges that the Project will alter the setting of designated and non-designated heritage assets within the Waltham gap, but such changes have been robustly assessed, and mitigation has been incorporated where appropriate. The resulting effects are considered acceptable when weighed against the public benefit of the Project and compliance with National Policy Statements EN-1 (2024) and EN-5 (2024). Further detail of how the legal and policy tests apply to harm and residual effects from the Project on heritage assets is provided in the Applicant's response to ExQ1 HE1.1 (**8.9.1 Applicant's Responses to First Written Questions [REP3-074]**)
Tharston and Hapton Parish	4.1 The construction of pylons is likely to make air pollution worse because: • Large lorries will be bringing materials into the area	The air quality assessment in **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]** concludes that the impact of emissions from construction vehicle exhausts would likely have no significant effect on air quality. Commitment GG19 of **7.2 Outline Code of Construction Practice**

Reference	Third Party Comment	Applicant's Response
Council [**REP4-338**]	• These vehicles produce exhaust fumes • Construction work creates dust and pollution Residents are worried this will harm people's health and reduce air quality.	**[Revision E]** describes the emission standard that lorries (and other construction vehicles) will adhere to. Dust impacts were also 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.
Tharston and Hapton Parish Council [**REP4-338**]	4.2 There is a local population of owls in the area. The proposed overhead wires could put owls at risk of electrocution, disturb their natural flying routes and reduce local wildlife numbers.	A comprehensive desk study and suite of wintering and breeding bird surveys have been completed to determine impacts on birds, including owls. No significant impacts were identified for these species. Owls are generally not considered to be at high risk of collision with 400 kV lines due to the height of such lines. The three common species that could be expected in Tharston and Hapton are tawny owl, barn owl and little owl. Tawny owls are typically found in woodland / parkland habitat while barn owl and little owl are found in open habitats including farmland. The overhead lines avoid or over sail wooded habitats and as such avoid tawny owl habitat. Barn owl and little owl forage at low height and as such are found well below the height of overhead cables. The size of the 400 kV lines, and the large spacing between conductors means the risk of electrocution is extremely low to birds.
Tharston and Hapton Parish Council [**REP4-338**]	4.3 Hapton's roads are not built for heavy construction traffic. The area is already experiencing problems from large lorries linked to nearby roadworks. More construction traffic could: damage road surfaces further, increase noise and disturbance and make roads less safe for resident.	Section 5.4 of **7.3 Outline Construction Traffic Management Plan [Revision D]** details the Applicant's construction routeing strategy. This sets out how construction traffic will use the Strategic and Major Road Networks to access the region. From the Strategic and Major Road Networks, construction traffic will be routed along prescribed Primary Access Routes to the site access points. There are no Primary Access Routes within the parish of Tharston and Hapton, therefore construction traffic will not be using any of the roads within the Parish.
Tharston and Hapton Parish Council [**REP4-338**]	5. History and Character of Hapton Hapton is a historic village that is recorded in the Domesday Book. Many homes in the area are over 100 years old. Residents are concerned that the development will: • Damage the look and feel of the village • Spoil the surrounding countryside • Destroy footpaths that people use regularly These footpaths are important for walking, recreation, and community life.	With regard to the historic environment, Hapton village does not have a conservation area and so it is not identified as a historic environment asset in its own right. The village does, however, contain one Grade I listed church and a further six Grade II listed buildings. The pylon corridor of the Project lies c. 1 km to the west and c. 750 m north-west of the settlement and the assessment of these assets detailed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** has concluded that the settings of none of the listed building in the settlement extend to the Order Limits. For this reason, the listed buildings were not taken further through the full detailed assessment process.
North West and South West of Chelmsford Parishes Group **[REP4-340]**	The Group's concerns are primarily with how the Holford Rules have been applied in the Chelmsford area rather than with the Rules in principle. The Group believes that insufficient weight has been placed on Rules 2, 4 and 5. The Group is also concerned that Rule 6 (dispersing new lines away from existing ones to avoid wirescape) may have been given too much weight.	The Applicant has set out its decision-making rationale extensively and presented its basis for the identification of and preference for the Project. It has also identified that regardless of the Parishes Groups preference for the alternative route proposed, there remain technical and other barriers to the successful delivery of the connection on this alternative route. .
Robert David Wass **[REP4-416]**	1. Failure to Assess the Colne Valley as a Single Sensitive Landscape and 2. Concentration of Harm Ignored. National Grid's own Design and Access Statement acknowledges that: "The overhead line crosses the River Colne, passes Ford Street Conservation Area and continues south past Aldham…" This confirms the existence of a continuous corridor of sensitivity. However, the Environmental Statement fails to undertake any meaningful cumulative assessment of the combined effects. Despite acknowledging the concentration of receptors, National Grid fails entirely to assess the cumulative intensity of harm arising from clustering infrastructure around Aldham, Fordham and Ford Street collectively. Instead, impacts are artificially diluted by treating them as separate and interchangeable effects. National Grid's assessment	The Applicant has responded to these matters under REP4-386 (Caroline Homewood) in **8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [Revision A]**, in which materially similar points have been raised.

Reference	Third Party Comment	Applicant's Response
	repeatedly refers to the "transfer of effects" between route options rather than assessing whether concentrating severe impacts within one highly sensitive valley corridor creates materially greater cumulative harm.	
Robert David Wass **[REP4-416]**	3. Failure to Properly Assess Heritage Harm. National Grid has failed to assess the combined heritage effects across the wider Colne Valley landscape. The villages of Fordham and Aldham, including Ford Street Conservation Area, contain approximately 64 listed buildings and heritage assets, including: Fordham's Grade I listed Church of All Saints; Aldham's Grade II* Church of St Margaret and St Catherine; Ford Street Conservation Area; the Grade II listed Ford Street Bridge; numerous listed medieval and post-medieval buildings; and significant Roman archaeological remains near TB047.	The historic environment of the Fordham and Aldham parish has been assessed 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]**. The Applicant considers the assessment to be proportionate and appropriate within the Development Consent Order framework. The Applicant acknowledges that the Project will alter the setting of designated and non-designated heritage assets within the parishes, but such changes have been robustly assessed, and mitigation has been incorporated where feasible. The resulting effects are considered acceptable when weighed against the public benefit of the Project and compliance with National Policy Statements EN-1 (2024) and EN-5 (2024). Further details on the Church of All Saints can be found in **8.8.1 Applicant's Comments on Written Representations [REP2-209]**.
Robert David Wass **[REP4-416]**	4. Failure to Assess Landscape and Topographical Harm The alignment between TB046–TB057 places pylons prominently on elevated ridgelines above Ford Street, Fordham and Aldham. National Grid has failed to properly assess: skyline impacts; winter visibility; cumulative valley-wide visibility; and the sequential experience of infrastructure from roads, footpaths and settlements.	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[12] 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[13].
Robert David Wass **[REP4-416]**	5. Failure to Properly Assess Recreation, Ecology and Amenity The Environmental Statement does not adequately assess cumulative impacts upon: the Essex Way; Woodland Trust land; permissive bridleways; biodiversity corridors; recreational users; or the wider amenity value of the valley. National Grid has failed to assess the combined effects of habitat fragmentation; tree loss; visual intrusion; recreational degradation; and industrialisation of the valley environment.	The cumulative impacts with respect to ecology and biodiversity are assessed in **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**; the effect of habitat fragmentation is a factor considered in impact assessment, and the Project would not give rise to any significant residual effects with respect to habitat fragmentation alone or in combination with other projects or plans. Any biodiversity corridors that would be temporarily impacted by the Project during construction would be reinstated, with new planting or allowed to regenerate from the seed bank. **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. No further assessment or mitigation is considered to be required. The CEA took into account the Planning Inspectorate guidance and the example matrix provided as part of that guidance. The Applicant's response to ExQ2 LV2.9 presents a summary of cumulative effects on views from the Essex Way. Regarding intra-project cumulative effects, Table A17.1.1 in **6.17.A1 Environmental Statement Appendix 17.1 – Intra-Project Cumulative Effects [APP-282]** states 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]**.
Robert David Wass **[REP4-416]**	6. Inconsistent and Unjustified Rejection of Undergrounding National Grid rejected undergrounding within the Colne Valley on the basis that: "The potential effects do not justify the use of underground cable…" However, this conclusion was reached without first undertaking any proper cumulative assessment of	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 National Policy Statements EN-1 (2024)

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

[13] Ministry of Housing, Communities and Local Government (2019) *Historic Environment Planning Practice Guidance*

Reference	Third Party Comment	Applicant's Response
	landscape harm; heritage harm; skyline intrusion; recreational harm; biodiversity impacts; or valley-wide visual effects.	and EN-5 (2024). 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.
Robert David Wass **[REP4-416]**	7. Fundamental Deficiencies in National Grid's Methodology The attached Schedule of Deficiencies identifies numerous failures within National Grid's assessment methodology. These are not isolated omissions. They represent a systemic failure to properly assess the true extent of cumulative harm arising from this section of the scheme. The Environmental Statement therefore materially underestimates the widespread adverse cumulative effects the Norwich to Tilbury scheme would have upon the wider Colne Valley landscape; Ford Street Conservation Area; Aldham; Fordham; and the TB046–TB057 corridor as a whole. This represents a fundamental flaw in the Environmental Statement and undermines the reliability of the Applicant's conclusions regarding landscape, visual, heritage and cumulative effects.	See response above to Robert David Wass **[REP4-416]** regarding the cumulative effects assessment.
Jayne Marshall [**REP4-399**]	This covers a number of general points including impacts of the project on landscape, best and most versatile land, traffic and construction impacts associated with working hours, lighting and removal of vegetation.	The Applicant notes the concerns raised by the IIP and the general objection to the Project. The Applicant has responded to previous submissions by the IP, in page 365 of **8.8.1 Applicant's Comments on Written Representations [REP2-029]** and on page 287 and 288 of **8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298].** The Applicant has provided an assessment of the environmental effects of the Project in the Environmental Statement submitted with the application for Development Consent.
Jayne Marshall [**REP4-399**]	National Grid has failed to provide requested information to landowners following survey work. National Grid is using bullying tactics within its Heads of Terms (Clause 17), which states that: "*The Grantor will not make any objection in respect of any planning application or Development Consent Order application submitted by the Grantee insofar as each relates to the Grantor's Land*."	The Applicant does not agree that it has failed to provide information following survey works. Engagement with landowners has been ongoing, including the provision of information where reasonably available, and continued dialogue is maintained to respond to queries and agree appropriate access and mitigation measures. In relation to Heads of Terms, Clause 17 has the purpose of providing certainty that, where voluntary agreements are reached, the agreed rights can be implemented without subsequent challenge. As clarified in Examination, this clause is not intended to prevent landowners from participating in the statutory planning process more broadly and is limited in scope to the Proposed Development.
T Fairley and Sons [**REP4-375**]	We have advised National Grid that the water table at Normans Farm and the surrounding adjacent land on which they propose to build the EACN is extremely high. From discussion with local contractors we understand that National Grid will need to dewater the area, as will North Falls and Five Estuaries. Normans Farmhouse water supply is predominantly sourced by private borehole and the productivity and viability of the surrounding land is highly dependent on the business' ability to irrigate the land using its boreholes. We are concerned that the works could result in the pollution of the existing boreholes, and/or changes to the water table that could reduce the supply of water preventing the business from irrigating this land resulting in it no longer being viable to crop and affecting the residential supply.	Intrusive ground investigations are required prior to construction, including the measurement and monitoring of groundwater levels; these investigations are secured by commitment GH01 in **7.2 Outline Code of Construction Practice [Revision E]**. Dewatering requiring lowering of groundwater levels is generally unlikely to be required for the majority of the elements of the Project. If dewatering is found to be required following detailed design that was not previously anticipated, a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors. This is secured by commitment GH11 in **7.2 Outline Code of Construction Practice [Revision E]**. A Private Water Supply (PWS) at Normans Farm was not included within the PWS dataset obtained from Tendring District Council and is therefore previously unknown. However, the closest Project works to the abstraction comprise the modification and utilisation of Ardleigh Road with the proposed East Anglia Connection Node approximately 750 m away. The intrusive works for the modification of Ardleigh Road are anticipated to be relatively shallow and unlikely to interact with the groundwater in this area. **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** included two PWSs within close proximity (approximately 200 m) of Normans Farm and due to the closest Project works requiring only shallow intrusive works (for access roads) and interaction with groundwater considered to be unlikely, the assessment concluded that impacts on those PWS are considered to be unlikely.
T Fairley and Sons [**REP4-375**]	We have also requested further information on the drainage proposals for the sites which identify a ditch in our ownership as a point to which water will be drained. Based on my Clients knowledge of the current drainage we are concerned as to why and how this point was identified and how National Grid intends this to work. It is unreasonable	Water discharge will be developed liaising with the Lead Local Flood Authorities and relevant statutory undertakers. The drainage outfall location is identified as a watercourse feature in the available Ordnance Survey mapping, and the location was developed in coordination with the consented North Falls and Five Estuaries projects. As set out in Section 5.3 of **8.2 Drainage Strategy DCO [REP4-186]**,

Reference	Third Party Comment	Applicant's Response
	for our Client to be solely responsible for maintaining a ditch that will be serving such a "significant" infrastructure asset in an area that is already known to experience flooding in periods of high rainfall and severe weather.	the appropriate collection, control and discharge of surface water is a key planning and design consideration. The surface water management would adopt a sustainable drainage systems approach, restricting discharge to the appropriate greenfield runoff rate and replicating the natural drainage processes of the catchment as closely as possible. This approach is demonstrated in principle by the existing overland flow routes for the area, as shown on page 33 of **8.2.1 Drainage Strategy Appendix B [REP4-188]**. Accordingly, the maintenance requirements for the watercourse would be no greater than those already associated with riparian ownership.
T Fairley and Sons [**REP4-375**]	Given the number of issues that have not been addressed, and which are likely to cause significant issues it is going to be imperative that the complaints procedure is appropriate for the circumstances to ensure issues can be dealt with in a timely manner and to ensure that the Projects and their contractors can be held to account for any commitments they do make. We are concerned that as three Projects will be operating together all with multiple contractors, it will not be clear who is responsible for particular issues and or any mitigation / commitments made. National Grid continue to claim, as they have done for a number of years, that they are collaborating with North Falls and Five Estuaries but the evidence of this so far has been inadequate.	The Applicant, Five Estuaries and North Falls have proactively engaged and coordinated on all matters relevant to final design and potential construction interfaces. This includes: • Tripartite Position Statement (see **Appendix B.1** of **REP4-296**) – which sets out jointly developed measures to avoid and/or reduce significant cumulative effects across three key topics: traffic and transport (particularly construction traffic); landscape screening and operational noise • Outline Onshore Substations Operational Noise and Noise Complaints Protocol (see **Appendix B.2** of **REP4-296**) – which confirms that a joint maximum permissible noise level at sensitive receptors has been agreed and apportioned between the three projects • Parallel DCO requirements and protective provisions – to ensure consistent and enforceable cross-project controls are embedded directly with each Project's DCO. The Tripartite Position Statement (see **Appendix B** of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**) explains that it is expected that a joined-up approach to local liaison will be implemented during the overlapping construction periods of the projects to enable stakeholders and the local community to receive coordinated updates and minimise confusion around who is carrying out what activity and where complaints and questions should be directed. Each project will set out its own approach in its control documents (e.g. Code of Construction Practice). Potential measures may include: • Coordination between the communication teams of complaints and enquiries regarding the substation to ensure efficient handling of issues • Coordinated project updates with information from each project • Establishment of a liaison group for communities around the substation location to provide a platform for representatives of the community to receive updates and speak directly to representatives from the three projects • Coordinated provision of construction information, providing detailed information on how the construction activity will be carried out represented by the projects and key contractors. Specifically to Norwich to Tilbury, the Applicant is currently engaging with its Main Works Contractor to develop its complaints procedure in response to the ExA's written question DCO 2.S3 **[PD-023]**. The Applicant will consider and have regard to local authorities' responses to that written question in developing the complaints procedure. The Applicant will subsequently update **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]** which will be submitted at Deadline 6.
T Fairley and Sons [**REP4-375**]	National Grid highlighted that their aviation study was based on government published, peer reviewed data which whilst might have been the appropriate information to use in the absence of an alternative, the seemingly credible interested party clearly provided them with a more appropriate figure upon which to base their assessment, yet they continue to maintain that they have used the alternative figure. They continue to dictate that they know best and not take on board the issues raised which if appropriately assessed now could be more appropriately mitigated	Action 5 (fourth bullet) of **8.5.8 Applicant's Response to Issue Specific Hearing Action Points [REP4-303]** provides the source of its statistics regarding engine failures. The Applicant response also notes that it has been unable to verify the source of the Interested Party's risk likelihood figure.

Reference	Third Party Comment	Applicant's Response
Penny Lang [**REP4-411**]	It is well-known that the disturbance of the ground caused by construction work causes severe damage to the soil-structure, whether by compaction from heavy vehicles, or churning of the soil due to digging, thus destroying habitats. All of this can also restrict successful regrowth and change the water flow patterns.	**7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision B]** sets out key soil mitigation measures to protect soil resources and prevent damage, such as soil compaction. Commitment AS02 in **7.2 Outline Code of Construction Practice [Revision E]** states that land required temporarily for construction will be returned to its former agricultural use or condition, or as discussed with the landowner, where practicable, reducing potential long-term impacts on farming productivity.
Penny Lang [**REP4-411**]	There was much repetition from the Applicant's landscape "expert" about how lattice pylons "disappear at distance". This is simply incorrect.	Lattice pylons comprise a series of relatively slim structures, given the way they are made. The landscape and views can be perceived through and around these structures, albeit they will in themselves form visible new features in the landscape. However, they do not block views as would be the case for a solid structure. Given the relatively slim nature of the steel sections that are used in their construction, their visibility reduces relatively quickly with increasing distance, especially where they are seen against a land or wooded background.

5. Comments on Oral Cases from CAH2

5.1 Applicant's Response to Common Themes Made by Parties at CAH2

5.1.1 Table 5.1 sets out the Applicant's response to the common themes raised by a number of parties during the CAH2.

Table 5.1 Applicant's response to common themes raised by parties during CAH2

Party [PINS ref]	Common Themes	Applicant's Response
C J H Farming Ltd **[REP4-353],** David John Mason **[REP4-389]**	**Strategic Alternatives** Consideration of offshore or undergrounding across the Project as a whole.	The Applicant set out its position on these strategic alternatives in response in Item 5.1 of Table 2.2 in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**. In terms of offshore considerations, the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore alternating current (AC) solution, in line with the National Policy Statement (NPS) EN-1 (2024) and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury project, in line with the transmission and licence obligations. It also assumes that the connection should be largely overhead, as aligned with NPS EN-5 (2024). In terms of undergrounding, paragraph 2.9.21 of NPS EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
Cullum Agri Ltd **[REP4-356]**, D.N. Grady & Sons Limited **[REP4-357]**, Kathleen Lee **[REP4-**407], Whirledge and Nott on behalf of Essex Scout and Guide International Jamboree, Mr and Mrs Bickford, Mr Glyn Cullen, Mr and Mrs Parrish [**REP4-382**], National Farmers' Union [**REP4-420**], Thornbush Energy Limited and H&O Godbold Limited [**REP4-377**], Clarke & Simpson [**REP4-355**]	**Coordination of UK Power Networks (UKPN) and National Grid's Heads of Terms (HoT)** There remains insufficient clarity regarding third-party utility works, including those associated with UKPN including the relationship and coordination mechanisms between the Applicant and utility providers and separate HoTs for each. Further detail is required on the relationship and coordination mechanisms between the Applicant and utility providers, justification for the chosen routes and construction methodologies and practical matters, including drainage, reinstatement, soil handling, and future access arrangements.	In respect of UK Power Networks, the Applicant has sought to ensure a coordinated and aligned approach. UK Power Networks has confirmed that it intends to align its HoTs with the Applicant's format, subject to any specific requirements of its own easement terms. UK Power Networks has also indicated that it will adopt payment principles consistent with the Applicant's published strategy, such that negotiations with Affected Parties can proceed on a comparable basis. This alignment is intended to reduce duplication, simplify engagement for landowners and their agents, and minimise delay in progressing voluntary agreements. The Applicant and UK Power Networks are actively coordinating their engagement activity. Approximately 30% of Affected Parties are subject to both Applicant and UK Power Networks apparatus, and the parties have therefore established regular coordination meetings to review negotiation progress and address interface issues. Joint meetings with Affected Parties and their agents have been undertaken where matters are more complex, and the Applicant remains willing to facilitate further joint engagement where appropriate. Additional steps are being taken to strengthen coordination, including increased information sharing, encouraging UK Power Networks participation in agent group discussions, and ensuring clear communication to Affected Parties regarding the alignment of HoTs and the respective roles of each statutory undertaker. Overall, these measures are intended to provide a clear, coordinated and consistent approach to voluntary land rights acquisition across both organisations, reducing complexity for Affected Parties while maintaining appropriate separation between the respective statutory undertakers' legal rights and obligations. At this stage, UK Power Networks' programme for issuing and negotiating HoTs is being developed alongside its ongoing engagement and is not yet fixed in terms of timing or sequencing relative to the Applicant's programme. The Applicant is currently working with UK Power Networks to develop their ongoing engagement strategy and will provide further updates as the Examination progresses. The Land Rights Tracker was updated for Deadline 4 to show where UK Power Networks will also be seeking HoTs from Affected Parties. This has been updated further at Deadline 5 to show UK Power Networks engagement and negotiations status see **4.4 Land Rights Tracker [Revision E].** In respect of construction methodologies and practical matters (including drainage, reinstatement, soil handling and

Party [PINS ref]	Common Themes	Applicant's Response
		future access), these have been assessed within the Environmental Statement and are secured through the **7.2 Outline Code of Construction Practice [Revision E]** and associated plans. These include measures to manage soil resources, maintain or reinstate drainage systems, and provide appropriate access during and following construction. Further detail on construction methods and site-specific mitigation will be developed by the Applicant and UK Power Networks through detailed design, with ongoing engagement with affected landowners to understand holding-specific requirements and agree appropriate access and reinstatement arrangements were reasonably practicable.
Cullum Agri Ltd [**REP4-356**], T A Cullum Contracting Limited [**REP4-374**], D.N. Grady & Sons Limited [**REP4-357**], Norwich Diocese Board of Finance **[REP4-367],** Kathleen Lee **[REP4-407],** Thornbush Energy Limited and H&O Godbold Limited [**REP4-377**], Nick Jones **[REP4-412]**, Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton **[REP4-346]**	**Poor communication and lack of engagement with Affected Parties (APs)** Some APs have expressed concerns about the lack of engagement on the project.	The Applicant considers that engagement and negotiation activity throughout the Project have been sufficient. This has included of Heads of Terms (HoTs), and continued discussions with landowners and their professional advisers through meetings, correspondence and site visits. The Applicant has also reviewed and, where appropriate, amended its HoTs following feedback from landowners and agents, with updated templates issued to provide greater clarity and consistency across the Project. Engagement is continuing on an individual basis, with the Applicant willing to arrange further meetings to discuss outstanding matters and to explain the HoTs and associated proposals in more detail. Where any queries or requests remain outstanding, these are under active consideration as part of the ongoing negotiation process. Accordingly, the Applicant considers that engagement has been meaningful and proportionate, and that discussions will continue with a view to progressing voluntary agreements with all APs.
Cullum Agri Ltd **[REP4-356]**, T A Cullum Contracting Limited **[REP4-374]**, D.N. Grady & Sons Limited **[REP4-357]**, Norwich Diocese Board of Finance **[REP4-367]**, Kathleen Lee **[REP4-407]**	**Landowner information being spread across different documents** There is a lack of clarity on permanent rights, easements and restrictions. The information provided to date is high-level and dispersed across multiple documents, making it difficult for the landowner to understand the practical implications. It is essential that the Applicant provides a single, consolidated document setting out how these matters will be dealt with together with detailed mitigation measures.	The Applicant confirms that the Project's land requirements are set out across the Development Consent Order (DCO) application and supporting documents, including the **4.3 Book of Reference [Revision D]**, **2.2 Land Plans [Revision D]**, **2.3 Works Plans [APP-017 to APP-024]** and relevant schedules, which together define the nature and extent of rights sought. The detail of how those rights will be exercised in practice is necessarily refined through ongoing design development and engagement with Affected Parties (APs). The Applicant is continuing to engage with each of the APs, including those referenced, to discuss the specific interaction between the proposed rights, construction activities, and the operation of their landholdings. This includes consideration of appropriate mitigation measures, which are secured through the **7.2 Outline Code of Construction Practice [Revision E]** and associated management plans, and will be further developed at the detailed design stage. In respect of the request for a single consolidated document, the Applicant will continue to explore opportunities to improve clarity and accessibility of information provided to landowners as part of ongoing engagement. However, it should be noted that the framework of documents submitted as part of the Development Consent Order (DCO) application is intended to collectively define the rights sought and the mitigation secured, and is consistent with established DCO practice and statute.
Cullum Agri Ltd **[REP4-356],** T A Cullum Contracting Limited **[REP4-374],** Kathleen Lee **[REP4-407]**, C J H Farming Ltd **[REP4-353],** National Farmers' Union [**REP4-420],** Clarke & Simpson [**REP4-355**]	**Concerns about lack of detail about the proposals, impacts and mitigation in the documents provided to landowners** A number of landowners have expressed concerns about the lack of detail regarding the impacts to their property and business.	The Applicant advises that many of the matters raised would be mitigated though commitments made within the **7.2 Outline Code of Construction Practice [Revision E]** and supporting management plans that are secured under Requirement 4 (construction management plans) of the **3.1 Draft Development Consent Order [Revision E]**. Further site-specific information is being provided through the ongoing landowner meetings and will continue as more information becomes available from the Main Works Contractor during the detailed design.
Cullum Agri Ltd **[REP4-356]**, T A Cullum Contracting Limited **[REP4-374]**, D.N. Grady & Sons Limited **[REP4-357],** Norwich Diocese Board of Finance **[REP4-367]**, Kathleen	**Claims that the land take / Order Limits are excessive** Concerns that and the impact this has on the land holding and operations	The Applicant notes the concern regarding the extent of land take, including for pylons, underground cables, haul roads, construction compounds, utility diversions and attenuation features, and the potential effects on agricultural productivity and land fragmentation. These elements form part of both the temporary and permanent works necessary to construct and operate the scheme. Temporary works will be controlled, managed and reinstated in accordance with the Development Consent Order requirements, including measures to protect soils, drainage and farm operations. The Applicant maintains that the extent of land required has been carefully considered through the design process

Party [PINS ref]	Common Themes	Applicant's Response
Lee **[REP4-407]**, C J H Farming Ltd **[REP4-353]**, National Farmers' Union **[REP4-420]**		and is appropriate and proportionate to deliver the Project. Impacts on agricultural land, including loss and severance effects, have been assessed within the Environmental Statement, and mitigation measures are secured through the **7.2 Outline Code of Construction Practice [Revision E]** and associated management plans. Temporary land take will be reinstated following construction, and residual effects are addressed, where relevant, through the statutory compensation framework.
D.N. Grady & Sons Limited [**REP4-357],** Norwich Diocese Board of Finance **[REP4-367],** National Farmers' Union [**REP4-420]**	**Communications with Tenant Farmers** A number of AP have noted that the land is let to a tenant farmer. The draft HoTs state that the landowner is expected to obtain the occupier's consent to the grant of the rights sought by the Applicant. In some cases, the landowner does not consider it appropriate or reasonable to be required to undertake negotiations on behalf of the Applicant to secure rights that go beyond those contained within the tenancy agreement. It is noted that the landowner is prepared to provide consent for the Applicant to engage directly with the occupier to progress discussions and properly address the rights required.	The established policy is not to seek separate Heads of Terms (HoTs) with occupiers and tenants, as National Grid sees those as derivative interests from those who are able to grant the necessary rights, which is in most cases a permanent easement in perpetuity. National Grid seeks that from the freeholder or the superior title holder, and through voluntary agreements, and it requires the landowners to seek the consent of an occupier or a tenant or a mortgage company, as the case may be. The Applicant made clear that it engages and involves other parties, such as tenants and occupiers throughout the process, to understand how the land is used from a practical point of view. However, it is crucial not to conflate engagement with negotiation. So, in effect, the Applicant undertakes engagement, which is a statutory process that is required for all persons with an interest in the land. But when seeking an easement for a right in perpetuity over the land, in almost all cases, the tenant or occupier does not have the power to grant the necessary rights. Therefore, National Grid negotiates with the parties who would be capable to give the rights which are sought and then relies on the landlord to address the legal side through its landlord–tenant relationship, and that is a requirement that National Grid put into both the HoTs and in the voluntary agreements. Examining Authorities have consistently recognised (Bramford to Twinstead Reinforcement, H2 Teesside and the Silvertown Tunnel) that the regime does not require negotiated agreements with every person holding an interest in land and that it is appropriate for applicants to focus negotiations on those who can grant the rights required for the scheme, provided that all persons with an interest are properly identified, consulted and informed in accordance with the statutory framework. Within that context, the combination of diligent land referencing (sections 42 and 44), targeted negotiation with superior interests, comprehensive engagement with other Affected Parties (sections 47 and 48), and clear recording of decisions provides a proportionate evidential basis for demonstrating deliverability through voluntary agreements and, as a last resort, the exercise of compulsory powers.

5.2 Applicant's Response to Oral Submissions Made by Parties at CAH2

5.2.1 Table 5.2 sets out the Applicant's response to the specific issues raised in the oral submissions made by parties during the CAH2.

Table 5.2 Applicant's response to issues raised by organisations during CAH2

Party	PINS ref	Third party comment	Applicant's Response
Boxford (Suffolk) Holdings Ltd	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
Cullum Agri Ltd	**[REP4-356]**	Land Parcels Affected Cullum Agric Ltd 2/2, 2/3, 2/4, 2/5, 2/6, 2/7, 2/8, 7/4, 7/35, 7/5, 7/24, 6/58, 6/59, 6/48, 6/72, 6/78, 6/77, 6/74, 7/26, 7/29, 7/32, 7/40, 7/41, 7/42, 7/46, 7/48, 7/26, 7/29, 7/32, 7/40, 7/41, 7/42, 7/46, 7/48. Whilst engagement with the Applicant has improved in recent weeks, discussions remain ongoing and unresolved. No agreed HoTs or voluntary agreements are currently in place.	Heads of Terms (HoTs) negotiations are ongoing with the Affected Party and the party agent, including meetings on-site to engage with the party regarding practical matters associated with the Project. This includes discussions regarding mitigation and accommodation of works. Another meeting has been offered to be held on-site with both agent and client to continue discussions following the meeting on 5 March 2026. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 13 May 2026. Confirmed next upcoming meeting is 19 June 2026 with the party agent to continue discussions regarding HoTs.
		A number of critical technical issues remain unresolved, preventing a proper understanding of the scheme's impact,	Items a and b are addressed in **7.2 Outline Code of Construction Practice [Revision E]**. Further information will also be provided to Affected Parties as the

Party	PINS ref	Third party comment	Applicant's Response
		including: a. Soils: Insufficient detail on stripping, handling, storage, reinstatement and aftercare b. Drainage: Lack of clarity on protection, diversion and reinstatement of field drainage c. Construction impacts: Limited information on haul roads, compounds and working areas d. Access: There remains uncertainty regarding the proposed access arrangements within the Order Limits, as well as the justification for a particular selected route.	Project progresses through detailed design and as more information becomes available from the Main Works Contractor. For items c and d, **6.4 Environmental Statement Chapter 4 – Project Description [APP-130]** provides detail on the temporary features such as temporary construction compounds, haul roads and working areas used for assessment purposes. Geographic details of both the permanent assets and temporary works are visible on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**. Illustrative examples of the temporary works features can also be found within the **2.6.1–2.63 Design and Layout Plans [REP1-003, APP-042, APP-043]**. The sizing of these features reflects the Limits of Deviation applied to the permanent assets and likewise provides flexibility for the contractors' final detailed design and chosen construction methodology. The haul road is routed to follow the construction works. The crossover bellmouth on this property is located on Church Road (RG-B003) as shown on Sheet 2 of **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section A [APP-033]**. It is sited to align with the construction works, achieve safe visibility splays, minimise the loss of mature vegetation and avoid private residential properties.
		Please refer to the attached plans identifying the route marked A–B C-D and B-C on the respective plans. On inspection, it is not considered feasible to provide access at this location due to the site's topography. This position has been agreed with the Agricultural Liaison Officer during a site inspection on 10 March 2026.	The route labelled A-B, C-D and B-C is in relation to Table 2.2 of **8.11 Approach to Scenarios [Revision C]**, and its use is dependent on on-going third party engagement and agreement. The Applicant notes the concern raised by the Respondent with respect to the proposed crossover arrangement on Tabernacle Lane. 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 Strategic Road Network or Major Road Network and proposed site access points. The proposed PARs in Norfolk are shown in **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section A [APP-313]**. These show that Tabernacle Lane is not proposed to be utilised as an access point, but rather a crossover arrangement as described under paragraphs 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]**, a preliminary design of this location has been prepared by the Applicant and a Stage 1 Road Safety Audit undertaken overseen by Norfolk County Council as the Local Highway Authority. This location therefore is considered to be suitable for the proposed usage.
T A Cullum Contracting Limited	**[REP4-374]**	Land Parcels Affected T A Cullum Contracting 6/47, 6/48, 6/72, 6/52, 6/54, 6/55, 6/56, 6/92, 6/62, 6/85, 6/88 Whilst engagement with the Applicant has improved in recent weeks, discussions remain ongoing and unresolved. No agreed HoTs or voluntary agreements are currently in place.	Heads of Terms (HoTs) negotiations are ongoing with the Affected Party and the party agent, including meetings on-site to engage with the party regarding practical matters associated with the Project. This includes discussions regarding mitigation and accommodation of works. Another meeting has been offered to be held on-site with both agent and client to continue discussions following the meeting on 5 March 2026. The party's agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 13 May 2026. The Applicant has arranged a meeting for the 19 June 2026 with the party's agent to continue discussions regarding HoTs.

Party	PINS ref	Third party comment	Applicant's Response
D.N. Grady & Sons Limited	**[REP4-357]**	Land Parcels Affected 5/30, 5/31, 5/33, 5/34, 5/35, 5/36, 5/37, 5/40, 5/41, 5/42, 5/43, 5/44, 5/45, 5/46, 5/47, 5/52, 5/57, 5/63, 5/65,5/66, 5/67, 5/68. Whilst engagement with the Applicant has improved in recent weeks, discussions remain ongoing and unresolved. No agreed Heads of Terms or voluntary agreements are currently in place.	Heads of Terms (HoTs) negotiations are ongoing with the Affected Party and the party agent, including meetings on-site to engage with the party regarding practical matters associated with the Project. This includes discussions regarding mitigation and accommodation of works. A meeting was held on 26 March 2026 on-site with the party's agent present. The agent attended the Norfolk agent meeting held, with both Fisher German and National Grid in attendance, on 13 May 2026. The Applicant has arranged a meeting for the 19 June 2026 with the party's agent to continue discussion regarding HoTs.
		A number of critical technical issues remain unresolved, preventing a proper understanding of the scheme's impact, including: soil management, field drainage, construction impacts, access (it is unclear why the compound cannot be accessed directly from the working corridor given that the proposed access route would result in the loss of additional productive land and necessitate the removal of further hedgerow), water management and amenity/operations.	These issues are addressed in **7.2 Outline Code of Construction Practice [Revision E]**. The Applicant will continue to engage with the Affected Party on these matters and will provide further detailed information as the Project progresses through detailed design. Temporary land take will be reinstated following construction, and residual effects are addressed, where relevant, through the statutory compensation framework. With regards haul road routeing, this is driven by the need to access from the crossover public highway access point the bellmouth situated south-west of pylon RG28. From the access point the haul road feeds both the material storage laydown area to its west and pylon RG28 and the associated conductor stringing position to the east. The haul road then avoids a straight line to pylon RG27 to utilise the existing gaps in hedges providing access to the four fields, simultaneously minimising works impact to the field in between span RG27 and RG28 which is otherwise largely unaffected (over and above the overhead line oversail).
Norwich Diocese Board of Finance	**[REP4-367]**	Land Parcels Affected 3/7, 3/12, 4/73, 4/89, 4/90, 4/91, 4/96, 4/132 Whilst engagement with the Applicant has improved in recent weeks, discussions remain ongoing and unresolved. No agreed HoT or voluntary agreements are currently in place.	Heads of Terms (HoTs) negotiations are ongoing with the Affected Party and the party agent, including meetings with the agent to engage with the party regarding practical matters associated with the Project. This includes discussions regarding mitigation and accommodation of works. Agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance, on 13 May 2026. Confirmed next upcoming meeting is 19 June 2026 with the party agent to continue discussion regarding HOTs.
		A number of critical technical issues remain unresolved, preventing a proper understanding of the scheme's impact, including: soil management, field drainage, construction impacts, access (there remains uncertainty regarding the location of the proposed access), water management and amenity/operations.	These issues are addressed in **7.2 Outline Code of Construction Practice [Revision E]**. Further information will also be provided to Affected Parties as the Project progresses through detailed design. Geographic detail of both the permanent assets and temporary works and access routes are visible on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]**.
Kathleen Lee	**[REP4-407]**	On behalf of Katherine Lee Land Parcels Affected 7/77, 7/80, 7/81 Whilst engagement with the Applicant has improved in recent weeks, discussions remain ongoing and unresolved. No agreed Heads of Terms or voluntary agreements are currently in place.	Heads of Terms (HOTs) negotiations are ongoing with the Affected Party and the party agent, including meetings with the agent to engage with the party regarding practical matters associated with the Project. This includes discussions regarding mitigation and accommodation of works. Agent attended the Norfolk agent meetings held, with both Fisher German and National Grid in attendance on 13 May 2026. Confirmed next upcoming meeting is 19 June 2026 with the party agent to continue discussion regarding HoTs.
2 Agriculture Growing Ltd	**[REP4-345]**	Land Parcels Affected 9/15,8/66, 8/68, 8/71, 9/8 Agriculture Growing Limited, is the tenant and occupier of a	Discussions are ongoing with the agent regarding the party. The impact is limited to UK Power Networks works and highways visibility splay for which V2 Heads of Terms

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		poultry unit, holding a legal interest in the land affected by the proposed works. No correspondence has been received from the Applicant or any other relevant party. No engagement has taken place to progress discussions. No attempt has been made to address the substantive issues previously raised.	has been issued.
		Our client is a tenant and holds a legal interest in land under the tenancy. The extent of that interest includes any rights reserved to the landlord, and is governed strictly by the terms of the tenancy agreement. At this point in time, it is not known if the tenancy agreement reserves rights sufficiently wide to enable the landowner to enter into a voluntary agreement for the proposed works because it is not clear the exact rights that are being sought. At present, there is no clear framework setting out how the Applicant intends to engage with occupiers; how occupiers' legal interests will be secured; and what is expected of each party. The failure to engage directly with occupiers represents a significant gap in the land assembly process.	The Applicant acknowledges that the Affected Party holds an interest in the land. Please see the common themes section at the start of this document 'Communications with Tenant Farmers'. The Applicant will continue to work with the occupier regarding bio-security matters and any other relevant mitigation.
C J H Farming Ltd	**[REP4-353]**	I have discussed the access route for pylons 161, 160 and 159 with Fisher German and in the meeting their representative said that the access route was not practical and could see the sense of it being on the West of a hedge instead of ripping the hedge out. Fisher German said it would provide clarification on this point following their meeting of 26 February. I've heard nothing.	The Applicant has reviewed the locations of permanent access routes and is arranging further meetings with the Affected Party (AP) to discuss alternatives. There are ongoing discussions on access provisions including crossing points and temporary compound location. Ongoing communications are occurring, with the next meeting, with the Applicant in attendance, currently being scheduled with the agent later in June based on availability. This will continue the Heads of Terms negotiations and discussions on the points raised by the AP, including accommodation of works and mitigation of losses. Discussions regarding accommodation works and special conditions are currently being reviewed internally. The access proposed for the temporary haul road and future permanent access route in this location utilises the existing bellmouth off Roxwell Road that services the Gas Compressor Station. The access then turns east into the field at the existing gap in the hedgerow to minimise impact. The haul road and permanent accesses are then routed accordingly to service the temporary material storage areas, pylons and overhead line works.
		Pylon location has not been undertaken to consider the practicality of farming the land afterwards – especially for my high value row crops (potatoes). This is especially the case with pylon 155. I am concerned that pylon 161 is not located in the most practical position for future farming. I believe it should be in the corner of the field. No reply / explanation. I don't think the Applicant has considered the practical difficulties of dealing with the high-pressure gas line, the existing bridleway and the proposed access from the A1060. Again, I've heard nothing.	The Applicant recognises the potential disruption to established farming practices that may arise, including impacts on cropping regimes, livestock movements, field access, and seasonal operations. These concerns have been thoroughly considered within **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, which specifically assesses both construction and operational effects on agricultural activities. The Environmental Statement identifies measures designed to minimise disruption, such as carefully planning the timing of works, providing temporary access arrangements, and designing accommodation works like crossings, gates, and drainage to facilitate continued farming operations. As part of routeing and siting the Applicant has considered the impact on agriculture operations and where possible has sought to position assets such as to minimise impacts. However, this also needs to be considered alongside impacts on environmental and socio-economic receptors and technical requirements. Therefore,

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			it has not been possible to position assets to edges of fields in all locations. Routeing and siting considerations for the sections between TB155 and TB161 have been considered and may be found in the following documents within the Examination Library: • **5.15 Design Development Report [APP-122]** paragraphs 9.3.1 to 9.3.3 (pages 109–110) • **7.21 2024 - Design Development Report for the Project [APP-359]** paragraphs 5.4.190 to 5.4.193 (page 82–83) • Response to REP1-219 in Table 3.1 (pages 158–159) of **8.8.1 Applicant's Comments on Written Representations [REP2-029]**.
		Fisher German was also going clarify what was meant by 'bell mouth stacking'… off the A1060… heard nothing. The latest plans issued show a second haul road going deep into my property, and across the 'Essex Young Farmers Showground'. At the recent meeting Fisher German said they would provide me with written confirmation as to when / if they would need this and that it was not part of their permanent access rights. I am very concerned about this being a permanent access as it cuts into the Young Farmers Showground and my caravan site. I've heard nothing back.	The Applicant acknowledges that the Affected Party (AP) raised design concerns regarding haul road access into the land which crosses over a bridleway and emergency accesses for the Young Farmers event, with confirmation provided in February 2026 to the AP that the Young Farmer Club emergency access will be maintained. The Applicant further clarifies that no bellmouth stacking is proposed as part of the access arrangements from the A1060, as shown on Page 50 of **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [TBD]**. Page 50 of **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design – Permanent Features [TBD]** further illustrates that no permanent haul roads are proposed in the vicinity of the A1060. This is reflected in the Land Plans presented by the Applicant, with this area shown in Sheet 7 of **2.2 Land Plans – Section F [AS-010].**
		I have requested that there is no soil stabilisation on my ground, I had a very expensive experience of using this method on the farm for a yard and it has caused more problems than solutions. The Applicant is very happy to come and see what has happened where I have tried this method before.	The Applicant notes the landowner's specific request that soil stabilisation is not used on their land, based on previous adverse experience. The Applicant also acknowledges the offer to review the outcomes of earlier use of this method on the holding. The Applicant confirms that soil management approaches, including any use of soil stabilisation techniques, are not fixed at this stage and will be determined at detailed design stage in consultation with landowners. The Applicant will take into account site-specific conditions and landowner feedback when developing detailed construction methodologies. This includes consideration of alternative techniques where appropriate to avoid or reduce adverse effects on soil quality and agricultural productivity.
		Some of the future permanent PRoW sterilises my land and prevents any future use or development, as well as affecting its future saleability. For example, by pylon 155 the route goes directly behind a house and should instead follow the route of the pylons. I have asked repeatedly for this to be changed, no reply.	There are no permanent Public Right of Way diversions proposed at this location. The Applicant is referring to the permanent access routes for the overhead lines. These have been proposed to utilise existing accesses and follow the field boundaries, with access only required for ad hoc surveys, route inspection and maintenance. As this would be used for maintenance and repairs, it would be irregular and infrequent. It could be one or two times a year or may not be needed for 20 years, and as such will be reviewed and agreed with the Affected Party nearer the time, as land use changes over the years.
		Future cropping losses – I am concerned that NG haven't thought about the fact that farmers have to plan months ahead for a growing crop. Saying you'll get crop loss compensation is one thing - but I know from practical experience with my NG crop loss claim in 2024 for drilling test	The Applicant acknowledges the concern regarding future cropping losses and the forward-planning requirements of agricultural businesses. The Applicant recognises that farming operations, including crop rotations, input purchasing and contractual arrangements, are typically planned well in advance and that short-notice access can restrict the ability of landowners to mitigate impacts.

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		holes we never get FULL compensation for our true costs. Decent notice is what is needed – and ideally 12 months before any major physical works start on site.	The current drafting of the Development Consent Order provides for minimum notice periods for temporary possession, which establish a baseline for access. However, the Applicant's approach is not limited to reliance on these minimum provisions. Through ongoing landowner engagement, the Applicant will seek, where reasonably practicable, to provide advance information on construction phasing and timing, with the objective of enabling Affected Parties to plan cropping and other farm operations accordingly. This will be progressed as the construction programme is refined post-consent. The Applicant's intention is to minimise disruption to agricultural activities through reasonable mitigation measures, including discussions on timing of works and access arrangements. However, given the scale and linear nature of the Project and the need to maintain a safe and efficient construction programme, it is not possible to commit at this stage to fixed advance notice periods (such as 12 months) across all locations. Where impacts on standing crops or agricultural operations cannot be reasonably avoided, the Applicant confirms that Affected Parties are entitled to compensation in accordance with the Compensation Code. This includes compensation for demonstrable losses arising from construction activities. The Applicant notes the concerns raised regarding past experience of compensation claims and will continue to engage with landowners and their agents to ensure that claims are assessed in accordance with the established statutory framework and Compensation Code.
		I have a licence and operate a five caravan licensed site within 100m of the proposed route. Nothing has been clear as to what I'm supposed to do during the construction phase, or afterwards when I suspect nobody will want to come to see the rural views.	The Applicant recognises the wider impact on the business as part of the ongoing discussions, including accommodation and mitigation works. Any disturbance / business loss evidenced as a direct result of the Project will be compensated in line with the Compensation Code. A further site meeting has been scheduled for 10 June 2026, with communications ongoing with the Affected Party's appointed agent.
		NG must be made to take soil samples and detailed drone footage of all agricultural land and surrounding landscapes before any works are undertaken. And this information / soil analysis results must be shared with landowners so that an accurate – and far less contested agreement of soil condition / landscape condition can be made when works finish.	The Project includes several mechanisms to establish and manage baseline land condition prior to the commencement of works. The **7.2 Outline Code of Construction Practice [Revision E]** (CoCP) and associated **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision B]** require the establishment of soil baseline information, including soil types, profiles, depths and distribution, supported by Agricultural Land Classification (ALC) surveys and, where necessary, further pre-construction soil surveys. In addition, pre-construction condition surveys (including photographic and descriptive records) will be undertaken for relevant working areas, with corresponding post-construction surveys used to verify reinstatement outcomes. These measures are intended to provide a documented baseline against which land condition can be assessed following the completion of works, and to support the delivery of reinstatement in accordance with the CoCP commitment to return land to its former agricultural use or a condition agreed with the landowner, where practicable. The Applicant notes the request for more detailed and comprehensive baseline recording (including soil sampling and drone-based survey information). The detailed scope and methodology of pre-construction surveys, including the level of soil analysis and form of condition recording, will be refined post-consent through the development of the detailed Soil Resource Plan by the Main Works Contractor(s),

Party	PINS ref	Third party comment	Applicant's Response
			taking account of the specific characteristics of each land parcel and relevant good practice. The Applicant will continue to engage with landowners on the appropriate form of baseline recording, with the objective of ensuring that land condition is sufficiently evidenced to support a clear and proportionate assessment of reinstatement and any compensation due.
		I'm concerned and haven't heard anything from NG about site security. They are effectively building a 180km road from Norwich to London. NG may not come across crime on other projects, but I can tell you that in this part of Essex opportunist crime is very high and we have invested thousands of pounds in gate and CCTV security. I'm very worried that all these access roads which will cut across my land and crime on my farm will go up. They must match my current level of security with CCTV and ANPR cameras on this project 24 hours a day.	The Applicant recognises concerns regarding the potential for increased risk of unauthorised access and opportunistic crime arising from the introduction of temporary access routes and construction activity. The Project will be delivered in accordance with established National Grid policies and construction management measures, which require the contractor to implement a proportionate package of site security controls to prevent unauthorised access. These typically include the provision of secure fencing and hoarding, controlled access points, locked gates outside of working hours, and appropriate management of access to and from the site. Additional measures such as CCTV, alarm systems, security lighting, and site patrols may be implemented where required, having regard to the nature of the works, site-specific risks, and local context. The Applicant confirms that site security arrangements will be determined on a location-specific basis and will be agreed with the relevant landowners prior to the commencement of construction. This will include consideration of existing baseline security measures and local crime prevalence to ensure that appropriate mitigation is in place and that the risk of unauthorised access is effectively managed.
		I have an underground main in three fields but never had any acknowledgement that the Applicant has registered its existence. I have an irrigation abstraction licence point where the works are crossing the River Can – will NG be applying to the environment Agency on my behalf so I can abstract water during the building phase?	Where existing apparatus has not been reflected or acknowledged in previous correspondence, the Applicant will review available records and, where necessary, seek further information from the landowner and relevant utility providers to ensure this infrastructure is appropriately captured and taken into account as part of the detailed design and construction planning process. This information is critical for both avoiding damage during construction and ensuring appropriate protection measures are implemented. In relation to the irrigation abstraction licence point, the Applicant acknowledges that maintaining access to water resources is an important operational requirement for agricultural businesses. At present, the Project commitments include maintaining or reinstating land and infrastructure functionality where reasonably practicable, supported through detailed design and construction planning under the **7.2 Outline Code of Construction Practice [Revision E]** and associated management plans. The Applicant does not automatically apply to the Environment Agency on behalf of landowners for abstraction licences or variations to existing licences, as responsibility for abstraction licences typically remains with the licence holder. The Applicant will engage with affected landowners to understand the location and function of abstraction points, consider how construction activity, including any crossing of the River Can, may affect access to or operation of those points, and implement reasonable mitigation measures where practicable to maintain access or provide alternative arrangements during construction. Where impacts cannot be avoided, any resulting losses would be considered under the Compensation Code. If any temporary disruption to abstraction is anticipated, this would be addressed through site-specific construction planning and engagement with the landowner in advance of works. Existing underground infrastructure will be reviewed and incorporated into detailed design where identified, and ongoing engagement is

Party	PINS ref	Third party comment	Applicant's Response
			intended to ensure that both infrastructure constraints and operational requirements, such as irrigation, are appropriately considered and managed.
		I have had no correspondence with any third-party company; e.g. UKPN where there is work required near pylon 155. Several pylons are located on land where an existing option has been signed for a solar farm. The solar operator, or myself, have had no correspondence.	The Applicant confirms that third-party works (including those undertaken by distribution network operators such as UK Power Networks) are being progressed in parallel with the main Project design and programme. At this stage, engagement by third parties with affected landowners may not yet have commenced in all locations. However, coordination between the Applicant and relevant statutory undertakers is ongoing to ensure that works can be appropriately aligned and delivered. The Applicant recognises the importance of ensuring that landowners are fully informed where third-party works are required on their land. Engagement with Affected Parties, including in relation to third-party infrastructure interfaces, will be progressed as design and delivery requirements are further developed. In respect of land subject to existing agreements with third parties (such as options for solar development), the Applicant acknowledges that these are material considerations. The Applicant is continuing to review such interactions as part of the detailed design and land referencing process. Engagement with both landowners and, where relevant, third-party developers will be undertaken to understand the nature of these interests and to seek to minimise conflicts where reasonably practicable.
		Four pylons (154 – 157) are located in the Minerals Safeguarding Zone – nothing has been explained to us about what will happen with the pylons being located in this area.	These safeguarding zones are extensive and reflect the future potential for these resources to be extracted. However, sites need to progress through a structured planning process and safeguarding does not provide a guarantee of future exploitation. As such the Applicant considers their presence as one of the range of factors in routeing. It is also the case that the small area affected by the infrastructure does not typically preclude exploitation of the minerals resource more generally albeit some restrictions may apply but would be dealt with through normal compensation mechanisms.
		At my last meeting with FG I raised a query as to why they had proposed some badger mitigating in the middle of an arable field. I've still heard nothing.	Land has been included within the Order Limits where there is the potential need for ecological mitigation. This potential ecological mitigation may include the creation of an artificial sett. However, every effort will be made to avoid impacts to main badger setts during detailed design and therefore it is possible that this area will not be needed. Further information will be available following detailed design when the exact impacts and mitigation requirements are known.
		Tree and hedgerow removal and replacement. I have had no acknowledgement that any area needing to be removed and replaced is planted with adequate deer protection. Without it, the local deer population will soon eat them. I hope NG will have a planning condition placed on them / or a restoration commitment to plant AND maintain any replacement hedges and trees for at least five years or longer if required to get established.	The **7.4 Outline Landscape and Ecological Management Plan [Revision E]** notes in paragraph 9.3.2 that reinstatement planting will initially be protected to shield young trees from browsing rabbits and deer during establishment, for example using biodegradable tree/ shrub shelters or fencing. The **7.4 Outline Landscape and Ecological Management Plan [Revision E]** also identifies that the tree and hedgerow planting will be subject to a five-year aftercare period. The **7.4 Outline Landscape and Ecological Management Plan [Revision E]** forms part of the Development Consent Order application and sets out the principal measures that are required to help avoid, minimise, mitigate and compensate (where relevant) for the potential ecological and landscape and visual effects of the Project during and post construction, as per the mitigation hierarchy. Standard mitigation measures are included within **7.2 Outline Code of Construction Practice [Revision E]** and should be read in conjunction with the **7.4 Outline Landscape and Ecological Management Plan [Revision E]**.

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		I have been advised that site specific matters with reference to the draft HoTs will be sorted out in due time, but I cannot understand for example why they have said some of my pylons are in 'arable' production and some 'pasture'. I'm an arable farm and ALL my land is arable. Some may be in countryside Stewardship or SFI, but it's all arable. To have to alter obvious 'mistakes' like this is annoying and does not help the communication and understanding between us.	The land use descriptions included within draft Heads of Terms (HoTs) are informed by a range of baseline data sources, including environmental surveys (such as Agricultural Land Classification), aerial imagery, and desk-based assessments. These classifications are typically high-level and prepared at an early stage of the Project to support engagement and documentation, and may not fully reflect the detailed management or rotational status of individual fields at a given point in time. The Applicant recognises that designations such as 'arable' and 'pasture' may not always align with how land is operated in practice, particularly where land is temporarily in stewardship schemes (e.g. Countryside Stewardship or Sustainable Farming Incentive) or subject to rotational changes but remains part of an arable farming system. The Applicant's approach is that draft HoTs are iterative documents, intended to be refined through engagement with landowners and their agents. Where inaccuracies or inconsistencies are identified, these will be reviewed and corrected as part of that process to ensure that the documentation more accurately reflects the actual land use and farming operations.
Whirledge and Nott on behalf of Essex Scout and Guide International Jamboree	**[REP4-382]**	The current version of the HoTs is not an attractive or sufficiently certain proposal for landowners. There remains a lack of clarity as to whether landowners will, by default, retain their rights to claim under the statutory compensation code; there is no binding commitment to deliver accommodation works; and there is very limited flexibility to agree changes outside the Order Limits. Despite requests no standard form of the deed of easement has been shared, meaning affected parties are again at risk of signing the HoTs without full knowledge of the intended documentation. National Grid has imposed deadlines for the return of Heads of Terms, with some falling as early as the beginning of June, yet the updated draft has still not been produced. We have only very recently had engagement from UKPN, and there has still been no engagement regarding other third-party works, such as the relocation of BT or Openreach apparatus. Despite that uncertainty, our clients are being pressed to sign HoT. Many landowners have sought measures necessary to enable continued operation of their businesses during the works. Whilst we are told by National Grid that these matters can be dealt with, those assurances are not being translated into binding written commitments. It is impossible to advise landowners with confidence to enter into agreements with NGET while such significant uncertainty remains. However, delays in our clients signing in some cases puts the incentive payments at risk, which for some represent substantial sums.	Negotiations are ongoing with regular correspondence between the Applicant and the Affected Party's (AP's) representatives. The most recent meeting with the AP's agent was held on 13 May 2026 with the next scheduled meeting to negotiate further and discuss updates scheduled for 4 June 2026. Notwithstanding the most recent meetings to discuss practical implications were held with Essex Scout and Guide International on 15 May 2026 with the purpose of discussing the AP comments on Heads of Terms issued to them. Comments have been recorded and taken away by the Applicant with the intention of responding to the AP week commencing 15 June 2026.
Whirledge and Nott on behalf of Mr and Mrs Bickford	**[REP4-382]**	Concerned about their home being adjacent to a proposed construction haul route. They are concerned about noise, disturbance and traffic impacts and the associated road traffic measures outside their home. Also ask for justification for the haul route compared with the alternative locations proposed. Household has protected characteristics as defined in the	There are ongoing discussions following the on-site meeting between the Applicant and the Bickfords on 15 May 2026, to explain the level of works proposed in the vicinity of their home. Written confirmation has been issued to the land agent stating that the Applicant does not seek to acquire the subsoil interest in their land holding nor undertake works that abut the boundary of their home. A further meeting will be held in approximately one month as part of an engagement framework with the

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		Equality Act 2010. At present, there is no clear information on the purpose, duration, hours of operation and likely noise and lighting impacts. The special characteristics of this household have not been addressed. It requires a case-specific assessment to discharge its duty.	family. The Applicant is discussing specific accommodation works with landowners and their agents on an individual basis. Where requests require construction design inputs, these requests are being escalated with the Applicant's Main Works Contractor to understand whether commitments can be made at this stage.
Whirledge and Nott on behalf of Mr Glyn Cullen,	**[REP4-382]**	The Applicant acknowledges that the airstrip will need to close and has indicated that it may fund the relocation elsewhere. However, until this work is completed and there are firm and binding commitments that costs would be covered then the objection will remain. The closure will also be a loss to the wider aviation community.	There are ongoing discussions between the Affected Party (AP) and Applicant regarding accommodation works and amendments to access routes. The Applicant is currently reviewing the matters raised by the AP and will provide a formal response to the AP by week commencing 15 June 2026. Version 2 of the Heads of Terms was issued to the agent on 21 April 2026, with request for a meeting to discuss the impact of the works on the airstrip. The Applicant is currently awaiting a response from the AP/appointed representatives as to how they would like to procced. The Applicant is also currently awaiting a response from the AP's representative regarding the offer of a further site meeting.
Whirledge and Nott on behalf of Mr and Mrs Parrish	**[REP4-382]**	They are affected by a pylon, haul route and undergrounding of the UKPN line. The business is already being adversely affected. They are also converting buildings at the farm under a planning permission, which would be affected by the Project.	A meeting was held between the Applicant, UK Power Networks and the Affected Party (AP) on 12 May 2026. The Applicant discussed the impact of works on the holding, mitigation and accommodation of works. The Applicant is currently waiting for the information from UK Power Networks before providing details to the AP. Design micro-siting will be reviewed with the Applicant's Main Works Contractor and results will be provided once an assessment has been carried out. The Applicant is aware of concerns from the AP and the potential impact on existing operation and future planning proposals. The Applicant is supporting the AP with planning issues and engaging on a regular basis to mitigate and manage impact on the land. The parties have jointly appointed a planning consultant to review the current development proposals with a view to mitigating impacts of the scheme and discussions are continuing.
National Farmers' Union (NFU)	**[REP4-420]**	Voluntary Heads of Terms: There are still many issues with the voluntary HoTs and that negotiating voluntary HoTs is one of the tests to be met under the Planning Act 2008. The NFU believe that until the meetings which took place in April a compelling case did not exist to take rights because NGET had not tried to negotiate meaningfully to take the rights through the voluntary heads of terms negotiations. Agents highlighted that the negotiations on the HoTs were not progressing and that Fisher German the agents acting for NGET were stating that no further amendments would be made to the HoTs. Concerns by agents were raised with the NFU as the wording included in the HoTs was not in the detail expected and so not acceptable for the NFU to approve to be signed. Negotiations have greatly increased in the last few weeks, and this is an improvement but we are still a long way off a final set of agreed generic HoTs. NGET have also not explained to all agents and landowners what is happening in regard to negotiations on HoTs and the NFU requested that all agents are informed as the NFU had spoken to numerous agents before the hearing and none of them new about the	The Applicant does not agree that meaningful engagement has not taken place. Engagement has included issuing template Heads of Terms (HoTs) and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through Fisher German to progress both generic and site-specific issues. It is the Applicants view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding. The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level, supported by internal review processes and logging commitments to capture and respond to individual requirements. In respect of the request for clearer communication and timelines, the Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents. With regard to the request not to issue further populated HoTs until a final generic position is agreed, the Applicant considers that continuing to issue and refine HoTs,

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		negotiations taking place with John Galloway. Timelines on the negotiations is requested and the NFU would like NGET not to send out any further prepopulated HoTs to landowners until a generic set of HoTs is agreed.	while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale. The Applicant will continue to proactively engage with the NFU on these matters but does note that the NFU is not engaged as a representative body or appointed agent for all affected landowners.
		The Grantors Land: NGET is seeking to take further rights over land outside of the Order Limits. The area of land highlighted at the present time is excessive for the rights requested. The NFU is requesting NGET to carry out one to one meetings with agents and landowners to agree the areas of Grantors Land which are acceptable. The NFU highlighted that one of the tests is that NGET should only take rights over land which are needed, proportionate and justified. In response John Galloway argued that the test did not apply under the voluntary agreement but the NFU would like to state that the principal should apply and that NGET are only offering sums for pylons as included in their Land Rights Strategy and no more even though rights over land outside of the order limits are being requested.	The Applicant's position is that any rights sought, whether within or outside the Order Limits, are identified based on the requirements of the Project and informed by engineering, construction and operational considerations. The extent of land identified at this stage reflects a precautionary approach to ensure that sufficient rights are available to deliver the Project safely and efficiently, including for matters such as access, working space and maintenance. The Applicant recognises the principle that land and rights sought should be reasonable and proportionate. While this principle is applied formally in the context of compulsory acquisition, the Applicant also seeks to apply it in practice when progressing voluntary agreements. The areas currently identified for Grantors Land represent an initial assessment and are subject to refinement through ongoing engagement. The Applicant acknowledges stakeholder concerns that, in some instances, the extent of land identified may appear greater than required for the rights sought. In response, the Applicant confirms that site-specific discussions are ongoing and that the extent of any land required outside the Order Limits will be reviewed with landowners and their agents as part of the voluntary negotiation process. In respect of compensation, the Applicant notes that payments offered under the Heads of Terms are informed by the Land Rights Strategy. Where additional or different rights are identified as necessary in a particular location, these will be considered through engagement and, where appropriate, reflected in the terms offered. The Applicant agrees that direct, one-to-one engagement is an appropriate mechanism to review these matters. The Applicant and its appointed agents will continue to offer meetings with landowners and agents to explain the requirement for any Grantors Land, review and, where appropriate, refine the extent of land identified; and consider site-specific circumstances in progressing voluntary agreements.
		New Interests: Landowners/farmers do need to be able to carry on letting land on a short term basis and this should be possible on a two year or less FBT with a two-month notice provision. It should not be necessary to include all NGET provisions. This has been agreed in other DCO schemes.	The Applicant notes the NFU's position regarding the ability of landowners to continue to grant short-term Farm Business Tenancies (FBTs) and recognises the importance of maintaining flexibility in agricultural land management during the period leading up to construction. The Applicant's approach to voluntary Heads of Terms seeks to ensure that land use can continue, where reasonably practicable, without placing unnecessary restrictions on normal farming operations. This includes recognising that landowners may wish to enter into short-term arrangements, such as FBTs, to maintain productive use of the land. The Applicant acknowledges the NFU's proposal that short-term FBTs (of two years or less, with appropriate notice provisions) should be permissible without requiring the full suite of standard Project provisions. The Applicant recognises that such arrangements have been adopted on other Development Consent Order schemes

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			and that a proportionate approach may be appropriate where the duration and nature of the tenancy are limited. However, the Applicant must also ensure that any third-party occupation of land subject to Project rights does not: • Prejudice the Applicant's ability to access and use the land when required • Create conflicting rights or obligations or • Introduce risks to programme delivery, health and safety, or compliance with Project requirements. Accordingly, some level of consistency in provisions is required to ensure that occupational arrangements remain compatible with the Project. The Applicant confirms that this matter is being considered as part of the ongoing discussions on generic Heads of Terms. The detailed approach to short-term lettings, including the extent to which simplified provisions may be appropriate, will continue to be reviewed with the NFU and agents.
		Practical Details: Wording covering practical issues like field drainage, soil statements, record of condition, irrigation systems and water supplies are not covered in enough detail in either the HoTs or the Outline Code of Construction. The NFU will submit wording it would like to see included.	The Applicant acknowledges the NFU's position on field drainage, soil statements, record of condition, irrigation systems and water supplies. The Applicant feels that these points are covered sufficiently within the **7.2 Outline Code of Construction Practice [Revision E]** and will be covered in greater detail as the Project progresses through detailed design. The Applicant will review the NFU's suggested wording once it has been submitted.
		Commitments Register: Agents have been raising their concerns over the Commitments Register which we understand covers accommodation works which are agreed for individual farm businesses. On past projects the Commitments Register has been part of the voluntary agreements. This has meant that it is binding and would have to be part of the contract between NGET and their contractors. At the present time NGET are stating to agents that the CR may only be a side letter to the HoTs. The NFU and agents are concerned as to how will the side letter be binding? It is felt that the side letter will need to either be attached to the HoTs or agreed within the Outline Code of Construction so that it is included within the DCO.	The Applicant notes the concerns raised by the NFU and agents regarding the status and enforceability of commitments, particularly in relation to accommodation works agreed with individual landholdings. The Applicant confirms that the commitments are being used as a mechanism to capture and track landholding-specific matters arising through engagement with landowners and their agents, including accommodation works and other site-specific requirements. These commitments are reviewed through an established internal process to ensure they are considered alongside the Project's design, construction and delivery requirements. The Applicant recognises the importance of ensuring that any agreed commitments are clearly recorded and capable of being delivered during construction. The Applicant further acknowledges the concerns raised that, if such commitments are only documented in a side letter, there may be uncertainty as to how these would be secured or enforced. The Applicant's position is that the appropriate mechanism for securing commitments will depend on the nature of the item in question, but the same approach has been adapted as taken on other NGET projects. In practice: • Certain matters may be secured through the contractual arrangements between the Applicant and its contractors • Others may be reflected within the relevant management plans secured through the Development Consent Order (such as the **7.2 Outline Code of Construction Practice [Revision E]** and its subsequent detailed plans) • Site-specific arrangements may be documented through Heads of Terms and any associated agreements. The Applicant confirms that it will continue to engage with appointed agents to clarify how commitments will be secured and delivered, with the objective of ensuring that

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			landowners have appropriate confidence that agreed accommodation works and provisions will be implemented.
		Haul Roads: Requests have been made to re-route the haul road in certain locations as at the present time it cuts through many fields causing severance which will increase the impact on farm operations during construction. This impact could be reduced in many locations if re-routing is carried out. Further agents have raised concerns over the use of soil stabilisation in the construction of the haul road. A request is made to receive further information on the soil stabilisation product, how it works, how it is removed from the soil at reinstatement and what is the impact on crop yields after reinstatement.	The Applicant recognises that haul road routeing has the potential to affect agricultural operations, including through temporary land severance, disruption to field access, and impacts on normal farming practices. The current haul road alignments have been developed through an iterative design process taking account of engineering requirements, environmental constraints, safety considerations and access needs. However, the Applicant acknowledges that these alignments represent a preliminary position and may not, in all cases, reflect the most appropriate arrangement from a land management perspective. Proposed haul road routes will continue to be reviewed through ongoing engagement with landowners and their agents, Site-specific feedback, including requests to re-route haul roads to reduce severance and operational disruption, will be considered where reasonably practicable; and detailed access arrangements and construction methodologies will be refined post-consent, including through the **7.3 Outline Construction Traffic Management Plan [Revision D]** and related management plans. Where re-routing is practicable and does not give rise to unacceptable engineering, environmental or safety constraints, the Applicant will seek to minimise the impact on farm operations through adjustment of haul road alignments or the incorporation of appropriate mitigation measures (such as crossing points or alternative access arrangements). The Applicant acknowledges the request for further detail on the use of soil stabilisation in haul road construction. At this stage, the detailed construction methodology, including the specific materials and techniques to be used for haul road construction, will be determined by the appointed contractor post-consent and set out in detailed management plans developed under the **7.2 Outline Code of Construction Practice [Revision E]**. The Applicant recognises that there is particular interest in understanding potential effects on soil quality and future crop productivity. Further information on construction materials and methodologies will be provided and discussed with landowners as part of the detailed design and pre-construction engagement process.
		Access Routes: Agents have highlighted that random routes seem to have been highlighted for permanent access routes for future maintenance. Many routes make no sense out on the ground, and it is felt they have been designed without a site inspection. Changes are needed to some of the access routes to make sure that future access is acceptable. Concerns raised on numerous occasions but as yet have not been addressed.	The permanent access routes for the overhead line have been proposed to utilise existing accesses and follow the field boundary, with access only required for ad hoc surveys, route inspection and maintenance. As this would be used for maintenance and repairs, it would be irregular and infrequent. It could be one or two times a year or may not be needed for 20 years, and as such will be reviewed and agreed with the Affected Party nearer the time, as land use changes over the years.
		Plans: There are construction plans being taken to meetings by NGET and FG which have a lot of specific detail as to what is happening within the Order Limits. Implications of the works do need to be considered at a practical level by farm businesses. These plans have been very useful in meetings but at the present time are not being left for farmers to consider. A request is made for a copy of these plans to be left after meetings have taken place as the detail is required	The Applicant confirms that during meetings with Affected Parties', Fisher German has been able to show plans from the Applicant's online system via digital tablets to help facilitate discussions. If a request is made by an Affected Party for a copy of what they have seen digitally at a meeting, Fisher German will be able to provide this.

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		to help farmers understand what accommodation works might be needed.	
		Ceres 1. Tritton Farming Partnership The plan below shows access routes to each pylon. These individual access routes cross over land which identified for mineral (gravel) development. A request has been made to move the route of the pylons, if this re -routing is carried out then it will be even more important to change the permanent access routes. NG have stated that they have taken this request to re route the pylons away to consider further and as such no written response has yet been received. Plan submitted.	The Applicant has previously explained in Sections 9.1 and 9.2 of **5.15 Design Development Report [APP-122]** why wider alternative routes were less preferred and has considered how interaction with the minerals opportunity (scenario 6) could be reduced. In this case, the Applicant is proposing to take forward alignment option B for scenario 6. Permanent access rights for ad hoc surveys, route inspection and maintenance can be adjusted as proposed by the Affected Party and indeed we would assume even these suggestions could be adjusted at the time of any future requirement to access the pylon to respond to land uses at the time.
		Brooks Leney Agents. Messrs Hitchcock at Ringshall. Hitchcock There is a good farm track at this location to the south which would make a better permanent access route. NG are already passing over this track to get to RG186. The track is the same length as is being proposed, it is on a more suitable wider track and it does not go near any houses. This change request has been made to NG and FG on many occasions but is not being accepted. A request is being made to NG to explain in detail why this track cannot be used in future for permanent access which will greatly reduce the impact on the farm business. Richard Langton at Wenham Langton Pylon JC27 and JC28 centre pylon. There is a very good farm track (with no hedges etc) on the blue line, but NG has highlighted two permanent access routes parallel to the track going across a field. Langton: Access to JC27 runs around a headland and is next to a good farm track	In each of these cases, the permanent access routes for the overhead line have been proposed to utilise existing accesses and follow the field boundary, with access only required for ad hoc surveys, route inspection and maintenance. As this would be used for maintenance and repairs, it would be irregular and infrequent. It could be one or two times a year or may not be needed for 20 years, and as such will be reviewed and agreed with the Affected Party nearer the time, as land use changes over the years.
		Annex B Examples of Design Change Requests Mountforts Compounds • Preferred approach is for the construction compounds to be relocated to an alternative holding where there are no livestock-related complications. If relocation off the holding is not possible, the compounds should be repositioned within the holding to reduce severance and operational impacts, as illustrated on the plans. • Option 1 – Relocate both compounds to the field known as "Camping Field". This option would: Move the compounds away from the Grade II listed house and the curtilage listed buildings, which have unstable foundations. Avoid impacts on the 500-year-old oak tree. Remove the compounds from the site where planning permission has been granted for a new barn. Keep the compounds out of the front meadows, allowing livestock to remain in a single, connected grazing area. Utilise land that will in any event be unsuitable for camping due to the proximity of the haul road and compounds. Under Option	Following a meeting with the Affected Party, the Applicant is reviewing the interaction with the Farm. Further meetings and feedback will be held to seek to agree a position. A site meeting was held on 2 June 2026 with the AP, with representatives from the Applicant's Main Works Contractor in attendance. The site visit provided and opportunity to discuss the proposed haul road location and compound locations. Accommodation and mitigation discussions are still ongoing following the site visit.

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		1, the haul road could extend further along Dunton Road and access the site via the existing field entrance in the north-west corner (see plan). • Option 2 – Relocate the compound northwards, adjacent to the other compound. This would move activity further away from the farmhouse and reduce the need for construction traffic to turn within the holding. However, it would still be highly disruptive to livestock operations and is therefore significantly less preferable than either full relocation off the holding or Option 1. Mountforts Haul Road • Access from A127, to continue down Dunton Road and turn into fields further up, rather than turning back on self to go past Dunton Farmhouse. If haul road continues to use road in front of Dunton Farmhouse it will need to be protected with track matting or other protection measures, and any damage made good.	
		Annex B Examples of Design Change Requests Fisher Future access: • Remove future access through Oak Farm farmyard. Move to field alongside football pitch. (See 1.2-1.4 of consultation response) Haul Road: • Remove additional haul road (See 1.5-1.6 of consultation response) • Join haul road between TB102 & TB101, removing longer route east of Church Hill. • Use existing farm track to TB104 • Move haul road west of Church Hill further south to avoid going into the village. See plans below. This would use existing access and farm track (See 3.1 & 3.2 of consultation response) • May retain haul road where it is in suitable places. Fisher Pylons: • TB110 – move so all within one field • TB108 – move closer to hedge • TB106 – move closer to hedge • TB105 – move to edge or corner of field • TB104 – move to edge • TB103 – move slightly south into land which is not cropped • TB100 – move west into field not used for crops	The Applicant has responded to this under its response to Fisher **[REP4-401]**, further below in this document.
		Annex B Examples of Design Change Requests Stacey: Requests to NG have been made to reduce the impact of the pylon route on the horse paddocks. Requests have been made for a lot of accommodation works to enable	The Applicant has responded to this under its response to Stacey **[REP4-405]**, further below in this document.

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		this farm to continue operating during construction.	
		Annex B Examples of Design Change Requests Webster : Change the location of the pylons, access routes, haul road etc to reduce significantly the impact on the farm business. NG have given a standard response stating it is not possible to change any of the route. As can be seen in the aerial photographs the impact of the pylons on residential properties is significant and NG have done nothing to even slightly change the location of the pylons which would reduce the impact of the scheme.	The Applicant has assessed alternative routes near Flordon Hall on previous occasions and reported on why these were less preferred in the 2025 **5.15 Design Development Report [APP-122]** in paragraphs 4.2.3 and 4.2.4. The Applicant's position is that the alternatives are longer less direct alignments and whilst noting some reduction in effects to some receptors, identify that these transfer to other receptors. The potential effects on the Grade II* Flordon Hall and other Grade II buildings are reported in the Environmental Statement.
Basildon BESS Ltd.	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
Richard Long Group.	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
Tritton Farming Partnership LLP	**[REP4-379]**	The N-T pylon route has significant impact on the business: including Lowleys Farm Minerals, Chatham Green housing development –and significant devaluation of the farm and its existing housing stock. There are also significant implications for farming operations during and post construction. TFP remain strongly of the opinion that its alternative is much more suitable, cheaper and less impactful on heritage and people and which is more compliant with Holford Rules.	The Applicant responded to the designs at this location during the CAH2. In relation to the promoted Chatham Green development, the Applicant recognises that land within this area has been put forward through the local plan process; however, such proposals are not currently allocated or consented and remain subject to the relevant planning processes. The Applicant has taken account of known planning constraints and development considerations as part of the routeing and siting process, alongside a range of environmental, technical and deliverability factors. The Applicant acknowledges that the Proposed Development may give rise to effects on land use and property; however, compensation for the compulsory acquisition or the effects of the Scheme on retained land is governed by the statutory compensation code. The Applicant continues to engage with the Affected Party to understand site-specific concerns and to explore appropriate mitigation and accommodation measures where reasonably practicable. We continue to engage with the AP and their agent to negotiate voluntary agreement for the rights being sought.
		TFP has made representations and sought meetings with Applicant at every stage of this project. Historically progress is painstakingly slow. The Applicant appears unreasonably slow in responding to questions and are proposing Deadline 7 for resolutions.	Engagement with the AP has been ongoing and proactive, including calls held on 11 May, 18 May and 26 May with the AP's agent, with continued correspondence to discuss land rights, the Heads of Terms, and the issues raised by the AP. This engagement has been focused on ensuring that concerns are fully understood and considered, while also exploring potential mitigation and accommodation measures where possible. Fisher German has continued to make efforts to engage with the agents acting for the AP, with the aim of arranging further site meetings involving the AP and their agents on site to help progress discussions in a constructive and informed manner. However, despite these continued attempts to coordinate a suitable date, no meeting has yet been scheduled by the agents with their client. The latest attempt for contact was 9 June 2026. The Applicant acknowledges that a number of matters remain under discussion. Given the need to consider site-specific technical, engineering and operational constraints, as well as the requirement to align with the evolving design, it is appropriate that these matters are progressed through continued engagement during the Examination period. The reference to Deadline 7 reflects a realistic programme for resolving complex, site-specific issues where further technical input and agreement is required, rather

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			than any lack of willingness to engage. The Applicant remains committed to progressing discussions as efficiently as possible and to seeking agreement at the earliest reasonable opportunity.
		Standard HoTs sent via postal mail and TFP agent has requested soft copies, these have not been received. Generic not specific across and across whole legal across multiple Title numbers and not just land required.	A meeting was held between the Applicant and the agent on 24 April 2026 which included discussion on mineral rights. The Heads of Terms were re-issued to the agent on 18 May 2026, which they have confirmed they have received. A further meeting is being arranged with both agents who represent the Affected Party and is likely to be held mid to late June based on availability.
		The Order Limits were enlarged to accommodate an alternative Route B, in addition to Route A, to reduce, not avoid, mineral and housing sterilisation. In the absence of larger changes to the route proposed by TFP, TFP is supportive of Route B. As the designs have not been finalised, the Order Limits remain enlarged, which is not in TFP interests. TFP has suggested alternative permanent rights routes to the pylons and the Applicant has suggested it made sense and will review this.	The Applicant will progress with Option B of scenario 6 detailed in Table 2.6 of **8.11 Approach to Scenarios [Revision C]**. A number of engagements with the Affected Party have been held with a number of revisions to pylon positions being progressed to seek to avoid or reduce the extent of sterilisation following review. This continues but will ultimately be finalised through detailed design by the Great Grid Partnership to minimise impact where practicable.
		There is a large area near the A131 and away from both pylon routes within the Order Limits. It is not a 'compound' yet it is for construction and access purposes with 'no permanent rights'. This is an important area for TFP as it provides TFP with roundabout access to the new development. Greater clarity is required on this	The Order Limits have been widened to facilitate an alternative haul road off the proposed Chelmsford Bypass new roundabout, should the scheme progress, which would sever the current proposed construction route that follows the overhead alignment to the A131. With uncertainty over timing of works and thus the position of where the 'highway' will actually be some further flexibility is necessary. The status of this scenario is detailed in Table 2.7 of **8.11 Approach to Scenarios [Revision C]**.
		Post construction the farming will be badly affected because of TFP having small fields combined with a 30m drilling system. requires over 100m width for each pylon. Significant number of fields will be affected and become uncommercial to farm.	The Applicant recognises that the introduction of pylons may alter field layout and create operational constraints for modern agricultural practices, including the use of larger machinery. However, the Project has been designed, where reasonably practicable, to minimise permanent effects on agricultural land, including through consideration of pylon siting and ongoing opportunity for micrositing at detailed design stage. The Applicant does not agree that the presence of pylons would necessarily render fields uncommercial to farm. While some localised inefficiencies may occur, agricultural activity can continue around pylon infrastructure, and such effects are typical of overhead line development. Where land is permanently or temporarily affected, compensation is provided in accordance with the statutory compensation framework and Compensation Code.
		HoTs do not cover many other issues including housing of members etc for example affected by route but not in pylons.	The Applicant recognises that the impacts of the Project are not limited to the footprint of pylons or directly affected plots and may extend to other aspects of landholdings and business operations. The Heads of Terms (HoTs) issued to date are intended to provide a framework for the principal rights required for the Project, together with associated compensation provisions, and are supplemented through ongoing engagement to capture site-specific matters. The HoTs are not intended to represent an exhaustive list of all potential impacts or mitigation measures. Site-specific issues, including those affecting residential properties, farm infrastructure, or wider land use (such as interference with occupation or enjoyment), are expected to be addressed through ongoing discussions with landowners and their agents; and these matters may be captured

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			through agreed commitments, mitigation and compensation under the Compensation Code where applicable.
		Compulsory Acquisitions Powers should only apply to required land and be minimised. The SoCG and HoTs should be accelerated so that the Applicant should not rely on CPO powers.	The Applicant confirms that the identification of land and rights included within the Order Limits has been developed through an iterative design process, taking into account engineering, environmental and land use considerations. The Applicant's position is that the Order Limits represent the land reasonably required to construct, operate and maintain the Project. However, the Applicant recognises the importance of ensuring that the extent of land and rights sought is kept under review and refined where appropriate. The Applicant agrees with the principle that voluntary agreements should be prioritised wherever possible. Engagement with landowners and their agents is ongoing with the aim of progressing agreements through Heads of Terms and Statements of Common Ground, thereby reducing the need to rely on compulsory acquisition powers. The Applicant must retain compulsory acquisition powers as a contingent mechanism to ensure that the Project can be delivered within its required programme where voluntary agreements cannot be secured in all cases. This approach is consistent with standard practice for Nationally Significant Infrastructure Projects.
		The Temporary Possession Powers are excessive, especially for road closures. During construction work various roads are closed including Goodmans Lane, Paulk Haul Lane and Boreham Road. This is a disaster for the farming business as the main farm buildings will be land locked by A131, Goodmans Lane and the haul road. Only five fields out of 50+ fields will be able to be farmed if roads are closed during construction period.	Short-term road closures associated with overhead line stringing, construction of highway mitigation works, construction of bellmouth junctions and the open-cut cable swathe are expected on some of the roads, as detailed in paragraph 5.8.10 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. Access will be maintained, and the coordination and planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently.
Brett Aggregates Ltd	**[REP4-351]**	TFP had volunteered alternative routes to NG across its landholding (Lowleys Farm) but these have been ignored. In our representations we've made reference to the NPPF clause 222C, which requires that known locations of specific minerals, resources of local and national importance are not sterilised by non-mineral development. NG need to progress its designs for route B within the Order limits with a sense of greater urgency. No significant progress has been made despite endeavours to do so. Greater clarity is also required on the Easement option terms so that a full appreciation of requirements can be had. For example, working rights/ownership of minerals under the easement strip; access arrangements; working restrictions/requirements in proximity to pylons/underneath cables; what retained rights TFP will have over the easement in general.	The Applicant has previously explained in Sections 9.1 and 9.2 of **5.15 Design Development Report [APP-122]** why wider alternative routes were less preferred and has considered how interaction with the minerals opportunity (scenario 6) could be reduced. In this case, the Applicant is proposing to take forward alignment option B for scenario 6. Permanent access rights for ad hoc surveys, route inspection and maintenance can be adjusted as proposed by the Affected Party.
ScottishPower Renewables (UK) Limited and East Anglia THREE Limited (EA3L)	**[REP4-372]**	East Anglia One (EA1) and East Anglia Three (EA3) share an access route to their onshore substations and drainage systems (SuDS) basin which is critical infrastructure for EA1 and EA3 and provides drainage to both substations. The EA1 and EA3 substations require continuous 24/7	The Applicant is undertaking significant engagement with the respondent over its concerns listed, as noted in the draft Statement of Common Ground between both parties, and working to agree protections within a side agreement that would alleviate these concerns by confirming that the Applicant will provide the continuous access required.

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		access to ensure their operational integrity. The Applicant is: • proposing the permanent acquisition of land that currently forms part of the existing access to the substations; • seeking the ability to create various rights over land; • seeking the ability to create rights over land that, if granted, could prejudice the ability to access both substations, and surrounding infrastructure. For example, the dDCO seeks powers to create rights that would give the Applicant the ability to limit and prevent use of Bullen Lane which is the sole means of access to the substations and gives access to the SuDS basin essential to the operation of both substations. This is in addition to the powers of temporary closure of streets and PRoW contained in Article 16 of the dDCO.	
ScottishPower Renewables (UK) Limited and East Anglia THREE Limited (EA3L)	**[REP4-372]**	As well as these critical operational issues, the DCOs for both EA1 and EA3 contain ongoing obligations relating to landscaping, that the proposed acquisition by the Applicant would render very difficult, if not impossible, to fulfil, potentially placing those developments in conflict with the requirements of their own DCOs. While Requirement 9 of the draft DCO [REP3-004] requires a reinstatement planting plan to be provided to secure the reinstatement of vegetation affected by the Applicant's project, the SPR parties would appreciate express recognition in the Outline Landscape and Ecological Management Plan that this will include the reinstatement of planting being provided under the EA1 and EA3 DCOs.	As confirmed in the Applicant's response to ExA question BIO 2.16, the Applicant has added commitment S07 to **7.2 Outline Code of Construction Practice [Revision E]**, submitted at Deadline 5. This commits the Applicant to engagement with another project where the mitigation / enhancement measures of that other project fall within the Project's Order Limits, to facilitate delivery of both parties' projects. The Applicant maintains that this general commitment is the most appropriate measure as it applies to all other projects in this circumstance, including those potentially to be identified in the Applicant's future update to **6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]**, as well as those where negotiations remain to be concluded. The Applicant also considers this measure most appropriate as it covers mitigation beyond planting.
		There is also a lack of clarity as to what is proposed. Appendix A of the Statement of Reasons lists various work packages for which SPR and EA3 land is said to be needed, but from the Applicant's works plans, that does not seem to be the case. For example, there is reference to requiring numerous plots for construction compounds but it is not at all clear if that is correct. As such, in its current form, it cannot be said the dDCO satisfies the relevant legal tests for compulsory acquisition in the public interest and in particular the tests in section 127 of the Planning Act 2008 which are engaged in respect of these plots, as it would prejudice unnecessarily the operation of an existing renewable energy project, and the delivery of a consented project under construction. The SPR Parties consider these issues can be avoided and therefore the dDCO in its current form is not proportionate. In that context, it is important to recognise and acknowledge the engagement with the Applicant. A draft HoTs for an interface agreement has been provided by the Applicant and there have been exchanges between the Applicant and the SPR Parties, with some clarification on that draft needed from the Applicant, including a plan providing more detail on the	It is unclear which plots are being referring to specifically here. However, it is acknowledged that East Anglia Three Limited are a Statutory Undertaker to which section 127 of the Planning Act 2008 would apply. SPR, whilst the freehold owner, are not a Statutory Undertaker in respect of the EA1 Development Consent Order, as this is operated by TC EA ONE OFTO Limited. As acknowledged in their submission, the parties are working together to seek to agree terms for an Interface Agreement to resolve both East Anglia Three Limited's and SPR's concerns. In the absence of conclusion of such an agreement the Applicant will submit a section 127 submission explaining why there is no serious detriment to the undertaking of East Anglia Three Limited.

Party	PINS ref	Third party comment	Applicant's Response
		works proposed on SPR and EA3 land for the reasons already set out. The SPR Parties' comments on the HoTs have now been provided to BCLP. HoTs for a voluntary land agreement were received from the Applicant on 10 April 2026, and these are under consideration. Any such agreement will require to sit alongside the interface agreement.	
John Stacey	**[REP4-405]**	The line (TB 96-98) will cross over our horse paddock, there will be a construction site on the fence line ,which will mean they will need permanently relocating along with the menage, stables and paddocks. At every opportunity, we have asked to move the line and the closest pylon away from our house and our horses. National Grid has never directly responded to our requests. Our horses will need permanently moving at great expense with re-siting the paddock, stables and menage. During the hearing, the Applicant mentioned that they had moved TB98 from within the horse paddock to just outside it. This highlights NG's lack of dialogue, as the construction site for this pylon is still within the paddock and the noise from the construction will be intolerable for the horses. If the Applicant had met with us, it would have seen that the current proposal offers little to no improvement.	The Applicant responded to this at CAH2 to explain why the route is as shown at this location and why the pylons cannot be located further from the property. TB98 was previously moved approximately 80 m to try to position the pylon outside of the horse paddocks so it was an oversail only; there is limited scope on how much further the Applicant can move the pylon at this location. See **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]** for further details.
		We were told that the UKPN line would run along the existing overhead line around the edge of the fields but is now through our farmyard, which would completely split our farm in half for an extended length of time. We now have met with UKPN and made them aware that the required connection point is not to the south of our house, but at the rear of our garden on the north-west side. Therefore, there is no need for a new cable to be laid through our garden or yard. If the Applicant had engaged with us earlier, submission errors such as this could have been avoided. When we met with UKPN, it was also discussed that a separate easement with UKPN could potentially be agreed outside of the draft order limits, provided both parties agreed and it met NG's requirements.	The Applicant has responded to the best of its knowledge. The Applicant awaits feedback on the specific discussions held by UK Power Networks with the Affected Party and whether or how this changes the specific arrangement previously advised by UK Power Networks.
		Another concern is that farm security as the farm is currently only accessible through an electric gate. The whole road and compound will open the farmyard up.	The Applicant recognises that the introduction of construction access and compounds has the potential to alter established access arrangements and, if not appropriately managed, could give rise to concerns regarding site security and unauthorised access. The Applicant confirms that construction activities, including the establishment of compounds and access routes, will be managed in accordance with the **7.2 Outline Code of Construction Practice [Revision E]**. These include provisions for site security measures, controlled access and temporary fencing around working areas and compounds. In practice, this is expected to include: • The use of secure fencing around compounds and working areas

Party	PINS ref	Third party comment	Applicant's Response
			• Controlled access points to construction areas, with entry limited to authorised personnel • Measures to manage interaction between construction traffic and existing land uses • Ongoing liaison with landowners to address site-specific requirements.
John Stacey	**[REP4-405]**	There are issues with the HoT which the Applicant is expecting us to sign, to allow them to ask for, not to object to any planning application on our land. We also have to accept dewatering. Also, we will have to seek compensation from the utility companies.	The Applicant recognises that these provisions are important to landowners and that clarity is required as to their purpose and effect. <u>Non-objection provisions</u> The Applicant confirms that any provisions relating to non-objection are intended to provide certainty that agreed rights can be implemented without subsequent challenge where voluntary agreement has been reached. However: • Such provisions are not intended to prevent landowners from engaging in the statutory planning process more broadly • The scope and application of any non-objection clause will continue to be reviewed through engagement to ensure that it is reasonable and proportionate within the context of voluntary agreements. <u>Dewatering requirements</u> The Applicant acknowledges concerns regarding dewatering and its potential impact on agricultural land, soil condition and water resources. The inclusion of dewatering provisions within the Heads of Terms reflects the need, in some locations, to undertake construction activities safely and effectively. The Applicant confirms that: • The requirement for dewatering will be determined on a site-specific basis, informed by ground conditions and construction methodology • Any such activities will be subject to appropriate environmental controls and permitting (including engagement with the Environment Agency where required) • The potential effects on land use and farming operations will be considered as part of detailed design and construction planning, with mitigation and compensation addressed where impacts cannot be avoided. <u>Compensation and third-party utilities</u> The Applicant notes the concern that landowners may be required to seek compensation directly from third-party utility companies. The Applicant recognises that this could create uncertainty and additional burden for landowners. The Applicant's position is that: • Compensation under the Compensation Code applies where loss results from the exercise of the Applicant's powers • Where impacts arise directly from works undertaken by third parties (for example, statutory undertakers), the allocation of responsibility for compensation will depend on the nature of those works and the applicable legal framework • The Applicant is continuing to coordinate with relevant utilities to manage interfaces and minimise the impact on landowners.
John Stacey	**[REP4-405]**	During CAH2, I raised the question of haul road speed limits. I found the commitment in the Outline CoCP 'Impose and signpost a maximum speed limit on haul roads and work areas.' Please can the Applicant confirm what the speed limit on the haul road will be, and how it will be monitored and	Paragraph 5.7.9 of **7.3 Outline Construction Traffic Management Plan [Revision D]** states that speed limits are not defined at this stage of the Project and will vary depending on site-specific conditions. These will typically include limits up to a maximum speed of 20 mph. Monitoring and enforcement of speed limits could include:

Party	PINS ref	Third party comment	Applicant's Response
		enforced?	• tracking devices and safety cameras on vehicles owned by the Applicant's Main Work Contractor(s) to ensure that vehicles are driven within the law and any speed restrictions applied to haul roads • code of conduct training for supply chain partners during onboarding This will allow any instances of rule breaking to be recorded and action taken.
John Stacey	**[REP4-405]**	The Applicant is offering a one-off payment of £8,000 on arable land and £6,000 on grassland for the compulsory acquisition of land for each pylon. How has NG arrived at these figures? How has it assessed that this is a sufficient payment, and has inflation been taken into account?	These figures are not site-specific valuations but form part of the Project's established payment framework set out in the National Grid Land Rights Strategy, which applies a standardised schedule of payments for pylons across the Project. Basis of the payments • The payments are derived from the Applicant's Land Rights Strategy, which provides a consistent and uniform methodology for acquiring land rights across transmission projects • The Strategy is designed to: – Ensure consistency and fairness between landowners – Reflect industry practice and comparable National Grid schemes – Support early voluntary agreement by providing clear, upfront indicative figures. • The distinction between arable (£8,000) and grassland (£6,000) reflects a broad differentiation in typical agricultural use and value, applied consistently across the Project. How sufficiency is assessed • The standard payments are intended to provide a baseline, upfront sum linked to the presence of a pylon • They are not intended to represent full compensation for all impacts • In addition to these payments: Landowners may be entitled to statutory compensation under the Compensation Code, including for disturbance, severance and injurious affection; and site-specific impacts are assessed on a case-by-case basis, rather than being fully captured within the fixed pylon payment. Inflation and updating of figures • The Land Rights Strategy and its payment schedule were reviewed and updated in 2024 to reflect current expectations and market context at the time • The Applicant applies this updated framework consistently across the Project.
John Stacey	**[REP4-405]**	When designing the route to comply with EN-1, the requirement is to choose poorer quality soils where possible. As an affected farmer, I would like evidence at what stage poorer quality soils were considered in the route selection process in order to make this claim. Did the Applicant factor in the actual soil classifications, for example that Grade 3a is poorer quality soil than Grade 2, even though both are classed as BMV land? It appears that the Applicant did not consider soils to be important and scoped them out. How do they know that?	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. As set out in **5.6 Planning Statement [APP-085]**, the Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource and on agricultural activities (as set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**). It is nonetheless noted that routeing and siting decisions about the East Anglia Connection Node (EACN) substation were taken in light of a wide range of factors influencing both the site of the EACN substation (factoring in the potential for co-location of the North Falls and Five Estuaries substations) and the effects of the 400 kV connections to the EACN substation as

Party	PINS ref	Third party comment	Applicant's Response
			well as the customer cable corridors from the offshore generation site to potentially co-located substations. Given the predominance of BMV agricultural land within East Anglia and the geographical extent and scale of the Project, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for critical national priority (CNP) Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. It is acknowledged that the Project will result in a loss of BMV land and is therefore contrary to the National Policy Statement EN-1 (2024) and relevant local planning policy. The extent of BMV land across Norfolk, Suffolk and Essex significantly constrains the ability to avoid this particular resource. However, the Applicant considers that the significant benefits arising from this CNP Infrastructure justify the permanent loss of BMV agricultural land.
John Stacey	**[REP4-405]**	For Whiteheads Farm, the magnitude of impact for noise is assessed as low. It is difficult to believe when considering the existing baseline at our property, especially as the Applicant assessed the magnitude of impact as low without mitigation. Looking at EN-1, this should include: • a prediction of how the noise environment will change with the proposed development • impacts during the construction period • impacts during the operating life of the infrastructure • impacts at different times of day, evening and night, and at different times of year • an assessment of the effect on noise-sensitive receptors, including health and wellbeing where appropriate • measures to mitigate noise impacts using best available techniques. What baseline has the Applicant assessed for our property, and what increase in noise levels above baseline is expected at our residence, including duration? What will be the cumulative impact on our property from the haul roads, their construction and use, pylon construction, and the undergrounding of the UKPN line? Could this lead to a continuous effect, and will it be assessed as one combined noise effect when considering the '10 days in 15 days' and '40 days in 6 months' thresholds? When NG carried out the noise assessment, although they concluded impacts were not significant, there is provision for mitigation where thresholds are exceeded. NG propose temporary restrictions and limits on the duration of works. What are the thresholds, will assessments be carried out before works begin, and will mitigation measures be used and monitored at our property as a NSR?	Baseline noise levels in the vicinity of Whiteheads Farm are low, typical of a rural area. This is demonstrated in **6.14.F1 Environmental Statement Figure 14.1 - Baseline Noise Data [APP-262]** page 17, which shows that the property is located away from main transport routes and outside of the Department for Environment, Food and Rural Affairs noise mapping contours. Based on this low noise baseline, the lower thresholds for potential significant adverse effects from construction noise have been used, based on the Category A thresholds from the 'ABC' method described in Annex E.3 of British Standard 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise[14]. The use of the lower threshold, suitable for quiet rural areas, is described in paragraph 14.4.17 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The thresholds for potential significant adverse effects, based on the Category A thresholds, are described in Section 14.4 of **6.14 Environmental Statement Chapter - 14 Noise and Vibration [APP-256]** (specifically Table 14.3). The threshold for potential significant adverse effects during: • Weekday daytime periods (07:00 to 19:00),and Saturdays (07:00 to 13:00) is 65 dB $L_{Aeq,T}$ • Weekend daytime periods (excluding the Saturday period above) and evenings is 55 dB $L_{Aeq,T}$ • Night-times (23:00 to 07:00) is 45 dB $L_{Aeq,T}$. The highest cumulative construction noise level at Whiteheads Farm, excluding mitigation, is 64 dB $L_{Aeq,T}$. This assumes all activities are occurring simultaneously (including the undergrounding of the UKPN line), with worst-case (noisiest) potential task and methods being used, without mitigation. It also includes noise from construction traffic on the haul road, which is predicted to be <55 dB $L_{Aeq,T}$, without mitigation. 64 dB $L_{Aeq,T}$ is therefore a worst-case noise level. For the purposes of the assessment, it is assumed that the duration may exceed 10 days in 15 consecutive days. However, because the weekday daytime noise level threshold is not expected to be exceeded (even based on the worst-case assumptions), this does not constitute

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

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		Whiteheads Farm will be within 200m of the haul road. What is the assessed noise level from the 100+ lorries using the haul road at our property?	a potential significant effect irrespective of the duration. There is potential exceedance of the weekend threshold without mitigation. However, with mitigation this is not expected to be exceeded. Should it be exceeded, based on the detailed assessments to be undertaken by the contractor, including mitigation, temporal restrictions may be put in place to ensure significant adverse effects do not occur. With refinement of the plant assumptions (e.g. the use of quieter methods) and including mitigation measures, noise levels would be lower. Construction noise levels would likely exceed the existing ambient noise level and be audible at Whiteheads Farm. This in itself does not constitute a significant adverse effect, but would constitute an adverse effect. For clarity, noise mitigation measures will be incorporated into all works (including those near Whiteheads Farm), and not only those where the threshold is expected to be exceeded. This is secured via commitment NV01 of the **7.2 Code of Construction Practice [Revision E]**. Commitment NV05 requires that the contractor conduct a detailed construction noise and vibration assessment and update the Noise and Vibration Management Plan, detailing proposed mitigation measures, prior to the commencement of construction.
John Stacey	**[REP4-405]**	What measures are proposed to ensure crossing points are safe, given that horses and riders will need to cross these haul roads? What will the speed limits be at crossing points for footpaths? The Applicant clearly shows that footpaths will be closed without diversion routes being provided. As an affected landowner, whose responsibility it is not to obstruct footpaths, how will these closures be "managed", and what are the plans where no diversion route is available?	Paragraph 4.2.15 of **7.6 Outline Public Rights of Way Management Plan [Revision C]** details how shared routes and crossing points will be managed. This states that construction vehicles on the haul roads at crossing points will be limited to low speeds (nominally 5 mph) at crossing points. Details of the management regimes and measures for Public Rights of Way (PRoWs) are included within Section 3 of **7.6 Outline Public Rights of Way Management Plan [Revision C]**. Temporary closures with no diversion are only used where a section of PRoW becomes 'redundant' during the works due to instances such as other temporary diversions. These types of diversion will be kept to a minimum where possible, with the overall strategy being to use a Temporary Closure (Managed) regime, whereby the PRoWs will be managed and access maintained for the safe passage of PRoW users, or Temporary Closure with Diversions.
John Stacey	**[REP4-405]**	What has NG assessed to be the safe clearance height of the wires across arable fields, to allow agricultural vehicles such as combines to safely pass underneath the cables at their lowest point?	The Applicant's design for the Project is governed by its relevant statutory duties and obligations as set out in paragraph 5.3.50 of **7.15 Design and Access Statement [REP2-020]**. Overhead conductors would have a minimum conductor design clearance to ground of 8.3 m as per the statutory clearance guidance (although in many cases this would be higher) as a result of landform variations and because the minimum is typically towards the middle of the span and is higher closer to the pylon. This allows agricultural vehicles, such as combine harvesters to pass underneath. Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines. Third parties may refer to: • Health and Safety Executive (HSE) specific agriculture information sheet number 8, 'Working safely near overhead electricity power lines' • HSE general guidance HSE GS6, 'Avoidance of danger from overhead power lines' • Electricity Networks Association (ENA) Safety information for safe usage of mechanical plant in the vicinity of overhead power lines, 'Look out, look up!'

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			• Third-party guidance for working near National Grid Electricity Transmission (NGET) equipment, TGN287 • Statutory clearances guidance in Electricity Networks Association ENA TS 43-08. Specifies minimum vertical clearances for vehicles/machines passing below. Including, but not limited to, guidance that irrigators, slurry guns and high-pressure hoses, or similar, should be 30 m from electrical conductors.
John Stacey	**[REP4-405]**	Three of the pylons on our land are not positioned close to field boundaries. This positioning will reduce efficiency due to additional turning around the pylons and likely reductions in yield. What measures has NG used to limit the effects on agriculture?	As part of routeing and siting, the Applicant has considered the impact on agriculture and operations and where possible has sought to position assets so as to minimise impacts. This also needs to be balanced with other impacts (for example on ecology, residential amenity, etc.) and technical considerations. In this case it has not been possible to position assets to the edges of fields.
John Stacey	**[REP4-405]**	Our main issue is the Visual Residential Amenity Assessment (VRAA) and the close proximity of Pylon TB 98. National Grid dismissed our concerns, saying that the VRAA is not breached and that the project is not considered to be unpleasantly encroaching or inescapable, dominant overall in the views from the residents. During the site-specific hearing, the Applicant claimed they carried out an RVAA from the public footpath. The view from the footpath gives only a limited appreciation of the effects of the pylons. When was this assessment carried out from the footpath, and did the rear deciduous hedge still have leaves on at the time? The overbearing effect cannot be properly appreciated from a public footpath located around 50m away. It is also not acceptable for a digital model to be used instead of a true visual representation. Will NG use a *range* of worst-case scenarios within the modelling, and will the visualisations be provided to each affected property owner so their accuracy can be checked by the affected party?	It was considered highly unlikely that access would be granted to each of the individual properties assessed in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]** within the Project timescales. Therefore, to ensure consistency across the assessment, use was made of all available data detailed in paragraph 13.2.11, with fieldwork used to verify this information where necessary. Details on when field work was carried out are provided in paragraph 13.2.14 of **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C].** Worst case scenarios will be illustrated within the additional visualisations for Step 4 properties, whereby the extents of the Limits of Deviation corridor will be shown, and these will be made publicly available via the Planning Inspectorate, following Deadline 5 in **8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations**.
John Stacey	**[REP4-405]**	Looking at the RVAA assessments, along with the more recent response regarding Whiteheads Farm, there appear to be several errors and incorrect claims. 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment – Part 1 [APP-233] The initial assessment description was accurate. Page 87: 'Clear views of the project', 'occasional filtering of views through boundary vegetation, but this would be limited, and visibility would improve in the winter months.' It also stated that moving the pylon 50m away would reduce the magnitude to medium. The next stage was Step 4: Table A13.4.40 – Assessment of likely change to visual amenity – Whiteheads Farm (E8). Initially, this assessment correctly identified that the property would experience visibility of the Project from three directions. However, it then concludes: 'It is only the side elevation first floor windows which would have direct views of the closest pylon, and the spaces associated with these windows are expected to be predominantly used at night-time (i.e. when	The assessment presented in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]** considers overall views of the Project from each property elevation (be these distant or close range views) and then goes on to detail which of these elevations would have the *closest* view of the proposals, therefore experiencing greater effects. A reasonable assumption has been made that the most important views from all properties assessed would be those from the main living spaces which are used during the day.

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		the curtains would be closed, or when light levels restrict general visibility from those windows).' Firstly, we do not close our curtains at night-time in the summer months when the windows are open, and secondly, are NG suggesting that we are restricted to using these rooms only at night? This statement alone would suggest that the RVAA threshold could in fact be breached.	
John Stacey	**[REP4-405]**	8.9.1 Applicant's Responses to First Written Questions LV 1.12 Pages 519–520 Question: Residential visual amenity assessment – Braintree DC LIR. In its LIR, Braintree DC [REP1-148] notes that the RVAA examined visual effects on 10 groups or individual properties within its district. Of these, two were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both cases, the Step 4 assessment concluded that amenity would not be breached. However, the Council expressed concern regarding the visual amenity of E7 and E8, particularly taking into account the LoD. In both cases, the overhead line is adjacent to the residential boundaries. Additional assessment was requested based on the worst-case scenario in relation to the possible LoD. Applicant's Response: 'For E8 (Whiteheads Farm), the worst-case scenario for this property is expected to be the placing of the closest proposed pylon in direct view of the side (south-east facing) elevation…' The earlier assessment stated that the property had visibility in three directions. The newer assessment now states that the front elevation faces away from the project, which is not correct. The conclusion that the RVAA threshold would not be breached due to 'intervening elements of screening' also conflicts with earlier references stating that any filtering of views would be limited and would reduce further during winter months. This latest assessment also introduces a proposed solar farm to the south-west of our property, suggesting it would have a cumulative effect while still resulting in 'minimal loss of the existing green infrastructure network'. This solar farm is around 1km away. If NG consider this claim valid and worth referencing, it again raises serious questions regarding the accuracy and competency of their assessment.	The point regarding the front elevation is noted and the assessment text for Step 4 will be revised accordingly within an update to **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]**. When determining whether the Residential Visual Amenity Threshold (RVAT) would be breached or not, the property is assessed 'in the round'; including the building and outdoor spaces within the property curtilage. The boundary planting is expected to provide some screening of the Project from the rear garden at property E8, but it is recognised that this planting alone would have a limited effect on filtering views of the Project from within the property itself. Additional information regarding cumulative schemes has been provided within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP4-148 to REP4-156]** (Revision B) to understand future baseline conditions and ensure that combined effects from infrastructure projects within the property locality would not cause a breach to the RVAT. In this case, given the expected visual envelope surrounding the solar farm, it was considered appropriate to reference this scheme.
John Stacey	**[REP4-405]**	Looking at 2.16 Trees and Hedgerows to be Removed and/or Managed Plans for Section E [**APP-052**], there appeared to be around 150 individual trees affected. However, NG state in APP-256, Page 15, that within Section E only 8 trees and 1 group of trees are to be removed. On our farm, I have no idea what trees are being replaced or where replacement planting	The document noted in this comment [APP-256] is an error and should be [APP-236]. **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) [APP-236]** provides a breakdown of arboricultural impacts based on quality as per BS 5837:2012[15] and the scoping method. The Applicant confirms that the number of moderate and high-quality trees to be removed in Section E is eight individual trees and one group. The impact to low quality arboricultural features

[15] British Standards Institution (2012) *British Standard 5837: 2012 Trees in relation to design, demolition*

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		will take place. I have inserted the plan of the trees that are to be removed between pylon TB96 and TB97. Are any of the trees in the photo provided included within the "8 trees" or the "single group of trees"? Can NG identify where the map is that shows which trees are to be replaced? If no such map currently exists, can one be provided? This should also indicate which trees are category 1 and category 2 trees.	is shown in Table A13.6.3 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) [APP-236]** and is recorded as canopy cover impacted; it is estimated that Section E has 19,028 m^2 of canopy cover removed. The trees between TB96 and TB97 have been predominantly categorised as low quality, with seven trees of moderate quality unaffected by the Project, labelled as T826–T832 in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]**.
John Stacey	**[REP4-405]**	Working hours Commitment VN01 states that monitoring of noise and vibration is: "To be confirmed by the Main Works Contractor(s) if Project is consented." We have not been provided with any estimates or assessments from NG to justify their claims that extended working hours, outside of the 'daytime' periods identified in BS 5228-1:2009+A1:2014, will not 'directly lead to a significant adverse effect'. To support this claim, detailed predictions and assessments are required to establish whether the predicted level of construction activity, at the distance our property is from the construction works, would cause adverse noise or vibration impacts. The response goes on to reference the ABC method under BS 5228-1:2009+A1:2014 and commitments NV01–NV05 within the Outline Code of Construction Practice. However, despite referencing these documents, NG still have not clearly answered the concerns raised regarding extended working hours, noise thresholds, monitoring, and mitigation measures specific to our property.	As noted in the response above regarding noise, the construction noise assessment presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** indicates that the weekday daytime threshold for potential significant adverse effects is not likely to be exceeded, even when considering worst-case assumptions, and without mitigation. There is potential exceedance of the weekend threshold without mitigation. However, with mitigation this is not expected to be exceeded. Should it be exceeded, based on the detailed assessments to be undertaken by the contractor (as secured by NV05 of **7.2 Code of Construction Practice [Revision E]**), including mitigation, temporal restrictions may be put in place to ensure significant adverse effects do not occur. Such temporal restrictions would form part of best practicable means to control noise impacts, as secured by NV01 of **7.2 Code of Construction Practice [Revision E]**.
John Stacey	**[REP4-405]**	6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4, Viewpoint 5.17: PRoW south of Silver End (Silver End 18) (View Direction 96) This is a visualisation shows the trees that are to be removed shown on the right in the visualisation. The photograph shows well established trees that have been there for at least 30 years. The visualisation includes trees still in place which NG show will be removed on 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section E, page 6. Therefore, the visualisation is not a true reflection as the landscape would be more visually damaged than they have represented due to removal of the trees. I believe the pylons will be more visible than the visualisations show, as in reality, there will be far less tree screening. As this viewpoint is visible from Silver End Footpath 16, the footpath view will be blighted too. Viewpoint 5.17 prow south of Silver End (Silver End 18) This visualisation is the same views but more distant of the six trees that will be removed, unfortunately the Applicant has chosen to leave them in place, it does reduce the impact. Behind the pylon TB97 under the wire lines are more trees that will be removed.	The assessment of visual effects considers effects on the visual amenity of people and is presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The assessment is based on an assumed worse case tree and hedgerow removal, as detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, illustrated in **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A to H [REP4-029 to REP4-036]**, and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** and its accompanying appendices. **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out the methodology for the production of the visualisations, including Viewpoint 5.17: PRoW south of Silver End. The methodology notes in paragraph 13.7.25 that at all viewpoints, the removal of existing overhead lines (third party mitigation works) is illustrated in the photomontages where the change to baseline views would be visible. At selected viewpoints, mitigation planting has been included based on landscape plans, species mix and expected growth heights at Year 1 and Year 15. At selected viewpoints the removal of existing vegetation has been indicated by a dashed outline and semi-transparent hatch around any vegetation planned for removal. Blue wireline overlays in these areas indicate any elements of the Project which may be visible following the vegetation removal. As noted above, whilst the photomontage at Viewpoint 5.17 does not indicate the removal of existing vegetation, the assessment of visual effects fully

Party	PINS ref	Third party comment	Applicant's Response
			takes into account the removals detailed in the documents above.
Richard Langton	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
H&O Godbold Farming Partnership representative Thornbush Energy Limited	**[REP4-376]**	Grave failure of NGET to provide Thornbush Farm with any real or viable offers or options to keep the farm as a going concern and relocate any disrupted access. There has been a lack of genuine engagement and seeking CPO as a first resort rather than last resort.	The Applicant does not agree that compulsory acquisition is being pursued as a first resort. The Project's approach is to seek to secure land and rights by voluntary agreement, with compulsory acquisition powers included within the Development Consent Order application as a contingency measure in line with standard practice for Nationally Significant Infrastructure Projects. The Applicant recognises that, in some cases, generic Heads of Terms may not sufficiently address complex or site-specific issues such as whole-farm viability, access reconfiguration or business continuity. These matters require detailed, landholding-specific consideration and engagement. The Applicant therefore confirms that: • Further engagement has and will be undertaken with the Affected Party and their agent to understand the specific operational requirements of the farm • Site-specific mitigation measures, including options relating to access arrangements and accommodation works, are being considered as part of ongoing discussions • The Project will seek, where reasonably practicable, to avoid or reduce impacts that would materially affect the continued operation of the farm as a going concern, rather than relying solely on compensation. • Since the last meeting on 13 May 2026, there are a number of outstanding actions with the landowner's agent, which the Applicant hopes to discuss at the next meeting. These include preferred crossing points and other accommodation works to mitigate impacts on the farm. • A further meeting was held on 5 June 2026 to discuss these matters, with a number of actions taken away. The Applicant is due to revert on a number of points requested to be included within the HoTs within a Side Letter.
		Proposed alternative designs for the UKPN cables including figures.	In respect of UK Power Networks, the Applicant has sought to ensure a coordinated and aligned approach which pre Development Consent Order submission included an iterative design collaboration process with UK Power Networks. The proposed designs are an outcome of that process. Post statutory consultation feedback the cable routes identified in the Affected Party's response were modified to more closely follow field boundaries and between existing gaps in vegetation. In some locations this was not facilitated as it would overlap with other works required as part of the scheme (e.g. removal of the existing UK Power Networks pylons and construction of the proposed 400 kV pylons) as documented at paragraph 6.1.5 (pages 67–68) of the **5.15 Design Development Report [APP-122]**. Through detailed design and construction, the Applicant and UK Power Networks will continue to engage with the Affected Party to explore the possibility of facilitating additional refinements to the proposed designs, working within the constraints imposed by the Order (if made) and relevant control documents.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	A comprehensive joined up approach by the Applicant, UKPN, BT and the Bramford to Twinstead project and a trilateral or quadrilateral agreement such that the full impacts of the Scheme could be fully understood and mitigated is needed, including providing for continued access for the future use and operation of the Farm. As at 12 May 2026,	The Applicant notes the request for a coordinated approach across utilities. The Applicant has engaged, and continues to engage, with relevant statutory undertakers, including UKPN and BT, as well as those associated with the Bramford to Twinstead project, to understand interactions and cumulative effects and to coordinate design and construction interfaces where they arise.

Party	PINS ref	Third party comment	Applicant's Response
		there remains no evidence that a development agreement has been agreed between the three utilities.	The Applicant considers that appropriate coordination can be achieved through ongoing engagement and interface management between the relevant parties, and does not consider that a single formal trilateral or quadrilateral development agreement is a prerequisite to understanding or mitigating the impacts of the Scheme. The Applicant will continue to engage with AP to develop appropriate mitigation measures, including maintaining access for the continued operation of agricultural holdings where reasonably practicable, taking account of construction requirements and safety considerations.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	As has been expressly noted, the foregoing raises very real issues in respect of a DCO applied for by NGET but that simultaneously desires powers for at least one other utility who is not the applicant and who has not to date evidenced a requirement for CPO powers itself. Further, it will be self-evident that the refusal by the three utilities to agree a development agreement could not in law or fact justify authorisation of CPO powers because the justification would be self-serving – a need created by a refusal to agree. Thornbush refers the ExA (and Secretary of State) to the detailed and evidenced submissions of Thornbush in its Relevant Representations and to which NGET has made no real response, and UKPN and BT have submitted no response or evidence at all.	The Applicant notes the concerns raised and that it responded to this point in **8.4.4 Applicant's Comments on any Further Information/Additional Submissions Accepted by the ExA [REP1-135]**. The authorised development would include works affecting existing utility infrastructure, and the Applicant has therefore engaged, and continues to engage, with relevant statutory undertakers, including UKPN and BT, to understand requirements and manage interfaces. The inclusion of powers within the Order reflects the anticipated need to facilitate necessary works and protect the integrity of existing networks, where agreement cannot be secured or where it is appropriate to do so. The justification for such powers is set out in the Statement of Reasons and Book of Reference and is not contingent on the existence of a development agreement between utilities. Matters concerning commercial or technical agreements between third parties are being progressed separately between those parties as appropriate. The Applicant has responded to representations where possible and will continue to engage with all parties to seek to resolve outstanding issues during the Examination.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	Thornbush Farm is landlocked for access save from the east. The project would sever the eastern half of the Farm from the western half as a result of construction of a north/south haul road over which the draft DCO provides no terms ensuring access from east to west and back again. No access has been offered across the construction area. The location of the proposed new pylons splits the site in two halves meaning access is therefore imperative to ensure the continued farm operations. Our Client understands that the Applicant is proposing to offer three access points across the construction areas, which will allow our Client to continue to access and cultivate the fields. The points of access, timing of provision etc are still subject to further discussion and agreement. However, it remains the case that the absence of a development agreement between the three utilities precludes any agreement by NGET with Thornbush. This is because until NGET agrees a development agreement with the other two utilities, then NGET cannot agree terms of any kind with Thornbush. If no suitable access can be secured across the line of the haul road construction site our Client will necessarily maintain its objection to the Scheme because the viability of the Farm will be destroyed. Absent the ongoing ability of the three utilities to agree terms, a Requirement to ensure the above.	The Applicant is engaging with the AP and their representatives to develop appropriate access arrangements, including the provision of crossing points where reasonably practicable, to maintain the continued operation of the Farm during construction. The number, location and timing of such access points remain subject to ongoing discussion and agreement with the landowner and will take account of construction requirements and safety considerations. The Applicant does not consider that the absence of a wider development agreement between utilities precludes the progression of land access discussions or the agreement of appropriate provisions with affected parties.

Party	PINS ref	Third party comment	Applicant's Response
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	A proposed permanent soil bund is to be situated in the north west part of the farm to the west of Bramford Substation. NGET has previously been authorised to develop a DCO cable line that terminates on the western side of Bramford Substation. Thereby, NGET both knows of that DCO and that it has powers to acquire that land of Thornbush already. NGET proposes to situate a soil bund comprised of good quality soil removed from the farm's land and simultaneously compulsorily acquire the land (of the previous DCO) on which to situate that soil bund. A simpler solution at the outset will have been to reapply the removed soil to the farm's agricultural groundscape and to not seek CPO powers by which to permanently store the removed soil. Our Clients would welcome clarification on whether this is intended to be temporary or permanent. Our Clients have offered NGET the use of excess soil elsewhere on the farm site and it is understood that NGET have indicated they would be satisfied with this proposal satisfied, subject to formal agreement, such that this area will no longer be required to be acquired by NGET for temporary use. Absent the ongoing ability of the 3 utilities to agree terms, a Requirement to ensure the above.	The location, extent and duration of any soil storage areas, including whether provision is temporary or permanent, are subject to ongoing design development and will be confirmed through the detailed design and construction planning process. The Applicant is engaging with the landowner regarding the management and reuse of excavated soils, including the potential for on-site reapplication or alternative storage locations where reasonably practicable. Any requirement for powers over land for soil storage has been identified to provide flexibility to manage construction materials safely and efficiently, and does not preclude refinement or agreement of alternative solutions. The Applicant does not consider that the absence of a wider agreement between utilities prevents the progression of discussions with the landowner on these matters. The Applicant is coordinating with the BTNO Project so that each Projects requirements can be aligned, and the land requirements can be set out clearly to the AP.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	This element relates to the west and south edges of the existing Bramford Substation. The draft DCO proposes to compulsorily acquire land of the farm along those two edges in order to extend the Substation south and west in that location. The relevant Land Plan confirmed that this would be permanently acquired as part of the scheme, to allow for the existing substation to be extended. Somewhat surprisingly, NGET has since most recently confirmed in fact that this land is not necessary nor required and would only be required in a "worst case scenario" depending on the final designs for the new infrastructure. Our Clients welcome this proposed change to NGET's requirements. Further work is said to be being undertaken by NGET on the details of the Scheme. However more certainty over whether this area is likely to be required should be able to be provided by NGET to ensure that the impact can be fully understood. Given how far the Scheme has advanced and NGET being aware that the extension land is already being used for cables from energy infrastructure adjacent to the farm, our Clients are surprised that a certain position is not possible at this stage. Indeed, in law, it is certain. Applying the Prest case, it is clear that the Secretary of State is not entitled to authorise acquisition of that L-shaped area of the Farm because the actual doubt about its being necessary is required in law to be resolved in favour of the landowner. See Prest, affirmed by the Supreme Court in the Sainsburys case.	The inclusion of this land within the Order Limits reflects a precautionary approach at this stage of the design process to ensure sufficient flexibility is retained pending the outcome of ongoing design development. The Applicant has subsequently indicated that this land may only be required in a worst-case scenario and is continuing to refine the design to minimise land requirements where reasonably practicable. The identification of land within the Order Limits does not confirm that it will be required or permanently acquired. The Applicant will continue to progress design work during the Examination and, where appropriate, will update the land requirements and provide further clarity. The justification for inclusion of the land is set out in the Statement of Reasons and will be considered against the statutory tests by the Secretary of State.

Party	PINS ref	Third party comment	Applicant's Response
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	With regards to the Bramford to Twinstead DCO scheme, it appears there has been a clear and fundamental oversight by NGET in terms of the actual overlap between the two schemes and the resulting impact on our Clients' land. Whilst a liaison meeting between all parties was held on 8 May 2026 it remains surprising that it has taken until May 2026 to have such a meeting arranged and for NGET for the first time mid-way through the Examination Period only now to consider the effects of both schemes together.	The Applicant has engaged, and continues to engage, with relevant stakeholders to understand potential interactions between the schemes and to manage interfaces where they arise, including through design development and coordination meetings. A liaison meeting took place on 8 May 2026 as part of this ongoing process and a further meeting is planned to take place on 4 June, and the Applicant is continuing to consider the potential cumulative effects of both schemes as design and construction planning progresses. Coordination between the respective project teams is ongoing and forms part of the iterative design process, which has included engagement with statutory undertakers and other affected parties.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	Thornbush Farm is a going concern whose business literally relies on the soil of the groundscape to create crops for sale. The draft DCO terms and related documents include no clear terms by which to ensure the actual reinstatement of the removed soil to the farm. Unless the removed soil is ensured to be reinstated from the removed stock from that location, the soil quality would be permanently reduced. It is of paramount importance that the soil management plans proposed by NGET are stated in clear terms, are robust and are enforceable, and provide for sufficient recourse available to our Clients where agreed standards are not met nor maintained. It is not acceptable for breaches to be undertaken for convenience to any project such as the Scheme. Absent the ongoing ability of the 3 utilities to agree terms, a Requirement to ensure the above.	**6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** notes that all land required temporarily would be reinstated to its pre-construction condition, including agricultural land grade with all works undertaken in accordance with good practice as set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303], which includes measures for documenting soil stockpiles (such as signing of stockpiles). As such, once land has been returned, pre-construction land use will be able to continue, including local food production.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	Our Clients understand that NGET are proposing to appoint an "Agricultural Liaison Officer" and assert that our Clients can liaise with during the construction phase of the Scheme. Our Clients are firmly of the view that effective communication will benefit both NGET and our Clients, as landowner. However, the absence of meaningful engagement to date by NGET, its failure to disclose relevant facts until after the event (such as the absence of a development agreement), and the evidence that NGET's internal resources do not know what each is doing, evidences that such an Officer will not have sufficient authority to conclude matters with our clients by August 2026 or at all. Whilst the concept is theoretically helpful, our Clients naturally require real assurance that any communication or concerns arising from the Scheme, not just agricultural, can be appropriately handled, communicated and efficiently dealt with and they would welcome confirmation from NGET of any further measures proposed to ensure that dialogue with NGET can and will continue throughout the construction phase of the Scheme. Absent the ongoing ability of the 3 utilities to agree terms, a Requirement to ensure the above.	The Applicant notes the concerns raised regarding the proposed role of an Agricultural Liaison Officer and wider engagement during the construction phase. The Applicant is committed to maintaining effective communication with affected landowners and considers that the appointment of a dedicated liaison function would support this objective. The precise scope, authority and responsibilities of any liaison role, and the mechanisms for managing queries and issues during construction, will be defined as part of the construction planning process. This will include clear communication routes for raising and resolving matters in a timely and proportionate manner. The Applicant will continue to engage with the AP to ensure that appropriate arrangements are in place to address concerns during construction, including maintaining access, supporting ongoing agricultural operations, and responding to both agricultural and non-agricultural matters as they arise.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	The Outline Construction Management Plan contains no relevant or clear terms by which to ensure our Clients' concerns are guaranteed to be met, and instead posit the actual terms exclusively in the hands of the Main Contractor	The Applicant does not agree that the Outline Construction Management Plan (and associated documents, including the **7.2 Outline Code of Construction Practice [Revision E]** fails to provide appropriate control or certainty. The Outline CoCP secures a framework of mitigation measures and environmental commitments that

Party	PINS ref	Third party comment	Applicant's Response
		to consider himself whether or not to do something. There have been various discussions between NGET and our Clients in respect of the construction timetabling and process of the Scheme mitigating the impacts on the operational farm, including an offer to defer installing overhead cables if the same would impact at harvest time. These discussions remain un-concluded. Further discussions in respect of rerouting a haul road (along the edge of the field instead of through the middle of the field) and fencing proposals have also taken place but no more and there remains after over a year of meetings since Spring 2025 no real progress by NGET. However at this stage the negotiations are still at an early stage and any formal agreement in respect of the same is still some time away from being concluded. Our Clients have no real confidence that NGET will suddenly spring into action in the remaining 3 months to 10th August 2026 and conclude terms (not least because NGET cannot yet do so absent a development agreement). Therefore, an application for our Clients' total wasted costs of its Objection against NGET will follow in due course. Furthermore, our Clients are currently trying to engage with NGET and UKPN on what will be, under current arrangements, separate construction plans. These different plans require different access arrangements, different communication routes, and may create potential duplication. This is increasing the workload for our Clients significantly. Absent the ongoing ability of the 3 utilities to agree terms, a Requirement to ensure the above.	must be adhered to during the construction phase, including measures identified through the Environmental Statement and subsequent engagement. These are secured through the draft DCO, which requires compliance with the approved plans and documentation. It is standard practice for outline management plans to set the framework and principles for mitigation, with detailed measures developed post-consent and subject to approval by the relevant planning authorities. This approach ensures that mitigation remains responsive to site-specific conditions at the time of construction while still being secured through the DCO requirements mechanism. The role of the Contractor is therefore to implement measures within this secured framework, rather than to determine whether mitigation is applied. The Applicant acknowledges that engagement has been ongoing with the Affected Persons in respect of construction programming and the management of impacts on agricultural operations, including consideration of seasonal constraints such as harvest. These discussions are part of the normal process of seeking to agree practical delivery measures and are continuing. The absence of a concluded agreement at this stage does not indicate a lack of progress, but reflects that detailed construction programming is appropriately refined closer to the construction phase. Similarly, discussions relating to haul road alignment and fencing proposals are ongoing. The Applicant remains committed to seeking to agree such matters through voluntary agreements where possible. Where agreement is not reached, the Order, together with the certified plans and secured management plans, will provide an appropriate framework for implementation. In respect of coordination with other utilities, the Applicant continues to engage with UKPN and other relevant parties through established forums, including regular coordination meetings, to align approaches where practicable. However, each undertaker is responsible for its own statutory functions and delivery. Notwithstanding this, the Applicant is committed to minimising duplication of engagement and disruption where reasonably practicable.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	Our Clients' land contains a number of watercourses and its subsurface contains an engineered drainage system in surveyed locations. The watercourses and drainage system will be catastrophically disrupted by the proposed NGET works. The Scheme proposals show water being temporarily routed from the construction area to the north of Field E, through the area known as "Block Hills" to the watercourse that runs from there. The water supply to the farmhouse is from a borehole and NGET must do everything to ensure that their proposals will not have any adverse effect on the integrity of the water drawn from the borehole for human consumption. We see this as an extremely important health risk which must be mitigated. We would welcome confirmation from NGET on what investigations have been undertaken to date and what is further proposed by way of investigation to ensure that this water remains safe for human use. Absent the ongoing ability of the 3 utilities to agree terms, a Requirement to ensure the above watercourses and drainage system is reinstated, field	The potential effects on watercourses, field drainage and groundwater have been assessed through the Environmental Impact Assessment and are addressed through a combination of embedded design measures and secured mitigation within the **7.2 Outline Code of Construction Practice [Revision E]** (Outline CoCP) and the **8.2 Drainage Strategy DCO [REP4-186]**. In respect of construction drainage and temporary water management, the Outline CoCP requires the preparation of a detailed Surface Water Management Plan prior to construction. This plan must demonstrate how runoff will be controlled to prevent pollution and avoid adverse effects on surrounding land and watercourses, including through the use of measures such as buffering, treatment and controlled discharge. No discharge to watercourses or drains may take place without appropriate treatment and approval from the relevant authority. The Applicant also draws attention to the commitment to work with landowners to identify and protect existing land drainage systems. This includes the preparation of a pre-construction land drainage design and the reinstatement of affected systems to their current condition, with specialist land drainage contractors involved where required. This approach ensures that field drainage will be appropriately managed during construction and restored following completion. With regard to water quality and private water supplies, the Outline CoCP includes commitments to safeguard surface water and groundwater from contamination during

Party	PINS ref	Third party comment	Applicant's Response
		by field, when works are completed.	construction, including the control of runoff, spills and pollutants. In addition, specific commitments are in place to protect the continuity and quality of private water supplies in the unlikely event that they are affected by the works. The Applicant recognises the importance of the borehole supplying the farmhouse and confirms that further site-specific investigations, risk assessments and monitoring would be undertaken at the detailed design and pre-construction stage where there is potential interaction with groundwater or private supplies. This is standard practice and will be undertaken in consultation with the relevant regulators, including the Environment Agency where appropriate. The approach to construction methods (including any dewatering or groundwater control) will be informed by ground conditions and subject to appropriate environmental controls, permits and regulatory oversight. This ensures that risks to groundwater and potable water sources are identified and mitigated prior to and during construction. The Applicant therefore considers that the existing framework of secured mitigation, combined with detailed design, regulatory approvals and ongoing engagement, provides appropriate safeguards in respect of watercourses, land drainage systems and private water supplies.
Thornbush Energy Limited and H&O Godbold Limited	**[REP4-377]**	A development agreement between NGET, UKPN and BT is absent and no agreement can be reached with a third party. (a) There is no actual need for UKPN to route the distribution cables in the Eastern locations asserted by NGET on its Works Plans because all of UKPN's below ground cables can in fact be routed in parallel along a single route inside the Southernmost area of the land identified by NGET for UKPN cables. Further, contrary to the NGET plans, UKPN cannot turn their cables through 90 degrees and they must be curved at the turns; (b) There is some degree of urgency to ensure the work is completed and construction was desired to start in Spring 2027. Our Clients have been advised to continue to farm and cultivate the land in case there is any delay to that timetable. Our Clients should be updated regularly and in advance of any construction start dates and the programme for completion of construction to ensure that the Farm's operations are not unduly or unnecessarily frustrated by late notice start dates; (c) Soil Management (see above) is acknowledged by UKPN as being of critical importance to the farming operation; (d) Closure of access along existing public rights of way should not be necessary. We require further confirmation and clarification of the same. Our Clients request clarification from UKPN on the depth of cabling to ensure that the areas of underground cables do not sterilise the relevant land for farming use.	The Applicant acknowledges the concerns raised regarding coordination between NGET, UKPN and other utilities. Engagement between the relevant undertakers is ongoing through established coordination forums to manage interfaces and, where reasonably practicable, minimise impacts. However, each undertaker remains responsible for the design and delivery of its own infrastructure, and detailed design will continue to be progressed post-consent in accordance with the secured plans and requirements. The UKPN infrastructure shown on the Works Plans is indicative and identifies the corridor within which the works may be carried out. The detailed route, including alignment, curvature and installation methodology, will be determined at the detailed design stage, taking account of engineering requirements, ground conditions, safety standards and engagement with affected landowners. The Applicant and UKPN will continue to engage with Affected Persons to consider reasonably practicable refinements within the limits of deviation. The Applicant recognises the importance of providing certainty for ongoing agricultural operations. Although the Programme remains subject to refinement, the Applicant will continue to engage with landowners ahead of construction to communicate anticipated timings and sequencing of works. This will include providing reasonable notice of access and construction activities through established communication protocols to minimise disruption to farming operations where reasonably practicable. The importance of soil resources is also recognised. Soil handling, storage, reinstatement and aftercare will be managed in accordance with the Outline Code of Construction Practice and the Outline Soil Resources Plan, secured through the DCO requirements. These plans will include measures to protect soil structure, minimise compaction and ensure appropriate restoration following construction. Public Rights of Way will be managed in accordance with the Outline Public Rights of Way Management Plan. Temporary closures or diversions will be used only where necessary for construction safety and will be implemented in line with the approved plan and relevant statutory procedures. The Applicant will seek to minimise disruption and maintain access wherever reasonably practicable.

Party	PINS ref	Third party comment	Applicant's Response
			The detailed specification for cable depth will be confirmed at the detailed design stage in accordance with relevant engineering standards and safety requirements. The Applicant notes that underground electricity infrastructure is commonly designed to allow the continuation of agricultural use above it, and reinstatement will return the land to its pre-existing or equivalent agricultural condition, subject to the nature of the works carried out. The Applicant considers that the existing framework of secured plans and ongoing engagement provides an appropriate mechanism for addressing these matters. It will continue to engage with Affected Persons and relevant utilities to refine the proposals and minimise impacts, and does not consider that additional requirements are necessary at this stage. The importance of soil resources is acknowledged. Soil handling, storage, reinstatement and aftercare will be managed in accordance with the Outline Code of Construction Practice and the Outline Soil Resources Plan, which will be developed at the detailed stage and secured through the DCO requirements. These plans will include measures to protect soil structure, minimise compaction and ensure appropriate restoration following construction. The management of Public Rights of Way is addressed through the Outline Public Rights of Way Management Plan. Temporary closures or diversions will only be implemented where necessary for safety during construction and will be managed in accordance with the approved plan and relevant statutory procedures. The Applicant will seek to minimise disruption and maintain access wherever reasonably practicable. The detailed specification of cable depth will be determined at the detailed design stage in accordance with relevant engineering standards and safety requirements. The Applicant notes that underground electricity infrastructure is commonly designed to enable the continuation of agricultural use above, and reinstatement will be undertaken to return land to its pre-existing or equivalent agricultural condition, subject to the nature of the works undertaken. The Applicant considers that the existing framework of secured plans and ongoing engagement provides an appropriate mechanism for addressing these matters. The Applicant will continue to engage with the Affected Persons and relevant utilities to refine proposals and minimise impacts, and does not consider that additional requirements are necessary at this stage.
Nick Jones	**[REP4-412]**	We are subject of land take for pylons TB164 and TB165 The alignment should not route through Green Belt west of Chelmsford when white land is available to the east and if it were accepted that there is no alternative then it must be underground in the Green Belt, as it is in the Dedham Vale National Landscape. If the scheme is to be built overland, our solution is a relatively minor realignment of the pylon line between the A1060 and A414 or TB160 to TB167 involving a straightening of the line that moves TB164 a little to the east without adversely impacting others. Schematics were provided to Grid two years ago no response – provided copies of figures.	The Applicant set out its position on strategic alternatives in response in Item 5.1 of Table 2.2 in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**. In terms of undergrounding, paragraph 2.9.21 of National Policy Statement EN-5 (2024) says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape. Adjustment of TB164 and other pylons is constrained by two pipelines amongst other considerations. The proposed changes transfer effects as set out in **7.21 2024 - Design Development Report for the Project [APP-359]** from paragraph 5.4.190.
		The construction access and permanent rights appears to have been a desk based exercise and not thought through on the ground. We have SUDS near gas pipeline, pylons wiping	A meeting was held with the Affected Party (AP) on 25 February 2026. This mainly discussed accommodation works and minor design changes, which were passed back to the Applicant to review.

Party	PINS ref	Third party comment	Applicant's Response
		out hedgerows and across land ownership boundaries and a long term access that is unworkable.	A meeting was held with the AP on 08 June 2026 to continue discussions and further understand the specific accommodation works on site. The AP discussed the alternative route put forward and suggested some micro-siting of pylons. The Applicant will revert with further feedback.
		We have cooperated with numerous surveys but been declined the findings contrary to provisions of the license.	The Applicant acknowledges that access has been granted to facilitate several surveys under licence. The Applicant seeks to share survey findings in accordance with the relevant licence provisions and will continue to review any outstanding requests for information on a case-by-case basis.
Jeremy Fisher Faulkbourne Estate	**[REP4-401]**	The Faulkbourne Estate is amongst the most affected land holdings in Essex and yet we have had no direct interaction, engagement or feedback from National Grid and limited commentary from the agents, Fisher German. Despite our repeated attempts to engage, NG have simply continued to threaten us with Section 172 Notices and the Development Consent Order. Despite our concerns, we have permitted entry under Licence to National Grids' contractors to enable them to undertake both non-intrusive and intrusive surveys, including GI boreholes and land scrapes through growing crops. NG have continually refused all attempts to coordinate their work/contractors so that we limit damage to crops and the soil structure.	The Affected Party (AP) has been in communication with Fisher German from the beginning of the Project, with meetings held at each opportunity during the consultation stages. A meeting was held on 24 February 2026 with the AP's original agent representative for Heads of Terms (HoTs) discussions. The AP also engaged with Fisher German at the CA hearing to discuss the setup of future meetings. Most recently, a meeting was held on 2 June 2026 at the Faulkbourne Estate between the Applicant and the landowner (and the landowner's newly appointed agent) to discuss the impacts on the land holding. The Applicant has taken away various actions and will review these before responding. The AP's agent representative has since changed since CA hearings. A meeting has been arranged with the AP and new representative on-site for 2 June 2026 to restart HoTs discussions. The Applicant will also be in attendance at this meeting. Wherever possible the Applicant's main works contractors work with the landowner to plan works to mitigate losses and all evidenced losses will be compensated. Agricultural Liaison Officers have been introduced to be the point of contact for any future ground investigation surveys to ensure that there is a clear communication channel and to liaise with the landowners and contractors. Concerns regarding soil management plans were raised by the landowner and their agent at the meeting on 2 June 2026. The Applicant advised that the wording within the template HoTs would be updated to provide further comfort on this point.
Jeremy Fisher Faulkbourne Estate	**[REP4-401]**	In 2024, we set out detailed suggestions of moving pylons within the proposed Order Limits on the Estate so as to minimise both the impact on the farm and the houses of Faulkbourne Village. We sought to straighten the kink in the route (between pylons TB102 and TB109) to reduce the number of pylons, whilst still retaining the line over the Estate. We received no response nor explanation as to why the suggestions were not sensible and no changes were made to the route. In 2025, we made detailed suggestions for a variety of alternatives routes for the haul roads and access points, whilst also producing detailed maps and precise coordinates for moving pylons within fields so as to minimise the impact on the farm and the houses of Faulkbourne Village. We drove representatives of Fisher German along the route to explain why we sought these changes and they made detailed notes on their ipads, commenting that each was very sensible but, again, we received no response or explanations as to why these proposals could not be adopted and no changes were made to the route or NG's wider requirements.	Alternative pylon locations and pylon micro-siting was discussed at the meetings on 24 February 2026 and 02 June 2026. The Applicant will respond on these points with initial feedback on 05 June 2026.e Accommodation works have been discussed, such as crossing points, however more detailed discussions will be held with the landowner and their agent, once pylon micro-siting discussions have concluded. For references to previous responses on siting and routeing of the pylons see pages 17 and 18 of **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**. In summary the Affected Party's (AP's) requested changes to the pylon route cannot be achieved without transferring effects elsewhere. With regards to the alternative haul road alignments and access proposals, we thank the AP for their suggestions and would refer the AP to Reference Nos 9-6.125, 9-6.126, 9-6.127 and 11-6.27 in **5.1 Consultation Report [APP-066]** which provides responses to these. In summary for the Site Access Points, we have adopted changes where practicable and safe to do so. However, following the siting principles detailed within Section 5.5 of **7.3 Outline Construction Traffic Management Plan [Revision D]**, not all suggestions have been adopted. This section states that: *'Site access points have been assessed based on site-specific constraints and highway safety considerations. The locations of the site access points on the public*

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		On 24 February 2026 Fisher German invited us to a meeting and again made detailed notes on their ipads, We received no response or explanations as to why these proposals could not be adopted and no changes were made to the route or NG's wider requirements.	*highway are generally close to the underground cabling and overhead line construction corridors. The most suitable location for the site access point, and access to the haul roads, has been determined with consideration of road geometry, junction visibility and other site-specific constraints. Locations have, where appropriate, been chosen to minimise the impact on trees and hedgerows. Existing land/field accesses have been used where they are considered to be suitable locations as determined by the above assessment criteria.'* Additionally, the haul road routeing is impacted by the requirement to connect from these access points to the overhead line pylons. Where possible, this alignment of the haul road has been routed to follow existing tracks, but in some instances this was unviable due to the positioning of pylons.
Jeremy Fisher Faulkbourne Estate	**[REP4-401]**	I have attached a series of photographs to illustrate some specific examples of our suggested changes. • We have wanted to discuss moving the main East/West haul road through Oak Farm, so it uses existing tracks and avoids traffic through the village. • We have suggested using a large existing gate approximately 30m further north of the entrance rather than their proposal to squeeze through a narrow gap between let commercial let buildings PICTURE [1&2] within the farmyard. • We have suggested using a large existing gateway, with a safe turning entrance immediately opposite Oak Farm, and existing farm tracks and concrete roads to become the haul roads to the West for pylons TB104-115. • We have wanted to discuss removal and relocation of a proposed haul road that forces traffic off a dangerous hill with a blind entrance in the village, down past rented cottages that will become unlettable and which are outside the Order Limits for the pylons PICTURE [5 &6]. 9. 10. 11. 12. 13. 14. • We have wanted to discuss moving Pylon TB100 approximately 50m to North East to accessible wasteland which will neither affect the arable land nor nearby houses and will reduce traffic [PICTURES 7 & 8] • We have wanted to discuss moving the Pylons TB105-106 to the edge of the large square field to reduce their impact on the cropped area. As a result of the combination of the 50m x 50m bases of the pylons and the 38m spray booms, a 126m strip of grade 2 land will effectively be sterilised through our largest field. Moving the pylons closer to the edge of the field will reduce the area lost to 50m. • We have wanted to discuss moving TB110 approximately 20m NW so that all of the pylons and undergrounding are in one field, again seeking to minimise its' impact on future cropping and management of the land.	For references to previous responses on siting and routeing of the pylons see pages 17 and 18 of **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**, in summary the Affected Party's requested changes to the pylon route cannot be achieved either without transferring effects elsewhere. An example being the alternative at TB98 to TB113: '*the suggestion in the feedback would not lead to the removal of the kink to the south of the group of properties at Maltings Farm but would switch it to pass to the north of these properties. Whilst noting the assumed opportunity to reduce effects on agricultural activities this would only be achieved by increased effects to residential properties on the southern edge of White Notley reducing consistency with the Holford Rule Supplementary Notes'* (Ref no. 9-6.109 of **5.1 Consultation Report [APP-066]**). Furthermore, with regards moving TB110 further north: '*National Grid notes the respondent's feedback. Moving TB110 into the same field as the Cable Sealing End (CSE) compound would compromise the safe distance between the existing 400 kV overhead line, the gantry and the new tower. Moving or splitting the Cable Sealing End (CSE) compound wouldn't resolve this. Alternative locations for the CSE compound have been assessed, however the current location is preferred in terms of technical feasibility and safety and given that others required a longer length of cable between them is also at lower cost'* (Ref no. 11-6.29 of **5.1 Consultation Report [APP-066]**). The Applicant acknowledges the concerns raised around the construction access and haul roads. The Applicant remains committed to ongoing engagement with the Estate to discuss construction access, phasing and mitigation measures as the Project progresses towards detailed design, with the objective of minimising disruption to the Estate. The Applicant provided an overview of the principles behind the haul road design in TT 1.11 of **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**. With regards the alternative haul road alignments, previous responses can be found at Ref Nos 9-6.125, 9-6.126, 9-6.127 and 11-6.27 in **5.1 Consultation Report [APP-066]**. In summary, some changes were made where practicable and safe to do so, but the public highway access points are governed by the relevant safety and design standards, including visibility splays. These rendered some of the alternatives unsuitable. Thereafter the haul road needs to tie in with these access points and then is aligned to service the overhead pylons it is required to access for construction. Where possible these were tweaked in line with existing tracks but in some locations this was unviable due to the positioning of pylons. An example being: '*moving access to nearer Oak Farm on Church Hill for both works, east and west, has been assessed as not being practical,* [due to the carriageway geometry] *and would add significant length to the haul road, whilst impacting*

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			previously unaffected fields, to get to the works' (Ref no. 11-6.27 of **5.1 Consultation Report [APP-066]**).
Jeremy Fisher Faulkbourne Estate	**[REP4-401]**	Importantly, we have wanted to contest the appropriateness of NG seeking to compulsorily acquire 35 acres of Grade 2 agricultural land to facilitate an area for the creation of Biodiversity Net Gain Credits (BNG) to offset the impact of their scheme. I have concerns as to their ability to manage the land, which will be on the edge of the Estate and feel that it is inappropriate for them to be compulsorily acquiring land on which they can then sell any surplus units at a profit. We would like to create the BNG units in more appropriate locations on the Estate which we would then manage and sell to NG at market value. We have the incentive to create the BNG units properly as poor management affects adjacent land. This is not what compulsory purchase was designed for.	Environmental Areas are proposed around the Fairstead Cable Sealing End compounds (Tilbury Side and EACN Side) to provide landscape and visual mitigation while also offering ecological value. They are therefore multi-functional areas where landscape and visual mitigation and biodiversity gains could be achieved together and not provided solely for biodiversity gains. As is explained in Section 3 of **4.1 Statement of Reasons [Revision D]**, the Applicant is seeking powers to compulsorily acquire land and/or rights to enable the delivery of environmental mitigation measures. Where possible, such mitigation will be taken into account for the purposes of the Applicant's BNG calculations for the Project. Further details can be found in **8.5.9 Applicant's Response to Compulsory Acquisition Hearing 2 Action Points [REP4-304]**.
Mr and Mrs Lanham	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
Mr Paul Lanham	**N/A**	Did not provide an oral summary at Deadline 4.	N/A
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	National Grid proposes to dissect our operational family farm, which we estimate would result in roughly 10 out of 16 productive arable fields being rendered inaccessible or unfarmable during National Grid's possession and occupation. Our farm contractor—who has no land directly taken—stands to lose around 400 acres of workable land just on our holding. This puts into question whether it is even viable to farm the remainder of our farm, because the business relies on economies of scale.	A meeting was held on 19 May 2026 with Applicant representatives and the Affected Party (AP) to discuss the Heads of Terms (HoTs) and accommodation works to mitigate impacts where possible. The AP has two land agents and both were in attendance. The AP is to provide feedback to Fisher German regarding construction access arrangements to retain land and for his contractor to continue to farm the land. From this, accommodation works and implementing crossing points can be reviewed at reasonable locations. Design elements raised were taken back the to Great Grid Partnership for review. The Applicant is reviewing practical implications, permanent and temporary access and design elements. A further meeting was initially scheduled for 30 June 2026, but requires re-scheduling as a result of the landowner's agent no longer being able to attend. A meeting is proposed to discuss HoTs once V3 has been issued.
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	Alternative routes shown in the development plan, specifically fig 9, were never visited on our farm or on neighbouring landowners' land—even after we invited National Grid and Fisher German at an early stage and submitted multiple written consultation responses. How can the Applicant credibly conclude those options "don't work" without doing the on-the-ground work with the people who know the land? And if they have done that work, then it should be explained clearly, with evidence.	The consideration and assessment of the merits or otherwise of alternative routes is undertaken initially using available desk based information. In particular circumstances, additional information may be gathered through site reconnaissance from publicly accessible areas and in some cases it may be necessary to arrange for landowners to be identified and contacted to complete relevant surveys. In this case the extensive presence of ancient woodland is well documented and is a key factor in the decision making. There was no need to undertake field surveys to confirm this nor to respond to the information provided by the Affected Party regarding coppicing parts of the woodland. Discussions with Natural England have supported our position. Feedback from the consultation meetings held with the Affected Party were provided to the Applicant, responses of which were included in the Consultation Report and Detailed Design Report (for references see pages 28 and 29 of **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**).

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Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	On non-intrusive survey licences: we signed them and, despite that, notices were still issued to undertake surveys. When we requested the underlying survey information, it was withheld despite repeated requests to Fisher German. When it was eventually provided following a Freedom of Information request, it arrived in an unreadable format via links that expired rapidly. That is not open engagement. It is also concerning that the applicant is now seeking to remove information-sharing obligations from the non-intrusive and intrusive licences currently under discussion.	The returned signed licences were deemed to have been returned in an unacceptable format by the Applicant's legal team due to comments made on the licence by the Affected Party (AP), therefore access was taken under notice due to this. Survey data was provided in the raw form following the Freedom of Information request. Following the on-site walkover meeting where an Agricultural Liaison Officer was present, continued communications have occurred with the AP and terms have now been raised for a survey compound licence that has been agreed due to start w/c 25 May 2026. The clause relating to the provision of survey information was removed as it became apparent that due to a variety of factors the Applicant was unable to honour the release of survey information as per the specific terms of the licence. The Applicant is not averse to supplying survey information to parties who have entered into a licence agreement for surveys on the project. However, the timescales for providing the information are unpredictable. It is therefore the Applicant's preference that the provision of survey information is not a requirement of the licence, nor constrained by specific timescales. The Applicant will endeavour to supply survey information to specific landowners who request it, where it is practical to do so.
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	No negotiation on individual HoT has taken place, including the extent of the option area. Which in our view, currently worsens land take liability and adds serious indirect cost implications through severance and injurious affection—none of which appears to have been properly accounted for including via practical solutions. I am informed template HoTs are being discussed with our agents under the overarching threat of CPO powers, like the licenses, with no room for adaptation to pragmatic, case-by-case solutions. "One size fits all" is not an acceptable approach when seeking compulsory powers over complex rural and diverse landholdings.	The agent representing the Affected Party (AP) has attended meetings to discuss the Heads of Terms (HoTs) and multiple requests for site meetings with the AP have been made via the AP's agent. Most recently, a meeting was held on 19 May 2026 with the AP and their representatives to discuss the HoTs and specific accommodation works in relation to the land holding, including mitigation of impact where possible. The Injurious Affection and severance point regarding the properties within the AP's title extent was discussed at the meeting on 19 May 2026 and this is being taken away for the Applicant to review practical solutions. A further meeting will be held following the issue of version 3 of the HoTs.
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	The current proposal runs across a hill around 10 feet below the highest point in Essex, located on our farm. That alone demonstrates poor route scrutiny and a failure to meaningfully apply the Holford Rules. And why is the Metropolitan Green Belt being so heavily desecrated when alternative routes—for example offshore, or East of Chelmsford—could reduce harm to the Green Belt? Where onshore infrastructure is pursued, undergrounding should be properly and transparently considered particularly in sensitive areas.	The Applicant set out its position on strategic alternatives in response in Item 5.1 of Table 2.2 in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**. In terms of offshore considerations, the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore alternating current (AC) solution, in line with the National Policy Statement (NPS) EN-1 (2024) and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury project, in line with the transmission and licence obligations. It also assumes that the connection should be largely overhead, as aligned with NPS EN-5 (2024). In terms of undergrounding, paragraph 2.9.21 of NPS EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.

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			The Applicants position is that Transmission infrastructure is not inconsistent with the purposes of the Green Belt. On the matter of routeing and the Holford Rules the Applicant notes that a wide range of factors must be considered in developing the route for a project. The Rules themselves are caveated to recognise that a balance between factors is typically required and that it is not possible to find a route that meets all aspects. At this location routeing is constrained by the general extent of urban areas to the east and by ancient woodland to the West (further detail in **5.15 Design Development Report [APP-122]** from paragraph 9.3.4).
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	Current Order limits prevent access into the western half of our farm, which also includes residential & commercial properties as well as agricultural fields. This is due to the lack of access provisions and Ivy Barn Lane being included within the Order limits and seemingly capable of being closed off. This is a fundamental design and justification failure for a scheme seeking compulsory powers. The order limits on paper may well have been reduced from original iterations, but in practice the order limits are taking much larger areas due to poorly designed boundaries and access proposals, severing additional land in attempt to say it is the cheapest option. We are now engaging with Fisher German regarding survey licences to try and reach sensible solutions around parking and access, which has been welcomed. But this is far too late. These matters should have been resolved through the design process, particularly when it seems there is no wiggle room with these HoTs.	Following the meeting, the Affected Party (AP) will revert with proposals for suitable crossing points across the Order Limits during construction, following liaison with his contract farmer – these will then be reviewed by the Applicant. Crossing points will be available where needed to maintain practical access across severed land but cannot be confirmed because final placement depends on detailed design and construction need. An Agricultural Liaison Officer will be on-site to assist with matters during construction and to liaise between the AP, their contractor and the Applicant's contractors. Conversations are ongoing with the AP on access and access routes for surveys, working with the AP on suitable timings. The AP has engaged in a voluntary compound for the ground investigation survey programme. Ivy Barn Lane is proposed to be closed to enable the construction of the site access points, and for netting installation to facilitate overhead line stringing. The closures are of short duration, and can potentially be undertaken overnight. Access will be maintained, and the coordination and planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently.
Angus Upton on behalf of SJ Upton Trustees No 1 and 2 Ltd and Simon James Upton	**[REP4-346]**	Hylands golf course has not been operating for many years. This should be seriously considered when assessing route alternatives.	As noted on page 22 of **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**, whilst the Applicant notes the comment that Hylands Golf Complex is no longer fully operational as a golf course, the alternative would still remain less preferred given the likely impact on the residential properties and multiple listed buildings and scheduled monuments.
Innova Renewables Limited (IR)	**[REP4-362]**	IR (through its subsidiary Hall Farm Solar BESS Limited) is a statutory undertaker by virtue of the generation licence issued by Ofgem on 2 April 2026. In respect of that site, IR considers the proposal will cause serious detriment to its undertaking (as per s.127 of the PA) because it will limit (potentially severely or entirely) its ability to operate should the BESS infrastructure be impacted. This point has not been addressed by the Applicant in its response to D2 submissions [REP3-070], nor did it reply to the point at CAH2 preferring instead to reply in writing at Deadline 4.	The Applicant considers that Hall Farm Solar BESS Limited is not a Statutory Undertaker to which s127 of the Planning Act 2008 applies. whilst they have a generation licence, they do not meet other qualifying criteria within section 127 of the PA 2008. The Applicant is seeking to clarify this position with Hall Farm Solar Bess Limited. In any event the Applicant's position is that the Project can be delivered without serious detriment to Hall Farm Solar BESS Limited's undertaking. The Applicant remains in negotiation with Hall Farm Solar BESS Limited to seek to agree a solution to address their concerns.
Innova Renewables Limited (IR)	**[REP4-362]**	Hall Farm Eastern Swathe of land Despite NG knowing about IR's consented scheme before it submitted the DCO application (and the overlaps), this land remains in the Order Limits. This is of significant concern to IR. This area of land includes the main BESS facility and CA powers are sought over almost its entirety. NG's position is	The premise for both the eastern and western corridor approach defined within the **3.1 Draft Development Consent Order [Revision E]** was to define a corridor wherein both projects could mutually co-exist based on the design information provided to National Grid by the respondent during the historic and significant engagement undertaken. As the Innova Renewables Limited design changed to now occupy both the eastern and western corridor without regard or prior consultation to

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		that this land was included in the scheme as a 'just in case'. That 'just in case' position being founded on IR's battery project not being granted planning permission. This is the position advocated in NG's Design Development Report [**APP-122**]. At Deadline 3, NG provided a self-contradictory response to question GEN1.13 of the ExA's FWQs. In Response to FWQs [**REP3-074**] NG notes that "the option to utilise the eastern corridor, within the current DCO order limits, may be one the Applicant seeks to investigate further if of benefit to either party pending the outcome of the ongoing attempts to reagree a design solution." This is a material shift in justification on NG's part which it has not explained (and failed to at CAH2) and is not something that IR can ever support. There was no agreement previously to the layout of IR's scheme, as there was no requirement for there to be one. There is no conceivable benefit to IR that could result from overhead lines spanning its approved BESS project. Nor is there a realistic argument to suggest that a failure to find a solution to the project interfaces in the western portion of the site warrants the occupation of the entirety of the main BESS infrastructure. In any event, it is disputed that NG can now seek to shift its position in this way and at this late stage. Given the planning permission for Hall Farm was granted before the N-T application was submitted, the use of the Eastern Swathe is clearly not needed and should be removed from the DCO. It also should not be used as some sort of leverage or bargaining position by NG as justification to permit interactions on the western portion of the Hall Farm site given its inclusion in the DCO is entirely unjustified. IR respectfully asks that NG commits to no longer seeking these rights, in line with what they have communicated directly to IR in previous discussions and in line with their own written explanation detailing why the Eastern Swathe was included in the DCO in the first place i.e. those rights were only sought in the event that Hall Farm did not receive planning permission. To highlight how extensive the CA powers sought over Hall Farm are.	the Norwich to Tilbury project, so too has the rationale for the requirement to keep both corridor options open until a mutually agreeable design solution can once again be implemented. National Grid strenuously contests the point on no previous agreement being agreed or required noting that National Grid was an Interested Party in the Hall Farm planning application to which it returned 'No Comment' as found in the Delegated Report for the scheme based on the design information on which National Grid were consulted. Innova Renewables Limited later amended the design to a known conflicting design without consultation to National Grid while maintaining the now outdated 'No Comment' from National Grid within its planning application to the Local Authority. National Grid continues to engage with Innova Renewables Limited in seeking a solution and notes the respondent's engagement in also seeking to cooperatively come to a revised design solution which would allow both projects to proceed without issue.
Innova Renewables Limited (IR)	**[REP4-362]**	Hall Farm Western Portion of the site As it stands, NG is proposing to locate pylon RG4 and the temporary haul road in a consented flood attenuation pond. NG's scheme will also have cross-overs with IR's consented main access and underground cabling which runs north towards the substation. There is a simple workaround to resolve a number of the on-the-ground conflicts. NG has proposed to move RG4 up to 35m to the south, removing the physical interface between this tower and the	National Grid has proposed a preferred design solution to Innova Renewables Limited offering to relocate proposed asset locations to accommodate a revised Innova Renewables Limited flood attenuation pond of which a successful outcome will resolve the site interaction. National Grid notes the historic engagement with Innova Renewables Limited and the late-stage notification shortly before Development Consent Order submission providing details of the inclusion of a flood attenuation pond sited atop the Project's proposed asset locations as known by the respondent from the extensive engagement between both parties. National Grid continues to support and engage on progressing the proposed solution for both parties to take reasonable steps to address.

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		approved attenuation pond. This is welcomed by IR but it needs to be secured by an agreement between IR and NG. Whilst NG has been amenable to moving RG4, it is reluctant to move the haul road. NG prefers to insist that IR amends its planning permission to accommodate a change in this area but IR is reluctant to seek this; firstly on the basis that IR's consent pre-dates the N-T application as noted above, but secondly because the interaction can be easily accommodated by NG. NG has confirmed that the 20m width area for the haul road can in practice be reduced to 5m. The overlap with the basin is expected to be under 10m. As such, IR maintains that by making a simple, and very minor amendment to the Order Limits, into an area of unconstrained land to the immediate west, it would enable the haul road to be moved, and remove this conflict entirely (in summary it would entail moving ~30m length of haul road ~10m to the west). IR is mindful that other, and more substantial, change requests have been made by NG during the course of the DCO Examination. These have all, to date, been accepted by the EXA. NG's has explained to IR that such a change request cannot be made in this scenario because it would be 'unduly onerous' from a programme perspective. IR considers this position to be wholly inadequate given the impacts of this interface with it project i.e. consented infrastructure which has been designed specifically to mitigate impacts from the BESS project. Moreover, it is no justification to seek CA powers on the basis that it is too difficult to change the scheme. As alluded to above, and as NG noted at CAH2, whilst it may be possible to amend the Hall Farm planning permission to accommodate a change to avoid a conflict, IR does not consider that this is the appropriate response for reasons noted. That said, IR has offered to discuss this further with NG if it can offer a simple solution. Such an amendment would of course be subject to technical assessment, acceptability to IR and ultimately agreement with the Local Planning Authority. IR notes this for completeness and without prejudice to its preferred position on this point.	
Innova Renewables Limited (IR)	**[REP4-362]**	IR emailed NG on 21 April and offered to discuss solutions further (including the solutions noted above). However, to date, no response has been received and there are no further meetings scheduled. IR encourages NG to engage with it on these matters.	National Grid has engaged with Innova Renewables Limited on these matters and attempts to reach a solution are being further progressed by both parties.
Innova Renewables Limited (IR)	**[REP4-362]**	Parkgate There are project overlaps e.g. a pylon is located in the middle of the consented solar panels, a haul road, laydown area and temporary scaffolding along Church Road will impact panels and landscaping.	Negotiations have continued to progress positively. Following the meeting held between IR and National Grid on 26 May 2026 regarding Parkgate, the parties discussed the residual interfaces between National Grid's proposed works and IR's project. Discussions included the potential requirement for the temporary removal of a limited number of solar panels to facilitate the conductor installation works.

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		Given the consent was issued in December 2023, it is unclear to IR why NG has taken the approach it has and sought to impact the consented solar farm in such a way. IR does not consider that NG requires CP powers over the site as there are alternative designs and approaches which could limit the interactions. As such, IR objects to the current extent of CP powers sought over the site. That said, negotiations have been positive and are progressing. The parties are in regular contact and have recently agreed updates to the draft SoCG which is being submitted to the ExA by NG at Deadline 6. NG has offered a design solution, which will need to be formally agreed and secured but progress is being made.	National Grid is to arrange a further meeting involving National Grid's civil and overhead line design partners to discuss the remaining interfaces with IR's project in more detail, including the potential temporary removal and reinstatement of solar panels. The parties remain in regular contact and progress continues to be made towards agreeing an appropriate design solution and updating the associated terms for the legal settlement agreement.
Ward Hadaway LLP on behalf of Northumbrian Water Limited	**[REP4-381]**	The Applicant has indicated that the temporary powers were sought to enable a temporary water supply connection to a construction compound but NWL has made clear that the pumping station already serves significant existing supply demands; and without detailed and agreed technical analysis, NWL cannot support any proposal that relies upon a connection from this asset. Importantly, in this context, temporary use powers are not low risk and can present operational and safety concerns equivalent to permanent interference. Given the risk of serious detriment, the relief sought by NWL is limited and targeted. NWL requests the: reclassification of parcels F 3/91, F 3/93 and F 3/96 as Class 8 land in the Book of Reference and land plans; with the effect that they are not subject to compulsory acquisition or powers of temporary use.	The Applicant is proposing to Class 8 plot F3/96 to ensure that Temporary Possession powers do not cover the Little Waltham Pumping Station. In relation to plots F3/93 F3/72, whilst the Applicant wishes to retain temporary possession powers over these plots for the purposes of providing a temporary power supply to its construction compound, the Applicant can ensure that access is retained for Northumbrian Water Limited's benefit to the Little Waltham Pumping Station at all times. As well as putting plot F3/96 in Class 8, the Applicant has previously agreed with Northumbrian Water Limited with a draft agreement covering Little Waltham Pumping station on a standalone basis. The Applicant will re-iterate its offer to enter into this agreement with Northumbrian Water Limited to address Northumbrian Water Limited's concerns about Little Waltham Pumping Station.
Ward Hadaway LLP on behalf of Northumbrian Water Limited	**[REP4-381]**	The protections currently under discussion would, if formally agreed, offer appropriate safeguards for Little Waltham and prevent operational interference. However, it is important to note that an impasse has been reached between NWL and the Applicant on another scheme which is intended to form the basis on which the protections are to be documented as part of this scheme. That impasse relates to the Applicant's proposed requirement for NWL to contribute to the costs of providing alternative apparatus necessary for NWL to exercise its statutory functions. NWL is concerned that the cost contribution mechanism proposed by the Applicant, in substance, has a similar effect to the cost sharing regime provided for under sections 85–91 of the New Roads and Street Works Act 1991 and in NWL's view, this would effectively introduce cost sharing through the DCO process, notwithstanding that the Applicant has not sought to invoke those statutory provisions expressly through the Order.	The Applicant and Northumbrian Water Limited have been in negotiation over the Protective Provisions for some time but an issue in relation to deducting the costs of Betterment in the context of the costs of diversion of Apparatus (if any diversions of Apparatus is necessary), has arisen in the context of the Sea Link project. The Applicant needs to consider this new point but it still expects to include bespoke protective provisions for Northumbrian Water Limited in the draft Development Consent Order at Deadline 6, in an agreed form if possible.
Lower Thames Crossing Project	**[REP4-364]**	The Lower Thames Crossing (LTC) Project is concerned about the significant temporal interactions between the projects in terms of the respective construction programmes	The Applicant acknowledges the spatial and temporal interactions between the projects and continues to engage with Lower Thames Crossing (LTC) through a series of fortnightly meetings on this topic.

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		and methodologies, which would mean that the same plots of land might be needed by both LTC and NGET at the same time for different or the same purposes. There are also particular concerns about how the proposed compulsory acquisition powers would impact upon the LTC team's ability to deliver on the environmental and community commitments and obligations in the LTC DCO.	The Applicant has shared programme information with LTC, including the outline programme presented in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**. The Applicant acknowledges LTC's request for a more detailed construction programme and confirms its intention to share this information when it becomes available. The Applicant has explained that this level of programme detail can only be confirmed once the design has progressed to a more detailed stage, which is typical for Development Consent Order projects. A workshop between the parties is scheduled for 15 June 2026 to discuss the updated **2.2 Land Plans- Section H [Revision D]** submitted at Deadline 5, including compulsory acquisition powers. The Applicant is committed to working with LTC and anticipates that appropriate terms can be agreed to regulate the project interfaces.
		At CAH1, the LTC Project stated that it would need to carry out a further analysis of the interaction between the land plots in order to fully understand the interactions and identify suitable solutions. In order to do this, the LTC Project has been waiting for further information from the Applicant which was provided on 27 April 2026. The LTC Project has now reviewed these layers and whilst the layers provide a visual representation of the NTT project, the layers are not fully aligned or embedded with the NTT proposal. In particular, the Order limits do not seem to align with the land use types and the data still appears to include both Scenario A and B data. The layers also do not contain plot boundaries and the level of detail is lacking. It is envisaged that the interface between the two projects will be managed through a side agreement. However, more detail is needed before this can be agreed.	As detailed in matter 3.2.3 of **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP4-195]**, the Applicant provided Lower Thames Crossing (LTC) with the full set of GIS layers that informed the updated plans submitted at Deadline 4 on 27 April 2026. The updated plans comprised: **2.3 Works Plans - Section H [REP4-016]**, **8.15.1 Proposed Project Design - Scenario 18 [REP4-314]**, **8.15.2 Proposed Project Design - Permanent Features - Scenario 18 [REP4-315]** and **8.15.3 Class of Rights Plans - Section H - Scenario 18 [REP4-316]**. The Applicant can confirm that the data shared with LTC reflects Scenario B only. At Deadline 5, the Applicant submitted the updated **2.2 Land Plans- Section H [Revision D]**, which reflect the updated plot boundaries. A workshop between the parties is scheduled for 15 June 2026 to discuss these updated land plans. The Applicant remains committed to working collaboratively with LTC and anticipates that appropriate terms can be agreed to regulate the project interfaces.
National Highways	**[REP4-342]**	Compulsorily acquisition is not necessary. A detailed review of the plots has been undertaken by National Highways and provided to National Grid. It is apparent from that review that the proposed permanent land take plots fall into the following categories: • Land which is currently National Highway's managed highway and required for highway works to the SRN or widening works as part of the Applicant's proposals – such works are authorised by the DCO subject to protective provisions which ensures that National Highways approve the detail of those highway works and National Highway's road space booking requirements are followed. • Land which is not highway but is owned by National Highways and is required for Strategic Road Network (SRN) widening as part of the Applicant's proposals. This land does not need to be acquired only to be transferred back to National Highways. Again, access to this land can be granted by National Highways through the protective provisions and by agreement.	The Applicant agrees that subject to reaching agreement with National Highways on terms of Protective Provisions and a Side Agreement that it should not be necessary to acquire Class 1 land rights in relation to land within the extent of adopted highway within the SRN. Such land has been included in the Order to ensure that any extended highways works can be dedicated and adopted to National Highways under the Protective Provisions in the Order and to ensure it is possible to address/rectify any title issues in respect of land that falls outside the adopted highway boundary as such boundaries are not always clear. The Applicant agrees (that irrespective of the land ownership position) that they will need to seek approval of National Highways to carry out works on the highways and in accordance with the road space booking requirements in the Protective Provisions. Provided that National Highways confirm within the Side Agreement the extent of the adopted highways boundary and that they do not require dedication or transfer of land in respect of any of these plots in the SRN, then the Applicant will not need to exercise any CA powers. This is subject to agreeing a Side Agreement which the Applicants understand that the parties are seeking to resolve. In relation to this second scenario if National Highways confirm that they do not require any dedication or transfer of land (including subsoil ownership) in any such land plots, as part of the compliance with the Protective Provisions in relation to highways works and extension of the highway in the SRN, then the Applicant would not seek to use CA Powers in relation to these plots, provided that there is a concluded Side Agreement with National Highways.

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		There is no need for the plots in these two categories to be compulsorily acquired. They are either part of the SRN or land which National Highways own that will become part of new SRN. The inclusion of these plots in the Book of Reference is not necessary or proportionate. National Highways will set out the particular plot numbers in its further written representations so that the ExA have these.	
National Highways	**[REP4-342]**	In terms of the Acquisition of rights, National Highways understand that there is a single plot relating to undergrounding of cabling, the other rights are for overhead lines. Again the majority of the plots relate to operational highway which forms part of the SRN. Rights are not required, as the Applicant has statutory powers under section 50 of the New Roads and Street Works Act to install, maintain and repair apparatus in a public highway. National Grid can undertake the overhead line works without compulsory acquisition and so again the inclusion of these plots is not necessary or proportionate as required by the CA guidance.	The Applicant notes that there is at least one at depth crossing of the SRN (possibly two). The Applicant will require an easement to lay cables in the subsoil by agreement and until such Easement is in place will require CA powers to ensure that Project is deliverable. In relation to the Overhead Lines, the Applicants require permanent easements for the retention of this Apparatus and do not agree that NRSWA 1991 is an appropriate mechanism for crossings of this nature at height. The Applicant is seeking to agree voluntary land rights for these easements with National Highways but until such Easements are in place will require CA powers to ensure that the Project is deliverable. The Applicant wishes to mirror the approach taken between the parties in relation to the Yorkshire Green Development Consent Order and the Applicant and National Highways are in continued discussions over this point.
National Highways	**[REP4-342]**	Depending on the depth of the single underground cable that may require an easement but again National Highways are prepared to grant that easement by consent and is willing to negotiate terms.	As above, it is understood that depending on depths there may be two crossings of the SRN below the highway in the subsoil. Where National Highways is the subsoil owner the Applicant is seeking to negotiate with National Highways for the grant of an Easement. However, until such time as voluntary land rights have been fully negotiated and granted, the Applicant requires CA powers to ensure that the Project is deliverable.
National Highways	**[REP4-342]**	Within the land over which rights are to be secured, there are plots where National Highways' ownership is historic. The relevant roads have been detrunked which means that ownership has in fact passed to the local authority but the transfer of that ownership has not been registered at the Land Registry. The Applicant is to update the Book of Reference accordingly. As this land is non-operational land National Highways can agree to transfer any interest it does retain by agreement. Compulsory acquisition is not necessary. When it comes to temporary possession National Highways would expect to permit access subject to it usual arrangements for permitting works on the highway having followed the procedures in its template protective provisions.	The Applicant is seeking to agree the approach with National Highways in relation to the way these de-trunked plots are recorded in the Book of Reference. Once agreed the Applicant will reflect this in the Book of Reference, such that these plots are not shown as owned by National Highways. In relation to those de-trunked plots which are required for highway widening works in local highway authority roads, it is understood that National Highways does not object to use CA powers, if required to dedicate and transfer land to a local highway authority, not least because National Highways are not the owner of these plots. Any Class 1 acquisition of land in such plots of land within or adjoining local highway authority roads would only be used where required to enable such highway widening works to be dedicated as adopted highway and the freehold transfer to be made to the local highway authority, if required by the local highway authority in line with the protective provisions with that local highway authority. It is assumed in relation to de-trunked plots that as a result of the de-trunking of these plots, TP powers used over these areas are not a concern to National Highways and access to any local highway authority roads would be taken in accordance with the protective provisions for the benefit of local highways authorities in the Order. In summary the Applicants do require TP and CA powers over the de-trunked plots which National Highways are disclaiming ownership of to ensure land rights to carry out highways widening works and the dedication and transfer of the land to the local highway authority, if required by that local highway authority but this would always be in accordance with controls on access to local highway authority roads in line with the protective provisions.

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National Highways	**[REP4-342]**	National Highways would like to see the Book of Reference updated to remove land which is operational highway. The protective provisions included in the dDCO at part 5 of Schedule for the benefit of National Highways at least need to be revised so that paragraph 7 headed "prior approvals and security" requires National Highway's consent before any powers of compulsory acquisition or temporary possession under Articles 24, 25, 26, 27 and 28 are exercised. National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.	In relation to the compulsory acquisition of land (Class 1) the Applicant and National Highways are seeking to agree appropriate controls on the Class 1 acquisition of land from NH's Strategic Road Network in the Side Agreement. Until a Side Agreement is in place which addresses the fact that National Highways will not require the Applicant to dedicate and transfer of land in respect of the Class 1 plots in the SRN in respect of highways widening works, the Applicant is still seeking these powers. In relation to the compulsory acquisition of rights (Class 2 to 6) the Applicant and National Highways are seeking to agree the grant of voluntary land rights for the crossing (below or above) the SRN with the Applicants Apparatus. Until such time as voluntary land rights have been granted the Applicant still requires CA power in the Order as sought and continues to negotiate with National Highways to agree a Side Agreement and Protective Provisions which address both parties concerns. If negotiations are not concluded the Applicant will make section 127 submissions explaining why there will not be serious detriment to the undertaking of National Highways.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	One fundamental problem that we have in Great Waltham, is no one seem to know where the pylons are being positioned. In the dDCO 5, 1, B, ii states '*to any extent upwards not exceeding 6m save in respect of pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) which may deviate vertically to any extent upwards not exceeding 18 metres'* This was confirmed in 8.9.1 Applicant's Responses to First Written Questions (REP3-074) (page 178) 'the 18m vertical LoD is required to enable the change from low height to standard pylons. It should also be noted that this change also enables the removal of one pylon between TB140 and TB143'. This shows that it was the Applicant's intention to always revert back to the tall pylons and document (APP-066, p.5236) indicates that the project will proceed using tall pylons (Scenario B). They confirmed in Deadline 1 cover letter (REP1-141) (page 25) that are going to proceed with tall pylons and provided two tiny maps that give no detail. Why can the Applicant not produce documents that we can look at for the pylons affecting our land. On the 7 May I was still receiving documents from the Applicant showing the route with low hight pylons. How can we make comments to the planning inspector if we aren't being given all the details. In this meeting, the Applicant confirmed that the pylons TB137 – TB139 were to remain low height pylons to protect Langleys park and garden. If the Applicant won't go the alternative route, please can they make all the pylons tall pylon as having a couple of low height pylons will stand out and make it worse.	An initial meeting was held on 24 February 2026 to discuss Heads of Terms (HoTs) and accommodation works. This feedback was provided to the Applicant to review on the design issues raised. Pylon heights formed part of the discussion along with the siting of TB143 away from Balls Farms. A meeting was held with the son of Mr Micklem (Charlie Micklem) on the day of the hearing to review the concerns raised during the hearings, such as pylon heights and change of the farm ownership structure. During the meeting, Charlie Micklem confirmed that Langleys and the wider Estate was in the process of being transferred into his name. The Applicant noted these comments and is updating the HoTs accordingly. Another meeting post CA Hearings was held on 7 May 2026 which reviewed the plans in detail and considered landowner requests for micro-siting, access and cable stringing amendments Another meeting was held on 01 June 2026 for design feedback with the AP and their agent on-site to continue these discussions. An email was sent to the landowner on 03 June 2026 with the Applicant's position on a number of the queries raised on 01 June 2026, including the revised pylon locations and heights. There are a number of actions being taken away for the Applicant to revert on in due course. The Applicant has issued an updated Revision B of the Works Plan covering this section of overhead line (**2.3 Works Plans - Section F [Revision B]**) – see sheets 3 and 4 which now reflect the change to the Scenario B design, whereby RG142 has been removed and RG140 and RG141 changed to standard lattice pylons.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	Alternatives With regards to the great Waltham alternative, in document Design Development Report for the Project (APP-359), National Grid stated that the alternative route would also need to cross part of the land used by The Wilderness	The Applicant notes the information regarding Mann Wood which would be passed by the Project regardless of the route taken to the west of Chelmsford. The Applicant is also clear that there were and remain multiple reasons for its preference not to take forward the more western route that would interact with this outdoor education facility including the increased length of the route, passing in close proximity to other

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		Foundation for outdoor education including in part for short residential educational camps. Some disruption during construction likely to be unavoidable. However using this charity as a shield for the alternative route, National Grid has not mentioned that TB122 – TB123 runs alongside Manns wood which is operated by the Wilderness Foundations to further enhance the area being offered for education. Therefore this reason can not be used as the wilderness foundation will still be severely impacted with the current route. National Gird also claim in Design Development Report for the Project (APP-359) that 'In addition, the trees in the extensive parkland would provide filtering of views at Great Waltham and to direct views from the Grade I Listed Langleys' However as mentioned the majority of tress that National Grid are relying on are Salix Alba Caerulea (Cricket Bat Willows). We grow cricket bat willows as a commercial crop on the Langleys Estate, and once the tree reaches the optimum size, around 12-15 years, they are felled. This means that the screening national grid is using is ever changing. Cricket bat willows are treated the same as wheat and other crops grown on the farm and are not grown for filtering views.	properties and its position remains that the western alternative is less preferred. This is set out in **5.15 Design Development Report [APP-122]** from paragraph 9.2.4. The Applicant understands that the Affected Party is providing further information on the Willows at Deadline 5 and will respond after sight of that material.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	Mitigation National Gird were very proud in ISH2 to state that for every tree cut down they will be planting three more. When questioned they confirmed that there trees would be whips (typically a whip is anything below 1m tall but typically 40cm). National Grid stated that this was due to them being young and vigorous, however this means they take a long time to grow. Typically an oak tree grows 1 ft per year meaning to grow to 2m will typically take six years. Once these oak finally reach an age of being able to help screen the pylons, the pylons themselves will be coming to the end of their life. Trees can be planted at 2-3 meters tall, but take more caring. I have attached pictures showing trees that are 3 meters tall, planted last summer (2025) to help screen the house from the pylons. As you can see they are growing and looking healthy. National Grid won't want to plant taller trees due to the maintenance and cost, but this is a small sacrifice for all trees they will be destroying for 'green energy'. I also believe it's for the landowner to chose where to plant the trees not National Grid. Will National Grid be able to confirm this?	The Applicant confirms that whips and transplants (typically 2–3 year old plant stock) will be used for replacement planting. Larger and older trees (standards/heavy standards), for which there is typically a greater risk of transplant shock, and more need for active aftercare such as watering to reduce the risk of failure, will not be used outside of environmental areas. Regarding landowner input into the replanting process, the Applicant has committed to returning the landscape back to baseline conditions as far as practicable i.e., replacement of removed hedgerows along site access routes. However, the Applicant would be happy to discuss additional planting with Landowners particularly with respect to tree planting.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	Biodiversity Net Gain In the Applicant's report Biodiversity Net Gain Report (APP-299), it said the area under pylons 'These areas would not be re-instated as agricultural land, so it has been assumed that a habitat of low distinctiveness could be 'created' (sparsely vegetated land - tall forbs) in 'good' condition. is using area under pylons ' Areas under pylons become a weed infested	The term 'created' in the **Biodiversity Net Gain Report [APP-299]** is used in the context of the Biodiversity Net Gain metric tool whereby habitats are retained, enhanced or created. These three terms are the only terms that are used for habitats in the metric. The ground beneath each pylon will be disturbed / dug over when the pylon is constructed, so the habitat cannot be classified as 'retained' or 'enhanced'. The only option for classifying the habitat that will develop under the pylon is to identify it as 'created'. As identified in this representation the land typically becomes vegetated and where the pylon is in an arable landscape it is often subject to

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		area that farmers have to deal with, they will not create habitats as often we have to spray the area to stop grass weeds entering our fields. This shows the lack of understanding that the Applicant has for farmers and how they are trying to claim the enhancement of biodiversity by destroying the countryside.	herbicide applications. For the purposes of the Biodiversity Net Gain assessment this area of land has been classified as the UK Hab habitat 'sparsely vegetated land-tall forbs'; this habitat is the closest fit to the habitat that would be 'created'. To be in 'good' condition the habitat would need to pass three criteria. These criteria are i) have a heterogenous structure, ii) support plants of benefit to wildlife, i.e., the 'weeds' that are mentioned, and iii) not support invasive non-native weeds. In the Applicant's experience it is highly likely that the land beneath the pylons would pass these three criteria. The Applicant has not misrepresented these facts as 'creation' or 'enhancement', it is simply the case that the Applicant has used the standard terms that are used in the metric.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	Following CAH2, the Applicant provided a copy of the HoTs for land relating to the Langleys estate. A meeting followed on 30 April 2026 and I am currently waiting for an updated copy with the correct details regarding ownership.	Fisher German has now been advised on the extent of the changes to ownership structure of certain affected parcels. Updated Heads of Terms will be issued in version 3, with revised plans sent in advance to confirm the revised ownership structure.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	With regards to the HoT, section 17 Planning states 'The Grantor will not make any objection in respect of any planning application or DCO application which is submitted by the Grantee so far as each relates to the Grantor's Land.' Not only does this stop me objecting to the current DCO, but the wording can be used to stop me objecting to any DCO submitted by Grantee (National Grid Electricity Transmission PLC (company number 02366977). Having raised this point when we received version 1 of the HoTs in September 2025 and having received version 2 of the HoT it is still yet to be changed. National Grid said in a meeting on the 7 May, the likelihood of them searching old documents is very slim, however to landowners this doesn't rule it out. If we fail to agree on HoTs we are being threaten with compulsory powers which limits us greatly and almost forces us to sign the agreement. We shouldn't be forced to sign a document that ties our hands behind our back for any future projects that National Grid may take on our land.	The Applicant confirms that any provisions relating to non-objection are intended to provide certainty that agreed rights can be implemented without subsequent challenge where voluntary agreement has been reached. However: • Such provisions are not intended to prevent landowners from engaging in the statutory planning process more broadly • The scope and application of any non-objection clause will continue to be reviewed through engagement to ensure that it is reasonable and proportionate within the context of voluntary agreements. The Applicant can also confirm that this clause only relates to the Norwich to Tilbury project.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	I have provided the Applicant with information from Anglian water stating that '*even if a borehole is drilled and then backfilled it is a still a potential link to the aquifer and therefore we have to treat it as a borehole, therefore the exclusion zone would have to be put in place and biosolids cannot be spread within that exclusion zone'*. This would affect my land for generation to come and make farming even more difficult and expensive. From analysis-done by my farm consultant, sewage sludge in 2023 was £130 per ha cheaper than artificial fertiliser. This also doesn't take into account the spreading cost for artificial fertiliser but does for the spreading of sewage sludge meaning it would cost even more.	The Applicant is aware of the issue raised regarding spreading matter around bore holes. The Applicant is in contact with Anglian Water directly to better explain the works proposed and the Applicant's reading of the relevant legislation. It is in the Applicant's interest to understand this matter further before any works are undertaken. The Applicant has advised Mr Micklem in an email on 03 June 2026 that it will liaise directly with him once a response has been received from Anglia Water.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	I highlighted the route through Great Waltham and National Gird confirmed at CAH2 (30th April) and again in a meeting with Fisher German and the Applicant on the 7 May 2026	A meeting was held on 01 June 2026 with detail shared on screen and subsequently provided to the Affected Parties via email on 03 June 2026, confirming the proposals for pylon locations.

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		they would get me to meet with the routing team to discuss why it has to come through the Waltham gap and where the pylons are going to be located, as of 12 May this meeting is still yet to be confirmed.	The initial routeing through the Waltham Gap was derived from the need to consider a corridor to the west of Chelmsford. The initial consideration identified that the route provided the shortest feasible alternative. This does not mean that the corridor is free of effects but was considered to be able to accommodate a connection.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	I requested OS maps on the 25 February to show all constructive elements that are on our land, having chased this us at the hearing I was still yet to receive the maps. After CAH2, I was presented with satellite maps showing it but not in much detail and finally on the 7 May I was presented with OS maps still showing the low height pylons even though we will get the taller pylons.	Larger plans were provided on the 7 May 2026 showing more details taken from the construction drawings. The plans provided contain the most comprehensive detail available at that time. Further discussions were held on 1 June 2026 at a site meeting with the Affected Party and their representative. On 03 June 2026, a revised map confirming the current design was sent to the landowner via email. The Applicant is due to provide revised HoTs plans, updated to align with the new ownership structure in due course.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	With regard to the archaeological surveys that took place in August 2025, we had a meeting with Fisher German to discuss site access, timings, compound placement etc and that I was to be notified before work commended and anything brought onto site. Firstly, I was not informed when they arrived on site so from a health and safety position this was dangerous. We were told that there would be people on site from 8-5 with no mention of anyone staying overnight. However, I later found out that there was a security guard with a dog on site. Once again from health and safety this should have been made aware. The main problem was with the licence that was drawn up was dated a year earlier (2024 not 2025) and secondly it was not followed. The compound area in the agreement was completely ignored and put somewhere else without even asking for permission. I only found out once I turned up. What is the point in having a legal document if it is not to be followed?	Fisher German is addressing concerns directly with the Affected Party regarding the surveys. Agricultural Liaison Officers running the survey programme are feeding concerns, access agreements and routes, and survey timings back to the survey contractors. New licences have been drawn up which have been revised since the initial 2024/5 survey licence. Any further survey works will have an Agricultural Liaison Officer present to engage with all survey related activity on the holding and to be the point of contact for any concerns raised. This ensures a consistent communication process and to prevent any further site miscommunications. The Applicant recognises the need for adherence to legal documentation and will continue to work closely with the AP regarding ongoing land rights required relevant to both the permanent and temporary rights being sought for construction and subsequent operation of the project. In regard to the ongoing survey access rights required for intrusive and non-intrusive works, the Applicant is in ongoing dialogue with the APs agent in order to seek a negotiated position for right of access moving forward.
Langleys Estate Charles Nicholas Micklem	**[REP4-387]**	I received a letter from the Applicant dated 10 July 2025, stating that a consultation is out on a parcel of land relating to unregistered land, no map was provided and when questioned was not provided with any information, as stated at CAH2, this involved whatapp message and a phone call on 14 July and chased on the 12 August. But the deadline closed on the 22 August and still to this day I am not sure what land they are referring to. How can I consult on land that they won't tell me where it is. With regards to all the issues above, how can national grid be trusted to follow the rules? Even with legal documents.	The Applicant sent out unregistered land questionnaires to identify parcels of unregistered land on the route; these are sent to multiple surrounding landowners in an attempt to identify the potential interests. Landownership discussions are ongoing following the update to the ownership structure and will be discussed with the Affected Party in the upcoming meeting on the 1 June 2026.
Bianca Moller	**[REP4-384]**	I feel the feedback we have provided during the consultation stages has not been listened to regarding our proposed alternative route. The feedback National Grid referenced in their response during the CAH2 document reference 10-22.46. I have since reviewed the document reference and consider some of the feedback to be inaccurate. 1) It has been stated by National Grid that you would need to cross Hapton country wildlife site	The Applicant acknowledges the Affected Party's feedback but notes that to achieve the crossing point of Fundenhall Road enabling the alternative alignment lower in the valley requires moving the overhead line to the eastern side of the Grade II listed property that is located just to the east of the Order Limits on Fundenhall Road. The Affected Party is correct that Hapton County Wildlife (CWS) site does not completely fill the gap between the Grade II listed property and the next property further along Fundenhall Road to the east. However, there is only a gap of approximately 75 m between the edge of the Grade II listed property curtilage and the CWS, which if the

Party	PINS ref	Third party comment	Applicant's Response
		(CWS) should the alternative alignment be taken. I would like to note that the CWS is situated to the east of the farmers proposed alternative route, therefore you would not need to cross it. I think National Grid should revisit their maps and familiarise themselves with where the boundary lies for the CWS and surrounding meadow land. 2) It would not be bringing the alignment closer to more properties, it would be moving it away and reducing the visibility of the pylons from a greater number of properties especially those situated on and near the stretch of Norwich Road from Fundenhall through into Tacolneston.	overhead line was routed in this gap would lead to a transfer of effects onto other receptors, either the alignment closer to a listed property, or oversail of mature vegetation and the CWS. Additionally, to achieve this alignment the angle of deviation must be made from circa pylon RG26 or RG27, which subject to final positioning would also likely transfer effects to another property further to the east. For these reasons the Applicant maintains the opinion that the right planning balance has been achieved.
Bloor Homes Limited	**[REP4-350]**	<u>Land Parcel 6/71a</u> This is a strip of land adjacent to Brentwood Road. NGET is proposing a compulsory acquisition of this land to provide its temporary and permanent access. This strip is excessively wide. Bloor has sought comfort that NGET will not require the full extent of this land and was hoping for the land plans to be scaled back. Bloor have also sough comfort that it will be able to construct the permanent access and lay services as required and commence building within Area A as shown on the plan appended to the Statement of Common Ground submitted at deadline 1 [REP1-083].	Whilst the detailed design of the Applicant's project is worked up, and the interaction with the detailed design of the Bloor Homes planning application and other committed interactions in this area is refined, it is not possible to narrow the extent of order powers sought over this plot and flexibility is required at this stage to ensure that a design solution can be established within the Order Limits. However the Applicant and Bloor Homes have worked up nearly final Heads of Terms and are moving to prepare and agree a legal agreement to ensure that the mechanisms and necessary protection for Bloor Homes is incorporated to ensure that both projects can move forwards by co-operation once detailed designs are known and that the extent of compulsory acquisition powers will be limited to what is necessary to provide access for the Authorised Development on a temporary and permanent basis once the route is capable of being established.
		<u>Land Parcels 6/71 and 6/71b</u> Bloor has concerns regarding the other land coloured brown on the Land Plans, including parcels 6/71 and 6/71b. Should these be fully acquired by the Applicant, this would have very significant adverse consequences for the Bloor scheme. It is Bloor's understanding, through discussions with the Applicant, that a relatively small proportion of the brown land is actually required for all 3 parcels, it is Bloor's view that compulsory acquisition is not necessary, and instead Bloor (or the landowner ahead of Bloor's acquisition) could retain the land and grant the Applicant rights as necessary. Moreover, permanent access to NG apparatus ought to be capable of taking place over the estate roads once constructed. Negotiations with the Applicant have been positive and the dropping of option A is helpful to Bloor.	The parties are working together to negotiate the terms of a legal agreement that will narrow down the extent of the land take required to the necessary alignment once the detailed design of both parties' proposals is known. Such an approach will also seek to utilise the Bloor estate roads for permanent access once they have been constructed subject to the grant of all necessary land rights to the extent that any such roads are not part of the adopted public highway. The Applicant is negotiating voluntary land rights but requires TP and CA powers until such time as all necessary land rights have been acquired by agreement. The parties are working together to find a solution which mitigates the impact on the Bloor Homes site, whilst ensuring that the Authorised Development can be delivered.
		Bloor objects to both the compulsory acquisition and temporary possession powers sought by the Applicant in respect of the Bloor Scheme land, to the extent that these are not reduced in size, changed to temporary or regulated by a binding legal agreement to reflect the commitments given. In terms of the relief being sought Bloor would still like to see the land plans amended and a commitment to locate the permanent overhead line as far north in the site as possible. Importantly the commitments set out in the SoCG need to be secured in a legal agreement. Bloor has received HoTs for such an agreement and	As above the legal agreement that the parties are seeking to conclude during the Examination should address Bloor Homes' concerns, including seeking to address Bloor's requirements around providing comfort in respect of the impact of the extent of TP and CA powers on prospective purchasers and funders.

Party	PINS ref	Third party comment	Applicant's Response
		understand that the negotiation of the agreement will progress with the aim of completing the same during the Examination. Taken at face value, the Land Plans suggest a fundamental constraint to the Bloor scheme which if viewed by prospective purchasers would cause alarm and the ability to secure finance for the purchase of a dwelling. Moreover, if the permanent acquisition was simply exercised without regard to the agreed matters then that would remove the access to a strategic housing site.	
		In respect of the Public Sector Equality Duty under section 149 of the Equality Act 2010, Bloor notes that the Bloor Scheme will deliver a significant quantum of affordable housing and community infrastructure serving a diverse local community. To the extent that the exercise of Compulsory Acquisition and Temporary Possession powers delays or reduces the delivery of these benefits, the decision-maker should have regard to the duty to advance equality of opportunity and foster good relations between persons who share relevant protected characteristics and persons who do not.	Noted.
Gary and Julie Sharp	**[REP4-392]**	There has been a total lack of engagement and at no stage has the Applicant sought to obtain information from our clients to truly understand the farming operations and the complexities of works being carried out on the Estate with livestock present. Further there has been no attempt to engage with Mr and Mrs Sharp about the various development projects underway on the Estate. Requests for costs undertakings from NG to support any early discussions have been declined. When our clients have managed to speak with the agents the approach has been that 'we are not asking you' or 'we are telling you' and that is wholly unacceptable in light of the impact this has on my clients farming operations and their lives. A meeting has very recently been proposed; it remains unacceptable that there has been no meaningful attempt to engage at any earlier stage.	Over the past four years, the Applicant has made continual attempts to engage with the Affected Party (AP) to meet and discuss the Project and the potential impacts on the AP's land. On the 17 April 2026 an electronic copy of the V2 Heads of Terms was sent to the appointed solicitor with an offer of a site meeting to discuss further. The meeting was held on the 22 May 2026 on-site with the solicitors, AP, Fisher German and the Applicant in attendance. An undertaking was provided for the AP's solicitor to be in attendance. Following this first in-person meeting, all parties agreed to continue meaningful meetings, with some actions agreed to be completed, for discussion at the next planned meeting on 12 June 2026. These include the provision of Health and Safety Risk Assessments, and KML overlay for development review.
Gary and Julie Sharp	**[REP4-392]**	The proposal will have a significant impact on part of the estate: • Pylons are proposed to be erected on the footprint of an essential agricultural farmworkers cottage located next to one set of the four sets of barns;- 25/00542/FUL Construction of a detached agricultural workers dwelling with cart lodge and store, associated parking and amenity areas (self-build); Land at Margaretting Hall Estate High Street Ingatestone Essex – granted • The path of the pylons will run through the following consented barns and farmyard; 23/00453/FUL Construction of hay barn; Land at Margaretting Hall Estate	On provision of more details provided at the meeting on 22 May 2026, the Applicant will be reviewing the proposed impact to understand potential mitigation measures. An update is to be provided in the next proposed meeting with the Affected Party in June 2026. The Applicant does however note that the identified position of the proposed agricultural dwelling appears to be in conflict with an operational high pressure gas pipeline (within the zone that would be expected to be free from regularly occupied buildings).

Party	PINS ref	Third party comment	Applicant's Response
		Church Lane Ingatestone Essex 23/00454/FUL Construct detached Cow Barn (1); Land at Margaretting Hall Estate Church Lane Ingatestone Essex 23/00455/FUL|Construct detached Cow Barn (2); Land at Margaretting Hall Estate Church Lane Ingatestone Essex 23/00456/FUL Construct detached Cow Barn (3); Land at Margaretting Hall Estate Church Lane Ingatestone Essex • A site compound and an access road will run through the proposed site [near Church Lane] of a further set of barns.	
Gary and Julie Sharp	**[REP4-392]**	The proposal seeks to make use of the network of farm roads on the Estate during the construction phase and that will be in conflict with the farming operations. No discussions have taken place to understand this conflict. During the construction phase a large part of the Estate will simply be unusable as it is not possible for works to be carried out with cows present on that part of the Estate. This will all have a significant impact on our client's farming operations and require a total change in approach to the current management regime; this will necessitate a reduction in the size of the enterprise which in turn will impact the viability of a business that has been grown from scratch for the past 20 years and is now flourishing.	It was explained to the Affected Party during the meeting on 22 May 2026 that these routes have been identified for the maintenance of the line once construction has been completed and will not be used for construction purposes. Conversations were started on how the construction can allow the Estate to continue its current farming practice; this conversation will continue with all reasonable avenues explored to mitigate impact.
Gary and Julie Sharp	**[REP4-392]**	The pylons will have a clear and harmful impact on the setting of grade II listed Margaretting Hall and the ancient lane leading up the historic grade I listed church. A farmworkers cottage was recently refused planning permission for its alleged harmful impact on the setting of these heritage assets (Ref 22/01077/FUL – Chelmsford). The pylons will have a far greater effect. To what extent has there been a sequential test in terms of impact on all of the heritage assets that are along the routes and proposed routes? Have these two heritage assets been given adequate or particular consideration compared against the harm to other heritage assets that have been mentioned?	The assessment of setting and impacts has been informed by site visits, aerial and street-view imagery. The result of this assessment is that the asset is expected to experience Mid Less Than Substantial Harm. Whilst the Applicant agrees that the pylons will be visible from the asset and that the asset shares a historical functional relationship to the landscape, the Applicant believes the assessment of impact is proportionate and appropriate. A previous comment reviewing the Applicant's assessment of the setting of Margaretting Hall can be found in **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]**. Church Lane which leads to the asset and the neighbouring Grade I listed church is not recorded as a Protected Lane by the Local Planning Authority and as such no assessment of impact has been made to the lane. Regarding cumulative impacts and harm to multiple heritage assets, please see response to ExQ1 HE 1.8 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and further comments regarding weighting given to harm to multiple assets is discussed in **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]** question 1. The approach is in line with legislation, policy and guidance, which considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England[16] 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[17].

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

[17] Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

Party	PINS ref	Third party comment	Applicant's Response
Gary and Julie Sharp	**[REP4-392]**	Temporary use of a large construction compound on part of the Estate is proposed where new agricultural barns have been proposed. No justification has been provided as to why such a large area is required for this purpose. Without such justification Mr and Mrs Sharp consider that it is not reasonable, proportionate or necessary for NG to proceed with the proposed temporary use of this part of the Estate. There will be an unreasonable unnecessary and disproportionate impact on Mr and Mrs Sharp's interests and agricultural operations as a result of the exercise of compulsory powers under the Scheme.	The necessity, scale and size of the proposed compound was explained to the Affected Party at the meeting held 22 May 2026; further to this, the Applicant is now reviewing the proposed interaction.
Gary and Julie Sharp	**[REP4-392]**	No alternative routings were discussed with Mr and Mrs Sharp prior to the application. It is not clear the extent to which any alternatives were contemplated/investigated by the Applicant prior to application which might have led to a less impactful outcome insofar as the Fristling Hall Estate is concerned.	The Applicant summarised the routeing around the Affected Party's land on pages 28–29 of **8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301]**. Specifically, alternative alignments routeing to the east of Margaretting were presented in **7.21 2024 - Design Development Report for the Project [APP-359]** paragraph 5.4.197 (pages 84–85).
Gary and Julie Sharp	**[REP4-392]**	In terms of impact on proposed development, a scheme of 220 houses is in the process of being submitted to Brentwood Council to seek to address, in part, the lack of housing provision in the borough and meet the identified need. (Planning portal reference PP-13798030 – site overlay attached showing redline boundary of development site edged red). The location of this proposal has been chosen carefully at a position at the outer perimeter of the Estate where it will have least impact on agricultural operations and in a location brought forward within the Local Plan process. The proposed route of the pylons runs through the middle of the scheme and will mean that it will not be possible to develop large parts of the housing proposal for much-needed homes in Ingatestone. Any public interest case for the pylon scheme needs to be balanced against the unreasonable, unnecessary and disproportionate interference the exercise of compulsory acquisition powers associated with the Scheme will have on Mr and Mrs Sharp's interests and farming operations and also on the public interest in ensuring enough homes come forward through accepted planning channels to meet national housing need in appropriate locations.	The Applicant has set out in all the Design Development Reports (most recently at Section 2.6 of the 2025 version (**5.15 Design Development Report [APP-122]**) which developments it takes into consideration in the development of its proposals. The Applicant's position is that this is reasonable and proportionate and inappropriate for speculative proposals and aspirations to restrict critical national infrastructure projects. In this instance no qualifying development proposals were identified. The Applicant would also note the successful completion of many residential developments in close proximity to its infrastructure and has published guidance available for developers.
Little Wenham Hall Farm Partnership (Camilla MacAdam and Andrew Buxton).	**[REP4-383]**	Little Wenham Castle is a scheduled monument and sits with seven other Listed Buildings. The Applicant has said that Little Wenham Castle would experience harm (lower level of less than substantial). Historic England disagrees and assess it as mid level. The NPPF requires consideration of the setting which can cause less than substantial harm if it diminishes an assets significance and goes on to say that the threshold for acceptable harm is exceptionally high for scheduled monuments. Given the requirements of the 1979 Act and the NPPF guidance it cannot be right for National	A response to concerns raised regarding the Scheduled Monument of Little Wenham Castle and associated Listed Buildings was provided by the Applicant in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 76–77 and 222–224. The Applicant acknowledges that there will be visibility of some of the pylons from the Castle roof; however, the presence of pylons within a view from such an asset does not in itself equate to the setting of that asset extending to the Order Limits nor being unacceptably affected. Comments from Historic England and response from the Applicant are provided in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 76–77. **Regarding** Little Wenham Castle and intervisibility they are as follows, '*The*

Party	PINS ref	Third party comment	Applicant's Response
		Grid to set the benchmark at substantial harm. National Grid appear not to have noticed that the view from the Castle north looks straight at the J27AngleTower across completely flat agricultural land which is a direct contravention of the Holford Rules. It is clear from the visual reproduction submitted by National Grid (7.12.F209_HE3e Viewpoint8 E3LittleWenhamCastte) that other pylons to the north and south of J27 are also clearly visible. There is also a more limited view of the J35 cable sealing end. Historic England say, rightly, that the views from the castle roof should not be underestimated because most visitors will judge the setting from there. The 'partial screening' cited by National Grid is merely high bushes along an old railway line and provides very little screening in relation to the high pylons. It is unfortunate for National Grid that the surrounding Suffolk farmland is so flat so high pylons are visible for a long way. National Grid have not commented on the number of people who use the local footpaths and therefore whose views of the Little Wenham complex would be affected. There are about 4.5 miles of footpaths and bridleways on the farmland owned by the Little Wenham Farm partnership and crossed by the pylon line, surrounding the Little Wenham complex, and they are heavily used by the residents of Capel St Mary. We have suggested a number of ways of mitigating the harm to the Little Wenham complex and the castle, all of which have been rejected by National Grid. • Move the line from the CSE J35 northwards behind or through Brimlin Wood. National Grid say this would have a negative effect on existing dwellings. • Use T-Pylons which are lower and less visible. National Grid say that these have unspecified disadvantages and are also more expensive. We have been told in writing that National Grid is required by law to accept the lowest cost. • Underground the north of the J35 CSE to north of J21, which would be more expensive.	*importance of views from the Castle roof should not be underestimated, showing as they do the landscape in which it functioned as still largely agricultural in character, but we would agree with the applicant's assessment, although the harm might be closer to a mid-level'.* This response from Historic England states they agree with the Applicant's assessment of Less Than Substantial Harm, although they allow the possibility it may be mid rather than lower less than substantial harm. Historic England also state regarding the Grade II* listed barn that they consider the significance of the asset would also be harmed at a low level of Less Than Substantial Harm. Historic England did not comment on the Grade I assets Wenham Castle and Church of St Lawrence in its written representation **[REP1-191]**, and so it is assumed it agrees with the Applicant's assessment. The Applicant is confident that the assessment is robust and proportionate, and that the methodology which has been discussed with Historic England and relevant Local Planning Authorities heritage advisors, has given appropriate weight to the potential impacts of the Project on these designated assets. The Public Right of Way user counts for those routes within the study area (i.e. Order Limits) are presented in **6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273]**.
Palmer & Klein	**N/A**	Did not provide an oral summary at Deadline 4.	N/A

5.3 Applicant's Response to Further Submissions That Were Not Given Orally at CAH2

5.3.1 Table 5.3 sets out the Applicant's response to further submissions that were not given orally but that are related to items on the CAH2 agenda.

Table 5.3 Applicant's Response to Matters Raised in Response to CAH2

Party	PINS ref	Third party comment	Applicant's Response
Clarke & Simpson	**[REP4-355]**	We are land agents to a number of affected landowners along the route. We raised points in March with the Applicant on the HoT that remain unanswered. The HoT set out by National Grid at this stage are entirely unacceptable for landowners to sign and accept.	The Applicant has undertaken a staged programme of Heads of Terms (HoTs) engagement, commencing prior to submission with engagement letters and template HoTs issued to all Category 1 persons. This was followed by the widespread issue of populated HoTs on a section-by-section basis in advance of submission and continuing thereafter. HoTs have been updated and refined iteratively, including the issue of revised versions during Examination, with ongoing discussions taking place with landowners and their agents. This approach demonstrates that the Applicant has actively and meaningfully sought to secure the necessary land rights by voluntary agreement, applying a proportionate approach whereby HoTs are progressed where appropriate rather than issued universally. Since the last round of hearings, the Applicant has continued to work with Affected Parties and their appointed agents and has made further amendments to the HoTs.
		We have had no detail on the HoT, whether any additional surveys need to take place or any strategy for drainage reinstatement. Using archaeology as an example, there has been no information about surveys for archaeology along the routes of UKPN works because National Grid are only undertaking surveys for their proposed infrastructure.	A meeting was held with the agent on 13 May 2026 to discuss the Heads of Terms in detail. Comments were received and are being considered by the Applicant. A further meeting has been arranged to continue discussions on 4 June 2026. The scope of any further surveys is considered on a case-by-case basis having regard to the requirements of the Proposed Development and reasonable access arrangements. With regard to drainage reinstatement, this is addressed through the Outline Code of Construction Practise and secured requirements, with site-specific detail to be developed at the detailed design stage in consultation with affected landowners. In respect of archaeology, the Applicant is progressing surveys proportionate to its Proposed Development.
David John Mason	**[REP4-389]**	We are anxious about the disruption during construction. Inevitably the noise. dust and road closures will affect how we live our lives and on the enjoyment of local footpaths. Also concerns about cycling along local roads such as Hungerdown Lane impacted by construction traffic. Another area that is making us anxious, should these proposals go forward, is the lack of requirement for these major projects to coordinate their construction schedules. Without adequate coordination the length of time we, and particularly Little Bromley residents, will be impacted will be unnecessarily extended. We worry about this because during discussion about mitigation work, for , by NG in readiness for construction traffic using Bentley Road, the point was made from the floor that NF/FE intend building a haul road to their substation site to reduce pressure on Bentley Road. The question was asked whether NG would be using this haul road. If I heard correctly NG responded by saying they would use it if the construction schedules of the two projects aligned. I understand that to mean they don't think that is likely, which raises more questions.	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. Short-term road closures associated with overhead line stringing, construction of highway mitigation works, construction of site access and crossover bellmouths and the open-cut cable swathe are expected on some of the roads, as detailed in paragraph 5.8.10 of **7.3 Outline Construction Traffic Management Plan [Revision D]**. Coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. **7.3 Outline Construction Traffic Management Plan [Revision D]** details the routeing strategy for construction vehicles. The Applicant is proposing to route construction traffic along Primary Access Routes from the Strategic and Major Road Networks to the site access points. Hungerdown Lane is not a Primary Access Route and therefore will not be used by construction traffic to access the site. A crossover point is located on Hungerdown Road (JC-B067 and 068) as shown on Sheet 14 of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [REP4-019]**. Construction traffic using this crossing point will be required to give way to local traffic, including cyclists. The Applicant has committed to coordination with North Falls and Five Estuaries Offshore Wind Farms as set out under the Tripartite Position Statement within Appendix B of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]**. The position with respect to site access is described under Sections 6.1 to 6.6 of this appendix, and the

Party	PINS ref	Third party comment	Applicant's Response
			agreement is that the Project will utilise their temporary haul road if it is available. The Applicant will ensure liaison takes place by the Main Works Contractor(s) with other developments, including North Falls and Five Estuaries Offshore Wind Farms to ensure a coordinated approach to construction traffic management. Section 6.6. of **7.3 Outline Construction Traffic Management Plan [REP4-174]** was updated at Deadline 4 to reflect the Applicant's commitment to joining and engaging with a Developer's Forum to be set up by Essex County Council, subject to agreeing suitable terms of reference, to continue and formalise project coordination. The Applicant envisages that when the build programmes are available from the Main Works Contractor(s) these will be brought to the Developer's Forum and discussed in conjunction with the development of the Final Construction Traffic Management Plan.
David John Mason	**[REP4-389]**	There is a lack of coordination between the construction schedules of the different projects, which will mean the length of time Little Bromley residents, are impacted will be unnecessarily extended. Is there any requirement for the two projects to talk to one another and coordinate project planning to reduce the impact on local communities? If there is not close coordination between these projects to reduce impact on local communities then once again the financial needs of these large companies are given far more weight than the needs and welfare of the local community.	There is no explicit statutory requirement under the Planning Act 2008 for separate Nationally Significant Infrastructure Project promoters to coordinate construction programmes or sequencing across different projects. Each scheme is considered and consented on its own merits through an individual Development Consent Order, which primarily regulates the delivery of that specific project. However, applicants are required to assess cumulative effects with other existing and committed developments as part of the Environmental Impact Assessment process. This includes identifying overlapping construction periods and assessing the combined effects on receptors such as local communities, traffic movements and amenity. The Examining Authority will scrutinise whether reasonable steps have been taken to identify, assess and mitigate these combined impacts. In practice, coordination between projects is encouraged through engagement with other promoters, local authorities and statutory bodies, and through the development of mitigation measures (such as construction traffic controls and management plans). However, alignment of construction programmes is not guaranteed and is not a prescribed outcome of the regime. Instead, impacts are considered on a case-by-case basis, with mitigation secured where necessary to make the residual effects acceptable. The Applicant can confirm that they are actively engaging with the other projects and will continue to so throughout the planning and construction stages of the Project.
David John Mason	**[REP4-389]**	We are also anxious about how this project might affect our future plans to move house. It is hard to see how a purchaser will want to pay a current market price for a property that is surrounded by construction work	The Applicant's financial governance, including the treatment of land acquisition and compensation, operates within established corporate, regulatory and audit frameworks. The Applicant is committed to compensate for losses arising as a result of construction, including disturbance, severance, and losses arising from restrictions on land use or agricultural operations. Where ongoing future losses in land productivity or businesses can be evidenced and attributed to the Project, such matters fall to be assessed and, where justified, compensated in accordance with the Compensation Code.

Party	PINS ref	Third party comment	Applicant's Response
East Anglia One OFTO Limited	**[AS-091]**	The OFTO first became aware of the Norwich to Tilbury project on 2 February 2026. Prior to that date, the OFTO had not been consulted in respect of the project and had not been identified within the Book of Reference, despite owning and holding registered property interests in the East Anglia One transmission assets since 2023. Following notification, the OFTO attended meetings with NGET on 11 and 25 February 2026 to discuss the interface between the Project and the OFTO's assets. Notwithstanding these discussions, and repeated subsequent attempts by the OFTO to progress matters, there has been no substantive or meaningful engagement by the Applicant, nor has adequate detail been provided to enable the OFTO to understand or assess the impacts of the authorised development. The position set out in the OFTO's representation submitted on 11 February 2026 therefore remains unchanged. The draft DCO seeks powers to enter, occupy and compulsorily acquire land and rights affecting the OFTO's operational electricity transmission assets. The Applicant's own documentation indicates that the project anticipates approximately 94 interface or crossing points affecting the OFTO's infrastructure. Of particular concern is the inclusion of Plot 20/199, comprising the OFTO's operational substation, within the Order limits. The OFTO considers this entirely unacceptable in its current form. No justification has been provided for the inclusion of compulsory acquisition powers affecting the OFTO's land or rights. The OFTO considers it essential that the dDCO Order includes bespoke protective provisions, specifically tailored to assets owned and operated by an offshore transmission owner. In addition, the OFTO considers that the inclusion of its land and assets within the Order engages section 127 of the Planning Act 2008. In the absence of agreement, the statutory test in section 127 cannot be satisfied, as the proposed compulsory acquisition and use of the land would give rise to serious detriment to the carrying on of the OFTO's statutory undertaking. Accordingly, TC East Anglia One OFTO Limited maintains its objection to the development as currently drafted.	The Applicant has since reached out to OFTO to seek to address any concerns at pace and a meeting is being arranged for week commencing 15 June 2026 between both parties. Regarding the 94 identified interfaces identified between the Applicant' project and OFTO related infrastructure, these interfaces are all confined to the Bramford substation and East Anglian One onshore substation surrounding area. The Applicant will continue to engage with OFTO to define each of these but it is anticipated and as discussed with OFTO in a previous February 2026 call that these will be much reduced pending that engagement. The Applicant fully acknowledge that OFTO is a separate entity from Scottish Power Renewables Ltd (SPR) while also acknowledging a potential overlap in concerns and mitigation sought due to the nature of both parties interest, with SPR consent a copy of the SPR SoCG and details of conversations to date progressing requested protections and mitigations have been shared with OFTO in the event that these previous conversations and outcomes agreed aid in accelerating the dialogue with OFTO. Previous conversations in this also propose a potential solution to the specific plot identified by the respondent among other matters.

Appendix A. Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury

Appendix A Proposed Approach to adopting DESNZ Requirement Discharge Unit for Norwich to Tilbury

A.1 Rationale

Introduction and Overview

A.1.1 Government has indicated a new unit will be established within DESNZ to coordinate post-consent discharge functions for electricity network projects. In light of that, the Applicant is proposing amendments to the draft DCO to provide a mechanism for that DESNZ unit to have jurisdiction in respect of the discharge of requirements.

A.1.2 By way of background to this proposal, the Applicant notes that the Nuclear Regulatory Review 2025 (known as the "**Fingleton Review**") is a report prepared by an independent taskforce (appointed by the Prime Minister), led by John Fingleton, looking at where radical reforms could be proposed to regulate nuclear energy in a way that promotes better delivery without compromising safety. The Fingleton Review made various recommendations, including some with wider applicability to development consent orders for nationally significant infrastructure projects. Under the heading "Establishment of Central Government Discharging Function for DCOs", the Fingleton Review set out as follows at its Recommendation 30:

"DESNZ should establish a unit which discharges DCO Requirements. Guidance issued by MHCLG should be updated to endorse the use of this unit as the discharging authority for DCOs relating to nuclear development. Local authority involvement in the discharge of conditions can be secured through a requirement for consultation prior to submission to the Department."

A.1.3 The Government published a policy paper on 13 March 2026, entitled "Building our nuclear nation: government response to the Nuclear Regulatory Review 2025" ("**Fingleton Response**"), in which it formally responded to the Fingleton Review. In relation to the Fingleton Review's Recommendation 30 the Response stated as follows:

"The government accepts this recommendation. DESNZ will establish a new unit within its Infrastructure Planning Delivery team to consolidate and deliver post-consent discharge functions in consultation with Local Authority Planning Departments. This will speed up decisions on the meeting of post-consent requirements. This will be focussed initially on nuclear power and electricity networks projects, with a view to extending this to other types of energy projects if evaluation of its effectiveness supports its expansion."

A.1.4 Given the endorsement of Recommendation 30 of the Fingleton Review by the Government, and the commitment for DESNZ to establish a new unit to deal with post-consent discharge functions for electricity networks projects, the Applicant considers that it is prudent to seek to anticipate the establishment of this DESNZ unit by providing for it in the drafting of DCOs granting consent for electricity networks.

The Applicant's Proposed Approach

A.1.5 The Applicant set out its response to **First Round of Questions DCO 1.S19 in [REP3-074]**. The Applicant set out that it is supportive of this approach and is keen to understand how such a unit might operate in practice, the scope of requirements it may discharge, and how it would interface with Local Planning Authorities and other statutory bodies. The Applicant recognised in response to that question that it may seek to provide alternative drafting options to be considered in the examination in the future.

A.1.6 It is noted that DESNZ have responded to the **First Round of Questions DCO 1.S19 on Norwich to Tilbury [REP3-182]** confirming the government commitment to establishing a new unit in DESNZ to deliver post-consent discharge functions in consultation with Local Authority Planning Departments. DESNZ note that work on this unit has been initiated, and that they intend to publish an operational framework and accompanying guidance and will set out further details of the schedule in due course. The programme for this is awaited and it is not currently known if it will come forward during the course of the examination.

A.1.7 It is noted that Section 120 of the Planning Act 2008 provides that a DCO may impose requirements to obtain "the approval of the Secretary of State or any other person", i.e. a DCO is lawfully capable of providing for any the DESNZ unit exercising such post-consent discharge functions.

A.1.8 The Applicant recognizes that multiple Local Authorities have responded to the first written question on this matter with multiple views being provided across the Local Authorities. The Applicant has continued to consider this approach in the interest of this project and will continue to discuss this matter further with the Local Authorities. This proposed approach has been discussed at meetings held with the Local Authorities on the 21 May and 4 June 2026.

A.1.9 In this note, the Applicant therefore sets out proposed drafting that will be incorporated into the draft DCO for Norwich to Tilbury (to be submitted at Deadline 6) to facilitate the discharge of requirements by a DESNZ unit, should it be established in the future.

A.1.10 In summary, the proposed drafting below would enable the functioning of the DESNZ unit, if and when established, in respect of applications to discharge requirements set out in Schedule 3 to the draft DCO. The drafting then provides that it would be at the election of the Applicant in each case. Where DESNZ is the determining body, then the body named in the Requirement would become a requirement consultee.

A.1.11 National Grid has recently made a submission to the examination for its Sea Link project, providing drafting for inclusion in that draft DCO to make provision for the DESNZ unit. The drafting proposed in this note is closely based on that drafting, with minor amendments to reflect some small differences in the 'project specific' drafting of the draft DCOs for Sea Link and Norwich to Tilbury.

A.1.12 The drafting allows for the Applicant to elect whether it utilises the DESNZ unit or not (once established) which is considered an appropriate approach given it is unknown at this stage how any DESNZ unit will operate.

A.1.13 Such an approach is appropriate as there is a balance to be struck with, on the one hand putting in place a mechanism by which a new unit aimed at more effectively enabling projects post consent can be utilised and supported, whilst on the other ensuring that a

nationally significant infrastructure project, with critical national priority, is not held up unnecessarily during the bedding-in period whilst the new unit becomes fully operational and effective.

A.1.14 The proposed drafting also allows the Applicant to seek discharge of requirements where the local planning authority would be better placed to have that role. As the Fingleton Review acknowledges, for the discharge of requirements for most DCOs at present "Local authorities are chosen for their local knowledge". The local knowledge and expertise of the local authorities may mean that in some instances they are better suited to being the discharging authority, and, coupled with the above point, given the proposed DESNZ unit is aimed at achieving greater efficiencies for nationally significant projects, it is appropriate that the discharging authority can be selected based on what is likely to be the most appropriate avenue for discharge of a requirement.

A.1.15 Currently it is not unusual in energy DCOs, particularly for very large or linear schemes crossing multiple local authority areas, for there to be different discharging authorities for the one project (often there will be multiple host district councils who will be the discharging authority for their area, and for some requirements such as transport or archaeology, the discharging authority may be the county council). Despite this practice, the key driver in the Fingleton Review for the introduction of the new DESNZ unit relates to delays in discharge of requirements (associated with local authorities being resource constrained or having an in-principle objection to certain kinds of development), not lack of oversight. The Fingleton Review does note that an added advantage of the DESNZ unit would be that it would ensure consistent decision making, however, that is not what is driving the recommendation (see for example the Government's response in which it states that the new unit "will speed up decisions on the meeting of post-consent requirements").

A.1.16 Consistency and oversight is in any event achieved by:

1) The inclusion of local planning authorities as consultees where the DESNZ unit is the discharging authority, meaning for a requirement in their area the local planning authority will have involvement and input to a discharge of requirement either by being a consultee or the discharging authority.

2) The ability under the ‘Procedure for Discharge’ schedule in the draft DCO for the discharging authority and consultees to request further information within the timescales set, which could be utilised to request information to ensure consistency with other requirements.

3) The requirements would be discharged within a framework which has been examined by the Examining Authority, and considered and approved by the Secretary of State, taking into account input from the local authorities and other stat consultees. There is therefore a very clear set of controls in place, to provide for consistency in the discharge of requirements, regardless of the identity of the discharging authority. That set of controls is achieved by a consistent approach throughout the DCO to how the requirements are drafted, by the inclusion of statutory bodies as consultees if required, and by securing control documents and plans that have been through examination and have evolved in discussions with other parties. There is therefore not a wide ranging discretion in the discharge of requirements for significant inconsistencies to arise.

4) In practice, an applicant choosing who would be the discharging authority for a requirement will be alive to the potential for minor inconsistencies resulting from discharging requirements via different authorities and will take that into account both in electing the discharging authority as well as in the information that is provided with the application to discharge a requirement.

A.2 Proposed drafting amendments to Norwich to Tilbury draft DCO to facilitate discharge of requirements by DESNZ unit

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
Article 2 (interpretation)	**Interpretation** "relevant planning authority" means, in any given provision of this Order (except article 56 (safeguarding)— a) for an area to which the provision relates in respect of which there is both a district planning authority and a county planning authority for the purposes of Part I (Planning Authorities) of the 1990 Act, the district planning authority; and b) for an area to which the provision relates in respect of which there is only one local planning authority for the purposes of that Part, that one local planning authority, or any successor exercising its functions as local planning authority for the purposes of that Part;	**Amend as follows:** "relevant planning authority" means, in any given provision of this Order (except in article 56 (safeguarding) and subject to paragraph 1(6) of Schedule 3 (requirements) and paragraph 1(1) Schedule 4 (discharge of requirements))— c) for an area to which the provision relates in respect of which there is both a district planning authority and a county planning authority for the purposes of Part I (Planning Authorities) of the 1990 Act, the district planning authority; and d) for an area to which the provision relates in respect of which there is only one local planning authority for the purposes of that Part, that one local planning authority, or any successor exercising its functions as local planning authority for the purposes of that Part;
Article 55 (procedure regarding certain approvals etc)	**Procedure regarding certain approvals etc.** 55.—(1) Where an application or request is submitted to a relevant planning authority, a highway authority, a street authority or the owner of a watercourse, sewer or drain for any consent, agreement or approval required or contemplated by any of the provisions of this Order such consent, agreement or approval, if given, must be given in writing and must not be unreasonably withheld or delayed.	Amend sub-paragraph (1) as follows: (1) Where an application or request is submitted to a relevant planning authority, a highway authority, a street authority or the owner of a watercourse, sewer or drain for any consent, agreement or approval required or contemplated by any of the provisions of this Order such consent, agreement or approval, if given, must be given in writing and must not be unreasonably withheld or delayed; and in this paragraph references to the relevant planning

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
		authority and highway authority include where the DESNZ unit is treated as such for the purposes of a requirement.
Schedule 3 (requirements)	**Interpretation** (1) In this Schedule unless the context requires otherwise— […] (2) Where under any of the requirements the approval or agreement of the relevant planning authority or the relevant highway authority is required, that approval or agreement must be given in writing. (3) Where any requirement requires the authorised development to be carried out in accordance or in general accordance any document, plan, drawing, strategy, statement, details or other information approved by the relevant planning authority or the relevant highway authority, such document, plan, drawing, strategy, statement, details or other information are to be taken to include any amendments that have been subsequently approved in writing by the relevant planning authority or the relevant highway authority in question. (4) Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority	Add to paragraph 1(1): "DESNZ unit" means a group or body set up by or on behalf of the Secretary of State for the purpose of providing any consent, agreement or approval required by requirements contained in development consent orders including the requirements in this Order; Insert a new sub-paragraph (6) in paragraph 1: (6) From the date of receipt by the undertaker of written notice from the Secretary of State that the DESNZ unit has been established, for the purposes of each requirement in this Schedule or any document referred to in any such requirement, the "relevant planning authority" (and in paragraph 7(3) of this Schedule the "relevant highway authority") means either— (a) the DESNZ unit; or (b) the body that would otherwise have been the "relevant planning authority" for the purposes of that definition in article 2 (interpretation) (and in paragraph 7(3) of this Schedule the body that would otherwise have been the "relevant highway authority" for the purposes of that definition in article 2 (interpretation)) if not for the establishment of the DESNZ unit, in each case as identified by the undertaker pursuant to paragraph 1(1) of Schedule 4 (discharge of requirements).

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
	that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement. (5) Unless otherwise provided in this Order, where a requirement relates to a specific site, work or stage and it specifies "commencement of development", it refers to the commencement of development on that site or in relation to that work or stage only.	
Schedule 3 (requirements)	**7. Construction hours** […] (4) The following operations may take place outside the core working hours and, as the case may be, the hours referred to in sub-paragraph (3)— (a) trenchless crossing operations including beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses; (b) the installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses; (c) the jointing of underground cables; (d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; (e) any highway works requested by the relevant highway authority to be undertaken on a Saturday or Sunday or outside the core working hours;	Amend the following sub-paragraphs as follows: (4) The following operations may take place outside the core working hours and, as the case may be, the hours referred to in sub-paragraph (3)— […] (e) any highway works requested by the relevant highway authority or the DESNZ unit to be undertaken on a Saturday or Sunday or outside the core working hours; […] (m) delivery to the transmission works of abnormal indivisible loads and any highway works requested by the relevant highway authority or the DESNZ unit to be undertaken outside the core working hours; and

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
	(f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities; (h) activity necessary in the instance of an emergency where there is a risk to persons or property; (i) security monitoring; (j) non-intrusive surveys; (k) intrusive surveys; (l) oil processing of transformers or reactors in substation sites; (m) delivery to the transmission works of abnormal indivisible loads and any highway works requested by the relevant highway authority to be undertaken outside the core working hours; and (g) an implementation timetable.	
Schedule 4 (discharge of requirements)	**Schedule 4 – discharge of requirements** Paragraph 6 (interpretation of Schedule 4) "the appeal parties" means the relevant authority, the requirement consultee and the undertaker; "relevant authority" means the person or body responsible for giving any consent, agreement or approval required by a requirement, or any document referred to in any requirement, under this Order or	**Schedule 4 – discharge of requirements** Amend Paragraph 1 as follows: 1. —(1) Where notice has been received by the undertaker pursuant to paragraph 1(6) of Schedule 3 (requirements)— (a) the undertaker may make an application for any consent, agreement or approval required by a requirement (including consent, agreement or approval in

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
	(except as provided in article 55(4) any other consent, agreement or approval required under this Order (including the relevant owner of a watercourse, sewer or drain as may be appropriate to the consent, agreement or approval sought); and "requirement consultee" means any body named in a requirement as a body to be consulted by the relevant authority in discharging that requirement. Paragraph 1 (Applications made under requirements) 1.—(1) Where an application has been made to a relevant authority for any consent, agreement or approval required by a requirement (including consent, agreement or approval in respect of part of a requirement), the relevant authority must give notice to the undertaker of its decision on the application within a period of 25 business days beginning with— where no further information is requested under paragraph (2), the day immediately following that on which the application is received by the authority; where further information is requested under paragraph (2), the day immediately following that on which further information has been supplied by the undertaker; or such longer period as may be agreed in writing by the undertaker and the relevant authority. (2) Subject to sub-paragraph (3), in the event that the relevant authority does not determine an application within the period set out in sub-paragraph (1), the relevant authority is taken to have granted all parts of	respect of part of a requirement) or any document referred to in any requirement to either, at the undertaker's discretion— (i) the DESNZ unit as if it were the relevant planning authority for the purposes of the requirement in question (or in paragraph 7(3) of the "relevant highway authority"); or (ii) the body that would otherwise have been the relevant planning authority as defined in article 2 (interpretation) (and in paragraph 7(3) of this Schedule the body that would otherwise have been the "relevant highway authority" as defined in article 2 (interpretation)) if not for the establishment of the DESNZ unit; and (b) in the case of any requirement (including part of a requirement) pursuant to which the undertaker has made such application to the DESNZ unit as the relevant authority, the DESNZ unit must consult with the body that would otherwise have been the relevant authority as if it had been named as a body to be consulted in that requirement and such body shall be treated as a "requirement consultee" for the purposes of this Schedule. 1.—(1) (2) Where an application has been made to a relevant authority for any consent, agreement or approval required by a requirement (including consent, agreement or approval in respect of part of a requirement), the relevant authority must give notice to the undertaker of its decision on the application within a period of 25 business days beginning with—

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
	the application (without any condition or qualification) at the end of that period. (3) Where— an application has been made to the relevant authority for any consent, agreement or approval required by a requirement included in this Order; the relevant authority does not determine such application within the period set out in sub-paragraph (1); and the application is accompanied by a report that considers it likely that the subject matter of the application is to give rise to any materially new or materially different environmental effects to those identified in the environmental statement, then the application is taken to have been refused by the relevant authority at the end of that period.	(a) where no further information is requested under paragraph (2) 3, the day immediately following that on which the application is received by the authority; (b) where further information is requested under paragraph (2) 3, the day immediately following that on which further information has been supplied by the undertaker; or (c) such longer period as may be agreed in writing by the undertaker and the relevant authority. (2) (3) Subject to sub-paragraph (3)(4), in the event that the relevant authority does not determine an application within the period set out in sub-paragraph (1) (2), the relevant authority is taken to have granted all parts of the application (without any condition or qualification) at the end of that period. (3) (4) Where— (a) an application has been made to the relevant authority for any consent, agreement or approval required by a requirement included in this Order; (b) the relevant authority does not determine such application within the period set out in sub-paragraph ~~(1)~~ ~~(2)~~; and (c) the application is accompanied by a report that considers it likely that the subject matter of the application is to give rise to any materially new or materially different environmental effects to those identified in the environmental statement, then the application is taken to have been refused by the relevant authority at the end of that period.

Norwich to Tilbury dDCO ref (REP4-037) (Final Issue D, May 2026)	Norwich to Tilbury current drafting (as at Deadline 4) of potential relevance to discharge of DCO requirements	Proposed new or amended drafting (New wording shown in green)
		(further consequential cross referencing amendments in paragraphs 4(1) and (2) regarding appeals)
Schedule 4 (discharge of requirements)	**Paragraph 3 (Fees)** 3.—(1) Where an application is made to a relevant authority for any consent, agreement or approval required by a requirement (including consent, agreement or approval in respect of part of a requirement), a fee must be paid to the relevant authority as follows— (a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £298 per request unless a bespoke arrangement has been agreed between the applicant and relevant authority and legally secured. (2) Any fee paid under this Schedule must be refunded to the undertaker within 25 business days of— (a) the application being rejected as invalidly made; or (b) the relevant authority failing to determine the application within 25 business days from the date on which it is received, unless within that period the undertaker agrees in writing that the fee may be retained by the relevant authority and credited in respect of a future application.	**Amend paragraph 3 (fees) as follows –** 3.—(1) Where an application is made to a relevant authority for any consent, agreement or approval required by a requirement (including consent, agreement or approval in respect of part of a requirement), other than when the relevant authority is the DESNZ unit, a fee must be paid to the relevant authority as follows— (a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £298 per request unless a bespoke arrangement has been agreed between the applicant and relevant authority and legally secured.

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