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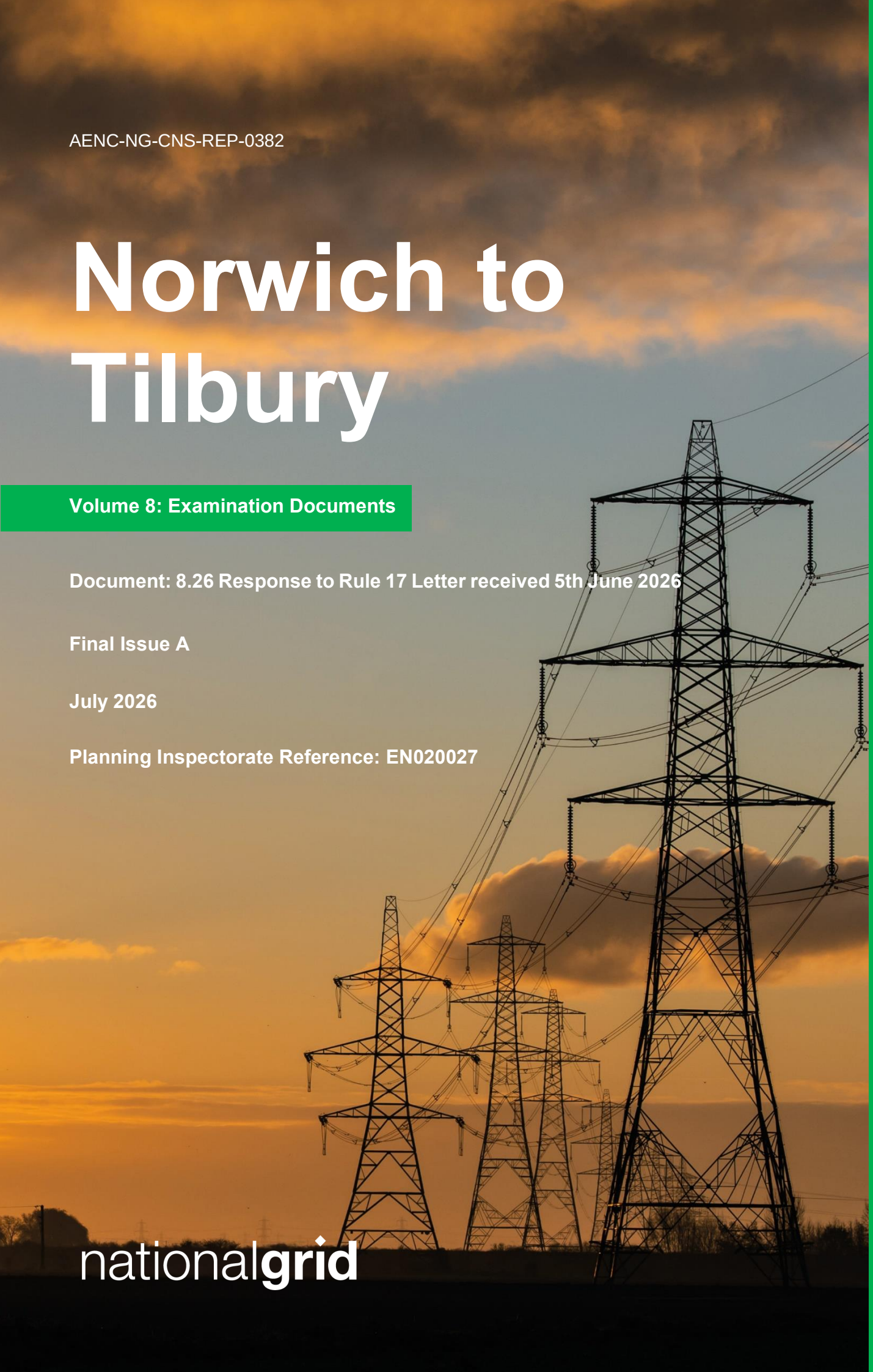

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Contents

1. Introduction

1.1 Purpose of this document

1.1.1 On Friday 5 June 2026, the Examining Authority issued a Rule 17 letter **[PD-027]** requesting responses at Deadline 5A. This related to three matters:

- Applicant's response to interested party comments relating to the historic environment at Issue Specific Hearing 2
- Residential Visual Amenity Assessment
- Biodiversity net gain guidance.

1.1.2 This document provides the Applicant's response to the requests within the Rule 17 letter.

2. Applicant's Response to Interested Party Comments Relating to the Historic Environment at Issue Specific Hearing 2

2.1 ExA Request

2.1.1 *'At agenda item 9 (historic environment) on day 2 of issue specific hearing (ISH) 2 on Wednesday 29 April **[EV9-017 and EV9-018]** the Examining Authority (ExA) proposed that, due to time constraints, it would invite interested parties (IPs) to make verbal representations at the hearing but would put its questions to the applicant relating to heritage in writing.*

2.1.2 *It was agreed that the applicant would respond to both the ExA's written questions and the oral submissions made by IPs at the next deadline.*

2.1.3 *The applicant's response **[REP4-318]** to the ExA's subsequent rule 17 letter dated 7 May 2026 **[PD-020],** and its response to ISH2 action points **[REP4-303],** were submitted at deadline 4. However, the ExA is unable to find the applicant's responses to the oral submissions made by IPs at the hearing in either of these documents (with the exception of Bounds Farmhouse (action point 33)).*

2.1.4 *The applicant is asked to provide a written response to those oral submissions made by IPs at ISH2 in respect of historic environment matters.'*

2.2 The Applicant's Response

2.2.1 The Applicant has responded to the matters raised in ISH2 and we have endeavoured to assist the Examination by providing signposting to this in Table 2.1 .

Table 2.1 Applicant's responses to the historic environment oral submissions at ISH2

Interested Party	Applicant's Response
Historic England	In ISH2Historic England said they would respond in writing, although as of Deadline 4 the Applicant had not seen a written response. Responses to any other points that were raised by Historic England in ISH2 are covered in **8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302]**. The Applicant will respond at Deadline 6 to Historic England's submission at Deadline 5 (**Comments on any further information or submissions received by Deadline 4 [REP5-250]**).
Pylons East Anglia	Pylons East Anglia at ISH2 raised concerns with the accordance of the Historic Environment assessment with NPS EN-1, the conclusions of assessment in particular relating to substantial harm, the application of the methodology for setting assessment, assessment of Fordham

Interested Party	Applicant's Response
	Romano-British villa archaeological site and cumulative assessment. The Applicant has responded to Pylons East Anglia's comments in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses REP5-202]**, in section 3. Many of the points raised had previously been responded to by the Applicant in **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]**, from page 40-49. In addition, the Applicant has responded further on the Fordham Romano-British archaeological site in response to ExQ2 HE 2.11 and HE 2.12 in **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**.
Nicholas Cheeseman	The Interested Party raised concerns at ISH2 regarding the approach to the assessment of Flordon Hall and associated listed buildings. The Applicant has responded regarding the assessment of 'Flordon Hall' (1050698), 'Piggery 60 Yards South of Flordon Hall' (1172231) and 'Barn to Flordon Hall' (1373055) in **8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]**, section 3, **8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]**, section 9, and in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]**, page 140-143. In addition, the Applicant has responded regarding the approach to assessing the value and impact on groups of heritage assets in ExQ2 HE 2.3 **8.9.2 Applicant's Response to Second Written Questions [REP5-211]**, question 4 in **8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]** and in ExQ1 HE 1.8 **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
Chelmsford City Council	The Applicant has responded to Chelmsford City Council's concerns raised during ISH2 regarding assessment of non-designated heritage assets, including the potential for significant effects, in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, page 420-426 and has responded regarding the assessment methodology for non-designated heritage assets in ExQ1 HE 1.38 **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**.
Andrew Buxton	The Interested Party raised concerns in ISH2 regarding the approach to the assessment of Little Wenham Castle and the impact of the Project on this designated heritage asset, including consideration of alternatives. The Applicant responded regarding Little Wenham Castle (1033405/1003759) and the associated listed buildings in **8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]**, page 142-143, and **8.8.1 Applicant's Comments on Written Representations [REP2-029]** pages 76–77 and 222–224.

3. Residential Visual Amenity Assessment

3.1 ExA Request

3.1.1 *'At the Accompanied Site Inspection on Wednesday 27 May 2026 the ExA noted the proximity of cottages 70, 71 and High Hopes, Flordon Road (postal address Norwich Road, Flordon, NR15 1RU) to the Order Limits and their relationship with 72 and 73 Flordon Hall Cottages NR15 1RT. These properties have not been assessed in the* ***Residential Visual Amenity Assessment [REP4-148]****. The ExA requests an assessment of these properties.'*

3.2 The Applicant's Response

3.2.1 An explanation is set out in the paragraphs that follow why these properties were not included in the RVAA at submission, however an assessment of the likely change to their visual amenity as a result of the Project is provided at the specific request of the ExA.

Justification for not Including the three Properties in the Submitted Residential Visual Amenity Assessment

3.2.2 Section 2 of the **RVAA [REP4-148]** sets out the methodology for the inclusion of properties within the assessment. Paragraph 13.2.4 of the **RVAA [REP4-148]** states that those residential properties whose curtilages fall within 200 m of the centre line of the permanent above ground elements of the Project – the 'Study Area', form part of the assessment. Paragraph 13.2.4 clarifies that this distance '*was informed by experience, observations made on site during field surveys and an understanding of the Project*'. It also draws upon the Landscape Institute's 'Technical Guidance Note 2/19: Residential Visual Amenity Assessment' (LI TGN 2/19)[1]. Paragraph 4.7 of LI TGN 2/19 states that *'when assessing effects of overhead transmissions lines, generally only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA*'. The **RVAA [REP4-148]** extends its Study Area up to 200 m in order to allow for the Project's lateral Limits of Deviation (LoD).

3.2.3 As shown on drawing 10059280-ARC-EGN-ZZ-DR-ZZ-00937 - 8.26 Response to Rule 17 Letter received 5 June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road, in Appendix A, the individual curtilage of all three of these residential properties lie outside of the 200 m Study Area. The closest point within the curtilage of 'High Hopes' is 208 m from centre line of the permanent above ground elements of the Project. The corresponding closest part of the curtilage of cottage '70' is 258 m, and for cottage '71' it is 245 m. Consequently, these properties were not included in the **RVAA [REP4-148]** at submission.

[1] Technical Guidance Note 2/19: Residential Visual Amenity Assessment - tgn-02-2019-rvaa.pdf

3.2.4 The **RVAA [REP4-148]** (at paragraph 13.2.4) does recognise, however, that properties outside of the 200 m Study Area may experience significant visual effects. It highlights that: '*Although there is the potential for significant visual effects to occur beyond this distance, such effects are not considered likely to affect 'living conditions"*. Essentially, they are not anticipated to cause a breach of the 'Residential Visual Amenity Threshold' (RVAT). The RVAT is defined in paragraph 2.1 of LI TGN 2/19 as the point '*at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance*'. Paragraph 13.2.26 of the **RVAA [REP4-148]** states that the RVAT is judged by considering whether the Project, for example blocks the only available view from a property, is overwhelming in views in all directions from the property, is unpleasantly encroaching and / or is inescapably dominant from the property.

3.2.5 Visual effects on residential receptors beyond the Study Area are assessed more broadly in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**

Assessment of Effects on Residential Visual Amenity (Step 2 and 3)

3.2.6 Table 3.1 provides a Step 2 evaluation of the baseline visual amenity for 70, 71 and High Hopes, Flordon Road and a Step 3 assessment of the effects on their residential visual amenity. The table also indicates whether or not the assessments should proceed to Step 4. All steps employ the same methodology as set out and used in the **RVAA [REP4-148].**

3.2.7 The assessment should be read alongside –Figure 8.26 Response to Rule 17 Letter received 5 June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road, in Appendix A, and visualisations Figure A13.4.2Aa (xxvi) to Figure A13.4.2Aa (xxviii), in Appendix B.

3.2.8 The visualisations in Appendix B include wirelines and 3D Digital Models to accord with those submitted within **8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 [REP5-205]** to **[REP-5-208].**

3.2.9 The visualisations are not verified views (as data from their locations has not been collected in person) and are seen as a supporting tool for illustrative purposes only, to add further understanding of development and vegetation surrounding each viewpoint.

3.2.10 Trees and hedgerows are presented in winter (i.e. broadleaf without leaves) and therefore show the worst-case scenario. Buildings are presented as white massing models, with building extents, height, roof pitch and shape determined by Lidar Digital Surface Models.

3.2.11 The proposal pylons are based on a single 3D asset generated at the same coordinates as those set out within the Applicant's proposal. These are representative of distance, scale and degree of visibility, but are indicative and may differ in exact architectural form.

3.2.12 The visualisations are produced using the following datasets:

- National Tree Map (demonstrating any trees over 3 m) up to 200 m from selected properties, and indicating their measured height
- Hedgerows digitised by the Project based on ESRI World Imagery Layer at an assumed height of 1.5 m, up to 200 m radius from selected properties.
- Buildings modelled use footprints from Ordnance Survey MasterMap (OSMM) National Geographic Database building dataset up to 1 km radius from selected properties, and indicating their extents, height, roof pitch and shape.
- Lidar Digital Surface Model.

Table 3.1 Assessment of Effects on Residential Visual Amenity

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
(A26)	618084, 298250	274 m (RG22)	S	70, Flordon Road A two-storey semi-detached property with ground floor and upper storey windows on all elevations, apart from upon its party wall with no. 71, Flordon Road to the south. The dwelling's main aspects face west across its driveway onto Flordon Road, north (where the front door is located) to an area of garden, and east across a paved terrace into the remaining area of its garden. The mature vegetation within and	Whilst the closest pylon to the property is RG22 (located 274 m from its curtilage), views to it from the dwelling, and the overhead lines either side of it, would be constrained by the fact that there are no windows in the property directly facing towards it. In addition, available oblique views from the house's windows on its eastern façade, and views from the garden, would be restricted by mature neighbouring vegetation (particularly in summer months), by the single storey wing of No. 71, and by the two storey dwellings of No. 71 and 'High Hopes'. Views eastwards to pylon RG21 and the overhead lines either side	**Low-Medium**	**No**	**No.** In the case of No 70, Flordon Road, the resultant distances between the pylons should they be moved 30 m perpendicularly towards the side of the LoD closest to the dwelling's curtilage (e.g. RG20: 667 m away, RG21; 376 m away and RG22: 242 m away), and

[2] This considers the potential increase in the height of the pylons by 6 m, and the movement of the closest pylons 30 m perpendicularly towards the edge of the lateral Limits of Deviation nearest to the property (the pylon would not move right to the edge of the 50 m Limits of Deviation due to the expected sway / swing of conductors – as outlined in Section 2.4 of 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points **[REP5-194]**). And whether a 'high' magnitude of change would occur, which would trigger a Step 4 assessment.

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				around its garden filters most long and medium distance views from property north and east (particularly in summer months). An area of garden boundary vegetation along its eastern edge, which is lower in height, however, allows some longer views to the north-east. These contain views over the relatively flat, large-scale neighbouring fields. These are then bounded, curtailed and interrupted by woodlands (e.g. Upper Grove Wood), tree belts, lone field boundary trees, and hedgerows. Views from the garden to the south of the property are restricted by mature vegetation in neighbouring properties, by the single storey wing	of it, would be possible from the upper windows of the dwelling (406 m away), but would be constrained by the mature trees and hedgerows that form the intervening field boundaries. This field boundary vegetation, plus other mature vegetation around parts of the property's garden, would combine to markedly restrict views of pylon RG21, and the overhead lines either side of it, from the lower floor windows and from many parts of the garden. There would, however, be clearer eastwards views to pylon RG20 from the upper floors of the property (and from parts of the garden) due to a lack of field boundary vegetation between the two. Given, however, the distance pylon RG20 is away from the curtilage of the dwelling (680 m), it would only form a minor part of the visual scene, and the overhead lines would only just be discernible.			the fact that intervening vegetation and structures would still be present between the property and these, means that a high magnitude of change would not occur. The pylons and the overhead lines between them would still be far enough away not to bring about a large change to views, in the round. They would not become a defining element in any

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				of No. 71 (that extends eastwards from it), and by the two storey dwellings of 71, Flordon Road and 'High Hopes'. Oblique views south-eastwards over the single storey wing of No. 71 are, however, possible from the upper storey windows of the No. 70. A mature tall hedgerow on the opposite side of Flordon Road significantly restricts views westwards (particularly in summer months).	Likewise, whilst the uppermost sections of other proposed pylons further to the north east, and the overhead lines between them, would be visible over the top of surrounding woodlands and tree belts, these too would form very minor parts of occupiers' visual experience. The proximity of these mature woodlands, tree belts and the lone field boundary / hedgerow trees in views from the property would also provide a notable visual backcloth to all visible pylons and conductors. This would further diminish their impact on residents' visual amenity. Views to the north and west of the house would be totally unaffected by the Project, as would views in these directions from the garden. Overall, it is observed that the Project would be a partially discernible element from only a small proportion of all available views from the property. It is also			view, and would not be clearly discernible from more than one aspect of the dwelling.

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
					noted, that given the: distance from the property to those pylons and overhead lines that are visible; the visually filtering nature of mature intervening vegetation in many such views; and the presence of other vegetation beyond that would provide a backcloth it, the Project in such instances, would not become a defining feature in residents' visual experience. Consequently, when seen in the round, the Project is considered to have a moderately low impact on residential visual amenity at No. 70, Flordon Road.			
A27	618085, 298246	260 m (RG22)	S	71, Flordon Road A two-storey semi-detached property with ground floor and upper storey windows on all elevations, apart from upon its party wall with no. 70, Flordon Road to the north. The dwelling's main aspect faces west,	Whilst the closest pylon to the property is RG22 (located 260 m from its curtilage), views to it would be largely constrained by the fact that the dwelling of High Hopes lies in between and is relatively close to the dwelling. Views eastwards to pylons RG20 (685 m away) and RG21 (391 m away), and the overhead lines either side of them, would be	**Low-Medium**	**No**	**No.** In the case of No 71, Flordon Road, the resultant distances between the pylons should they be moved 30 m perpendicularly towards the

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				looking out from presumed living space and the front door onto a garden area. An additional garden exists to the immediate south of the dwelling. This is only accessed / viewed, however, by a partially glazed back door and two moderately sized windows. The majority of this façade remains bricked. A single storey wing extends eastwards from the dwelling but contains few windows. The south-facing garden is bounded by some mature trees, solid panel fencing and by some small outbuildings. The west facing garden is visually bounded by a low hedge and the occasional presence of cars in the	possible from the upper windows of the dwelling's eastern façade, but would be constrained by mature trees and hedgerows that form the intervening field boundaries. An oblique view to RG21 would also be possible from the single upper floor window on the south façade, but this too would be filtered by the same vegetation. Views from the southern garden area to RG20 and RG21 (and the overhead lines either side of them) would also be possible, but they too would be restricted by this vegetation, as well as by the planting, fencing and outbuildings within and immediately around the garden. When such glimpsed views to RG20 and RG21 are possible from the curtilage of the dwelling, they would only form a minor part of the visual scene given the distance they are away. Likewise, whilst the uppermost sections of other proposed pylons, further to the north east, would also be visible			side of the LoD closest to the dwelling's curtilage (e.g. RG20: 679 m away, RG21; 380 m away and RG22: 229 m away), and the fact that intervening vegetation and structures would still be present between the property and these, means that a high magnitude of change would not occur. The pylons, and the overhead lines either side of them, would still to be far

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				adjacent driveway. Beyond these garden areas to the near immediate south is the two storey dwelling of High Hopes (and its own fencing, outbuildings and vegetation). To the west, on the opposite side of Flordon Road, is a tall mature hedgerow, which significantly restricts views in this direction (particularly in summer months). These aspects and elements combine to restrict views from 71, Flordon Road to predominantly only short views with occasional longer distance ones from upper floor windows. These longer distance views to the south, east and south-east over the relatively flat, large-scale	over the top of surrounding woodlands and tree belts, these too would form very minor parts of occupiers' visual experience. The proximity of these mature woodlands, tree belts and the lone field boundary / hedgerow trees in views from the property would also provide a notable visual backcloth to all visible pylons and conductors. This would further diminish their impact on residents' visual amenity. Views to the west of the property would be totally unaffected by the Project. Overall, it is observed that the Project would be a partially discernible element from only a moderate proportion of all available views from the property. It is also noted, that given the: distance from the property to those pylons that are visible; the visually screening nature of adjacent buildings and fencing, and filtering nature of mature intervening vegetation in			enough away not to bring about a large change to views in the round, would not become a defining element in any view, and would not be clearly discernible from the primary outlook of the dwelling.

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				surrounding fields are often curtailed and interrupted by nearby woodlands (e.g. Upper Grove Wood, and the woodland to the north of Flordon Hall), tree belts, lone field boundary trees, and hedgerows, as well as the structure of 'High Hopes'.	many such views; and the presence of other vegetation beyond that would provide a backcloth it, the Project in such instances, would not become a defining feature in residents' visual experience. Consequently, when seen in the round, the Project is considered to have a moderately low impact on residential visual amenity of 71, Flordon Road.			
A28	618096, 298215	223 m (RG22)	S	<u>High Hopes, Flordon Road</u> A two-storey detached property with ground floor and upper storey windows on all elevations. The dwelling's main aspects face south (looking out from upper and lower bay windows on this façade) and west (across its relatively large driveway to its frontage with Flordon Road). In addition	The closest pylon to the property is RG22 (located 223 m from its curtilage). Clear views to it, and to the overhead lines either side of it, would be possible from: the windows on the southern aspect of the house only; from the driveway; and from the southern and eastern garden areas. Views eastwards to pylon RG21 (380 m away), and the overhead lines either side of it, would be possible from: the windows on the eastern aspect of the house only; from parts of the	**High**	**Yes**	**No.** In the case of High Hopes, the resultant distances between the pylons to the dwelling's curtilage should they be moved 30 m perpendicularly towards the side of the LoD closest to the

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				to the driveway, garden areas exist to the immediate south, east and north of the dwelling. The garden is bounded from the immediately surrounding fields by medium height solid panel fencing, some small outbuildings and some maturing trees and shrubs. Beyond the garden to the north, and a public right of way / farm track, is the garden and the dwelling of 71, Flordon Road. A tall mature hedgerow (approximately 22m away from the dwelling of High Hopes) bounds the opposite side of Flordon Road past the property and restricts views westwards (particularly in summer months).	driveway; and from the southern, eastern and northern garden areas. The mature trees in the belt close to the east side of the property would largely restrict most views of pylon RG20 (680 m away). Given the distance pylons RG20 and RG21 are from the curtilage of the dwelling, they would only form a very minor and moderate-minor part of the overall visual scene, respectively. Likewise, whilst the uppermost sections of other proposed pylons, further to the north east, would be also visible over the top of surrounding woodlands and tree belts these too would form very minor parts of occupiers' visual experience. The proximity of these mature woodlands, tree belts and the lone field boundary / hedgerow trees in available views from the property would also provide a notable visual backcloth to all visible pylons and conductors, which would diminish			dwelling would still mean that RG22 (195 m away) would be a clearly discernible and prominent element in views, but not be overwhelming or dominating. RG21 (368 m away) and RG 20 (671 m away) would remain less visible and visually filtered, in part, by existing mature vegetation.

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
				Medium distance views over the relatively flat, large-scale fields to the south, east and north-east of High Hopes (with occasional longer views southwards) are experienced from the dwelling and garden. These are, however, curtailed and interrupted by nearby woodlands (e.g. Upper Grove Wood, and the woodland to the north of Flordon Hall), tree belts, lone field boundary trees, and hedgerows.	their impact on residents' visual amenity. Views from the north and west windows of the property would be totally unaffected by the Project, as would views in these direction from the garden. Overall, it is considered that some elements of the Project (i.e. pylon RG22 and the conductors either side of it) would be a clearly discernible and prominent elements from the windows on the south side of the property and from the garden and driveway areas to its south, west and east. Other parts (i.e. pylons RG21 and RG20) would be less visible and visually filtered, in part, by existing mature vegetation. Given these distances the pylons are from the dwelling, their presence would not be overwhelming or dominating. In addition, there would be views from the property that would remain totally unaffected by the Project.			

Ref.	OS Grid Ref.	Approx. m to nearest pylon	Direction to nearest pylon	Description of Property, Existing View and Visual Amenity (Step 2)	Description of Likely Change to Views and Visual Amenity as a Result of the Project (assessed against proposals shown in Figure 4.2 - Proposed Project Design - Permanent Features)	Magnitude of effect	Step 4 Triggered	Could the LoD affect whether a Step 4 assessment is triggered?2
	For groups, closest property's OS ref, distance and direction recorded							
					Consequently, when seen in the round, the Project is considered to have a high impact on residential visual amenity at High Hopes.			

3.3 Residential Properties Triggering the RVAT (Step 4)

3.3.1 The ‘Step 4’ assessment in Table 3.2 Assessment of likely change to visual amenity – High Hopes (A28) has been carried out using the same methodology as used in **RVAA [REP4-148]**.

Table 3.2 Assessment of likely change to visual amenity – High Hopes (A28)

Assessment of Likely Change to Visual Amenity (Step 4)
Property Ref: A28
Property Name: High Hopes
Predicted Effects on Visual Amenity
Residents of High Hopes would experience views of the Project in two directions only. Firstly, clear and discernible views southwards to pylon RG22 (223 m away, or 195 m away should it be moved within the Limits of Deviation) and the overhead lines either side of it. These would be visible from the ground and first-floor windows on its southern aspect only (one of its main aspects), as well as from the driveway and from the southern and eastern garden areas. Secondly, eastwards to pylon RG21 (380 m away, or 368 m away should it be moved within the Limits of Deviation) and the overhead lines either side of it. These would be visible from the windows on the eastern aspect of the house only, as well as from parts of the driveway and from the southern, eastern and northern garden areas. Consequently, whilst awareness of the Project would be likely in most rooms that face south and east, those that face north and west would not experience views of it. Likewise, views from the effected garden areas to the south and east would be impacted, but those to the north, north east and west would entirely not. For example, the main terrace within the garden is located to the dwelling's north east, and that views from it northwards and north eastwards would remain unaffected. The Project would not, therefore be visually inescapable nor overwhelming in all directions from the property. Further to this, the Project elements would appear as visually permeable and motionless structures from the property. They would still allow views through them to the farmsteads, arable fields, and the notable number of woodlands, tree belts and hedgerows that characterise this landscape. These vegetated visible aspects of the existing surrounding landscape, as well as the landform visible in the longer distance, would, moreover, provide a backcloth to the pylons and overhead lines, so diminishing their impact on residents' visual amenity. The views from the dwelling, when considered in the round, therefore, would remain fundamentally rural in nature, and remain characterised predominantly by agriculture, woodland, tree belts and scattered settlement. The Project, where visible, on account of these factors and its moderate distances to the dwelling, is not considered to be oppressive, overbearing, nor so dominant as to fundamentally affect the use of the property. Cumulative development SN44 (installation of a BESS including associated infrastructure and landscaping) would be located approximately 500m to the north-west of this property. Views to this would be severely prevented by the: existing tall mature hedgerow to the west of Flordon Road past High Hopes; the tree groups along Wymondham Road; and the proposed planting around the cumulative development. Consequently, no significant cumulative effects are anticipated.
Conclusion

Assessment of Likely Change to Visual Amenity (Step 4)			
Changes at this property would be of a high magnitude but would not be sufficient to breach the Residential Visual Amenity Threshold.			
RVAT Breached?	No	Would the latitudinal, longitudinal or vertical LoD affect the RVAT result, assuming a worst-case scenario?	No

3.4 Conclusion

3.4.1 This response to the Rule 17 question no. 2 (dated 5 June 2026) sets out why residential properties '70' and '71', and 'High Hopes', Flordon Road, were not included in the submitted **RVAA [REP4-148],** based upon the distances recommended within industry guidance document i.e. they are located outside the 200 m Study Area.

3.4.2 The response also provides an exceptional additional assessment into the likely change to the visual amenity of these dwellings as a result of the Project – as requested by the ExA.

3.4.3 The assessment identified that only one of the three properties – 'High Hopes', would be expected to experience a **high** magnitude of change to its visual amenity. Even when considering the worst-case scenario of the Project maximising its use of the Limits of Deviation. Nos. '70' and '71', Flordon Road were found to experience a **low-medium** magnitude of effect.

3.4.4 When the likely effect on the visual amenity of High Hopes was considered further in a Stage 4 assessment, the Project was found not to breach the 'Residential Visual Amenity Threshold'.

3.4.5 This exceptional additional assessment, at the request of the ExA, affirms paragraph 3.2.4 of the **RVAA [REP4-148]**, which states that while there is the potential for the Project to bring about significant visual effects beyond the 200 m RVAA Study Area, these '*are not considered likely to affect 'living conditions'* of any residential property, inside or outside or inside of the Study Area. It also maintains the conclusion of paragraph 13.6.3 of the RVAA **[REP4-148]** which states that '*no instances have been found where effects on Residential Visual Amenity would be so great that they would affect living conditions and render those properties 'unattractive places to live"*.

4. Biodiversity Net Gain Guidance

4.1 ExA Request

4.1.1 *'The Applicant is asked to comment on the following documents published on 2 June 2026 and to set out how they relate to its biodiversity net gain (BNG) proposals.*

- *Biodiversity net gain: nationally significant infrastructure projects*
- *Biodiversity net gain statements for nationally significant infrastructure projects.*

4.1.2 *The ExA asks the Applicant to set out how its proposals compare and whether, if the application had been submitted after 2 November 2026, it would comply with the guidance and whether anything in the Biodiversity Net Gain Report **[APP-299]** would need amending or adding to in order to be in compliance with the recently published guidance on BNG.'*

4.2 The Applicant's Response

4.2.1 Biodiversity Net Gain (BNG) will become a statutory requirement for Nationally Significant Infrastructure Projects (NSIPs) submitted on or after 2 November 2026. Prior to this date, there is no legal obligation to deliver BNG for NSIPs. Norwich to Tilbury (the 'Project') was submitted in August 2025 and therefore BNG is not a mandatory requirement and the BNG for NSIP Guidelines published in June 2026, and referenced by the ExA, are therefore not applicable to the Project.

4.2.2 However, National Grid anticipated that BNG requirements for NSIPs would become mandatory in the future, recognising the emerging policy framework. In response, it developed its RIIO-2 T3 Business Plan (2026–2031), setting out firm targets for this five-year period (National Grid, 2024[3]). National Grid has committed that by 2031 it will '*deliver BNG alongside wider environmental and societal benefits*', measured through the achievement of '*at least 10% BNG, alongside wider environmental and societal benefits, for all developments requiring formal planning consent'*. This included a commitment of 10 % BNG with wider environmental and societal benefits for the Project, as set out within the application documents.

4.2.3 In the absence of any NSIP BNG guidelines, a bespoke BNG methodology was developed by the Applicant during the pre-application stage (2023-2024). This approach was in the spirit of the existing BNG guidelines for Town and Country Planning applications, with some amendments to the methodology to fit the large scale, linear and broadly temporary nature of the Project. The BNG methodology applied by the Applicant is set out in detail within **7.1 Biodiversity Net Gain Report [APP-299].** Natural England was also consulted in 2024 and had no objection to the BNG approach proposed and has been proactively engaged with the Project since.

4.2.4 As referenced by the ExA, in early June 2026, over half-way through the Project's examination phase, the following BNG NSIP guidance was published.

[3] https://www.riiot3.nationalgrid.com/document/30069/download. Accessed July 2025 National Grid (2024b) RIIO-T3 Environmental Action Plan. National Grid; London

- The Nationally significant infrastructure projects: Biodiversity Gain Statement for Energy (June 2026) - sets out the BNG requirements for how energy NSIPs must calculate, deliver and report on BNG (Defra June 2026). From 2 November 2026 this biodiversity gain statement will have the same effect as if it were included in the Overarching National Policy Statement for Energy (EN-1)
- Biodiversity net gain: nationally significant infrastructure projects (Defra June 2026) - sets the rules for how all NSIP developers must calculate, deliver, secure, and report at least 10% biodiversity net gain when applying for a Development Consent Order (DCO) on or after 2 November 2026.

4.2.5 The Applicant has reviewed the guidance as requested by the ExA and considers that the Project's BNG assessment approach largely complies with the Defra NSIP guidance released in June 2026.

4.2.6 Key principles that comply with the Town and Country Planning guidance such as 10% BNG target, the mitigation hierarchy, use of statutory metric, habitat trading rules, offsite delivery and a 30-year management for newly created habitats, are already embedded within the BNG strategy for the Project. In addition, the Project has incorporated many of the principles set out in the guidance specifically designed for NSIPs. This includes use of a 'BNG boundary' rather than the Order Limits (referred to as the 'maximum construction boundary') and inclusion of like-for-like replacement planting for area habitats within the metric, without the need for a 30-years management commitment. The Project has exceeded the requirements in the new guidelines, with the inclusion of a 5-year habitat management and maintenance period for reinstated habitats. The Project has also exceeded the requirements set out in the new guidance regarding temporary works, treating only those works completed within two years as retained, rather than applying the newly proposed five-year threshold.

4.2.7 The new guidance outlines the information that must be submitted with any future application. The Applicant can confirm that the required evidence has been provided, although some elements may be packaged or titled differently from the format explicitly described in the new guidance.

4.2.8 While there are some differences between the Project's BNG approach and the newly released BNG guidelines, these differences on balance would not significantly change the overall BNG assessment. An example of a difference is the suggested wording for a BNG requirement within the DCO. The Applicant considers that the additional approval mechanism of a specific BNG requirement, is not necessary for the Project because the existing and proposed controls are appropriate and proportionate.

- Onsite BNG is already secured under Requirement 4 of 3.1 Draft DCO **[REP5-060],** through the Final LEMP(s), which requires approval by Local Planning Authorities. These plans include all relevant habitat, management and monitoring details. The Statutory Biodiversity Metric and methodology will not change from that assessed in **7.1 Biodiversity Net Gain Report [APP-299],** which has been examined.
- The commitment to deliver offsite biodiversity units (onsite BNG deficit) will be legally secured via a unilateral section 106 agreement. The Applicant will acquire the necessary biodiversity units by purchasing the units from third-party providers. An agreement will exist between the biodiversity unit providers and planning authorities, or Conservation Covenants with Responsible Bodies as part of the

registration process. This agreement outlines the legal obligations and responsibilities of the landowner in creating and maintaining biodiversity improvements. These mechanisms already provide enforcement and long-term security.

- The Applicant considers that section 106 provides an equally secure and appropriate route as a similarly worded requirement would do to control the delivery of BNG. This section 106 mechanism to secure offsite BNG has been successfully used by Yorkshire Green, another recent National Grid NSIP project.

4.2.9 The Project spans 13 Local Planning Authorities; requiring formal approval of off-site BNG measures from all authorities will introduce complexity and potential delay. Instead, the Applicant will ensure transparency through reporting and clear site selection criteria.

4.2.10 BNG is a voluntary commitment for the Project, but the Applicant has nonetheless committed to delivering at least 10 % BNG. The approach taken is therefore proportionate to its voluntary status.

4.2.11 The Applicant will secure its commitment to 10 % BNG through a Section 106 unilateral undertaking with the 13 Local Planning Authorities. This approach is considered appropriate because:

- It provides enforceable obligations equivalent to a bilateral agreement
- It avoids the need for multiple authorities to be parties to a single agreement
- Local Planning Authorities retain full enforcement powers.

4.2.12 The delivery mechanisms for securing the 10 % BNG both on and off-site are also considered to be appropriate, as set out in the application documents in the absence of any mandatory legal framework for NSIPs.

4.2.13 In summary, delivery of BNG is not a mandatory requirement for the Project and therefore the BNG for NSIP Guidelines are not applicable to the Project. However, the Applicant considers the Project's BNG approach to largely comply with the Defra NSIP guidance released in June 2026.

Abbreviations

Abbreviation	Full Reference
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
DCO	Development Consent Order
Defra	Department for Environment, Food and Rural Affairs
ExA	Examining Authority
ISH	Issue Specific Hearing
LEMP	Landscape and Ecological Management Plan
LI TGN	Landscape Institute's 'Technical Guidance Note
RVAA	Residential Visual Amenity Assessment
RVAT	Residential Visual Amenity Threshold
NSIP	Nationally Significant Infrastructure Project
OS	Ordnance Survey

Glossary

Term	Description
Biodiversity	The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part: this includes diversity within species, between species and of ecosystems.
Biodiversity Net Gain	An approach for developments to ensure habitats for wildlife are left in a measurably better state than they were before the development.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Limits of Deviation	LoD allow for adjustment to the final positioning of the permanent infrastructure, for example, to avoid localised constraints or unknown or unforeseeable issues that may arise. This could include previously unidentified poor ground conditions requiring a pylon to be moved slightly for geotechnical reasons, such as ground stability. The horizontal LoD define the parameters within which the position on the ground of proposed permanent infrastructure may deviate from the position shown on the plans. This applies to both linear (for example overhead line and underground cables) and non-linear (for example the EACN Substation and CSE compounds) proposed infrastructure. Vertical LoD limit the maximum vertical height, or the depth below ground, of any new infrastructure
Nationally Significant Infrastructure Project	Typically, a large-scale development of national importance that requires development consent from the Secretary of State, under the Planning Act 2008.
Visual amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area. [taken from GLVIA3]

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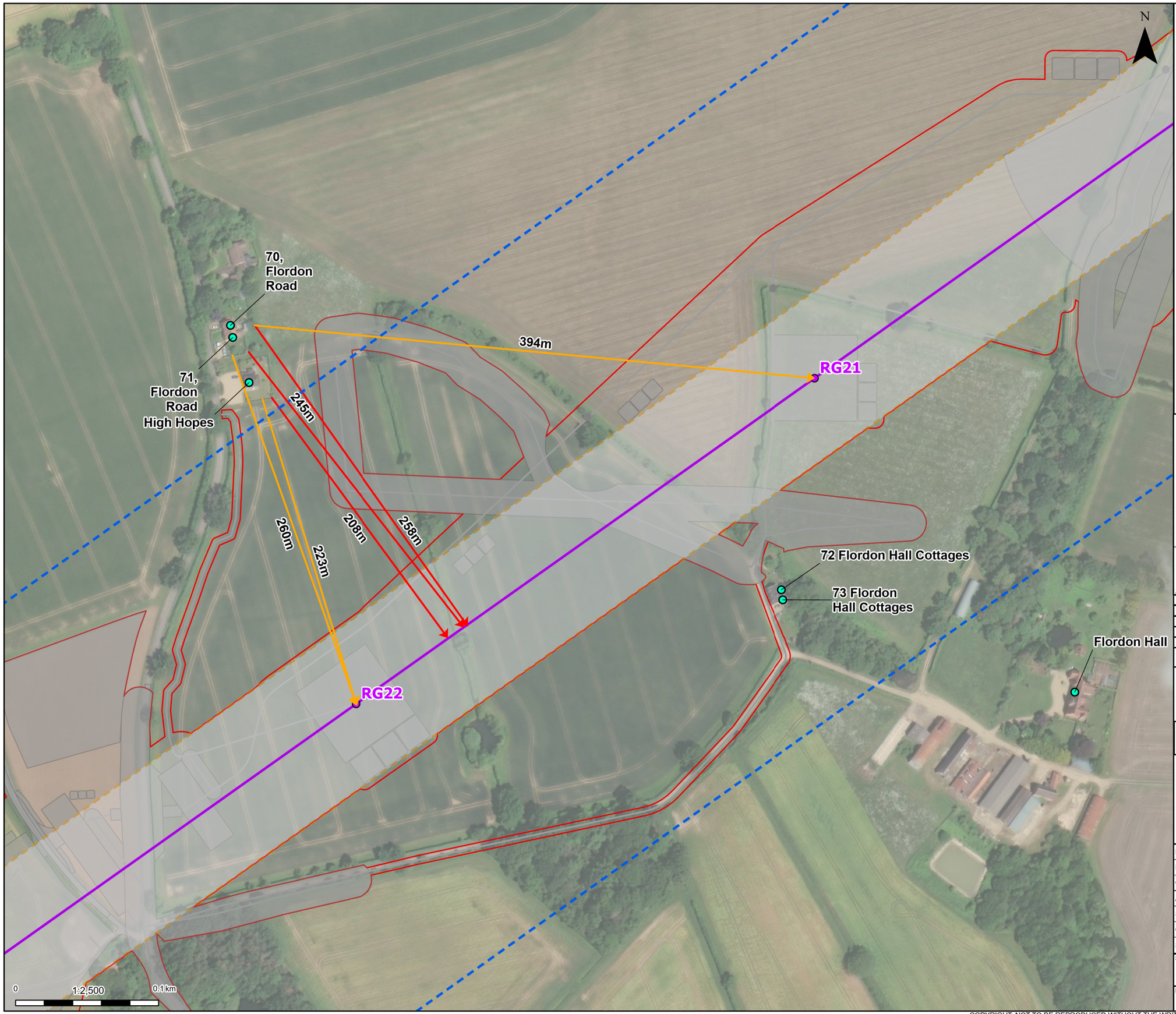
Available at: https://www.riiot3.nationalgrid.com/document/30069/download. Accessed July

2025 National Grid (2024b) RIIO-T3 Environmental Action Plan. National Grid; London

Appendix A. Figure 8.26 Response to Rule 17 Letter received 5 June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road

nationalgrid

Appendix A Figure 8.26 Response to Rule 17 Letter received 5 June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road



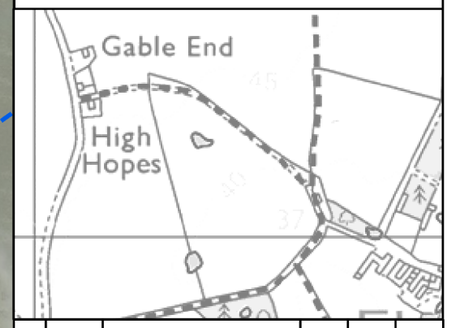
Order limits

Proposed project design details

- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Overhead line limits of deviation
- Other temporary and permanent construction and operational works

Discipline specific constraints

- Residential dwellings
- Distance from closest point within the property's curtilage to the Project
- Distance from property's curtilage to pylon
- Study Area



Rev	Date	Description	Drawn	Check	Approv
A	June 2026	DEADLINE 5A	KF	AF	KB

nationalgrid

PROJECT:
Norwich to Tilbury

Planning Inspectorate App Number: EN020027

Title:
8.26 Response to Rule 17 Letter received 5th June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road

Designed	B. Hilder	Date	June 26
Drawn	K. Fischer	Date	June 26
Checked	A. Fell	Date	June 26
Approved	K. Burrows	Date	June 26
Scale:	1:2,500	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
Accepted as Concept Stage

Drawing Number: 10059280-ARC-EGN-ZZ-DR-ZZ-00937

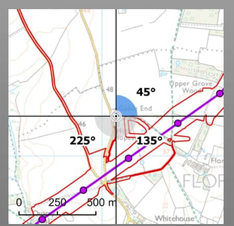
Revision: A

Print Date: 06-15-26 13:35:20

Appendix B. Figure A13.4.2Aa (xxvi) to Figure A13.4.2Aa (xxviii)

nationalgrid

Appendix B Figure A13.4.2Aa (xxvi) to Figure A13.4.2Aa (xxviii)



Wireline

View flat at a comfortable arm's length

nationalgrid

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Direction of view:	45°	Paper size:	841 x 297 mm (half A1)
Nearest pylon:	277m	Correct printed image size:	820 x 260 mm

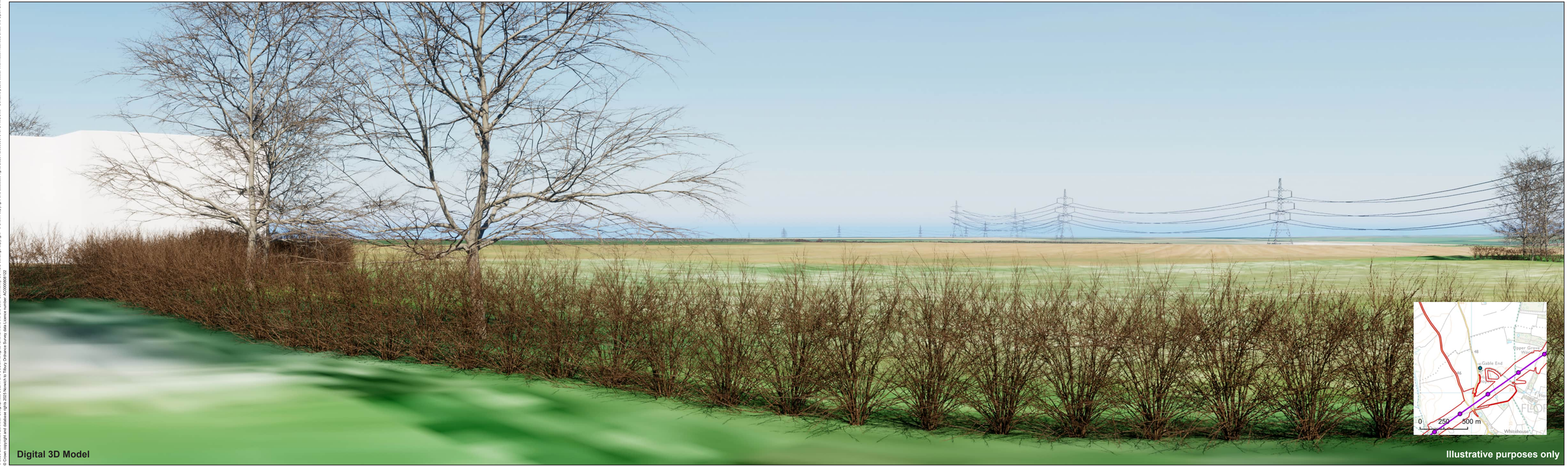
Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

Figure: A13.4.2Aa (xxvi)

Viewpoint VP178: A26 - '70', Flordon Road



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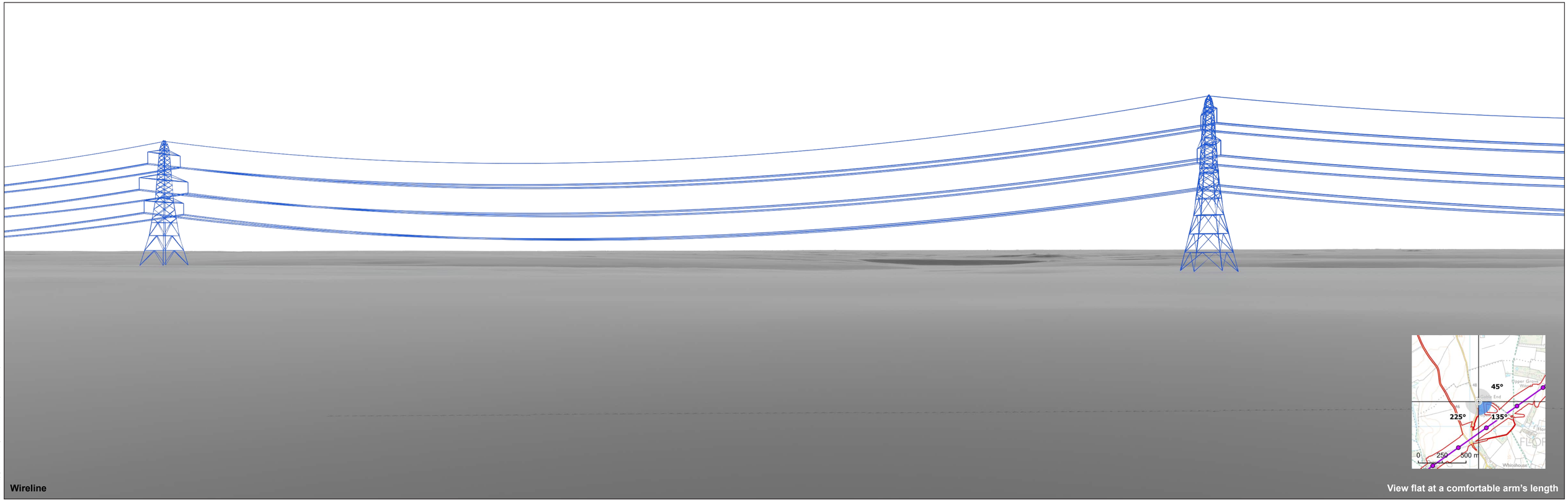
		Paper size:	841 x 297 mm (half A1)
		Correct printed image size:	820 x 260 mm

Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
2) Hedgerows are modelled from selected properties up to 200m to an assumed height of 1.5m.
3) Buildings are modelled from selected properties up to 1km based on the OSMM NGD building dataset.

Notes:
1) These indicative visualisations present digital tree models and building masses
2) The location of the illustrative visualisations differs from wireline visualisations to avoid obstructions within the view.

Norwich to Tilbury

Figure: A13.4.2Aa (xxvi)_b
Viewpoint VP178: A26 - '70', Flordon Road



Wireline

View flat at a comfortable arm's length

nationalgrid

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Nearest pylon:	277m	Correct printed image size:	820 x 260 mm

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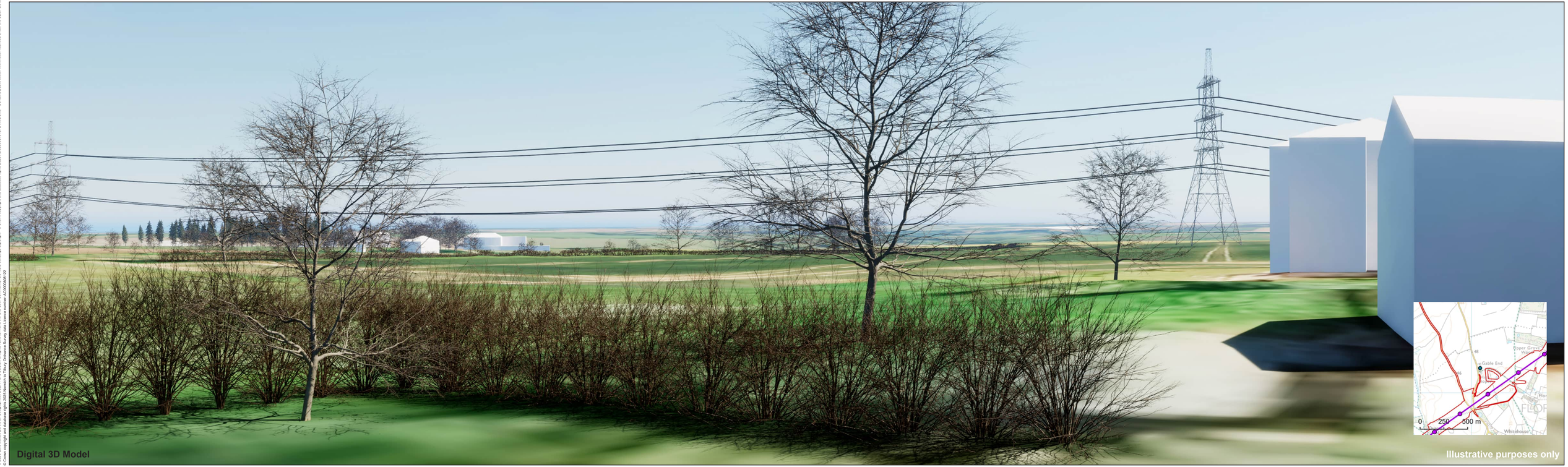
Norwich to Tilbury

Figure: A13.4.2Aa (xxvi)
Viewpoint VP178: A26 - '70', Flordon Road



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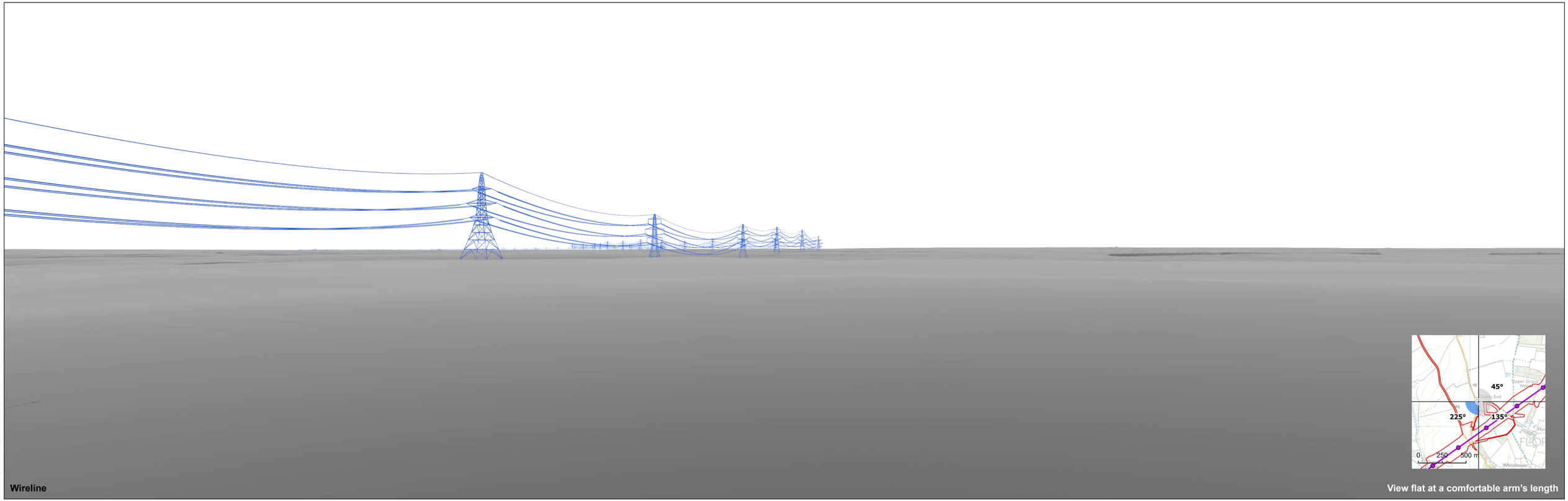
Norwich to Tilbury

Figure: A13.4.2Aa (xxvi)_b
Viewpoint VP178: A26 - '70', Flordon Road



Wireline

View flat at a comfortable arm's length

nationalgrid

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Direction of view:	225°	Paper size:	841 x 297 mm (half A1)
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Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

Figure: A13.4.2Aa (xxvi)

Viewpoint VP178: A26 - '70', Flordon Road

nationalgrid

OS reference: 618091E 298260N
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Horizontal field of view: 90° (cylindrical projection)
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Correct printed image size: 820 x 260 mm

Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
2) Hedgerows are modelled from selected properties up to 200m to an assumed height of 1.5m.
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Norwich to Tilbury

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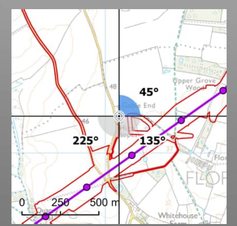

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Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

Figure: A13.4.2Aa (xxvii)

Viewpoint VP178: A27 - '71', Flordon Road

nationalgrid

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Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
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Notes:
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Norwich to Tilbury

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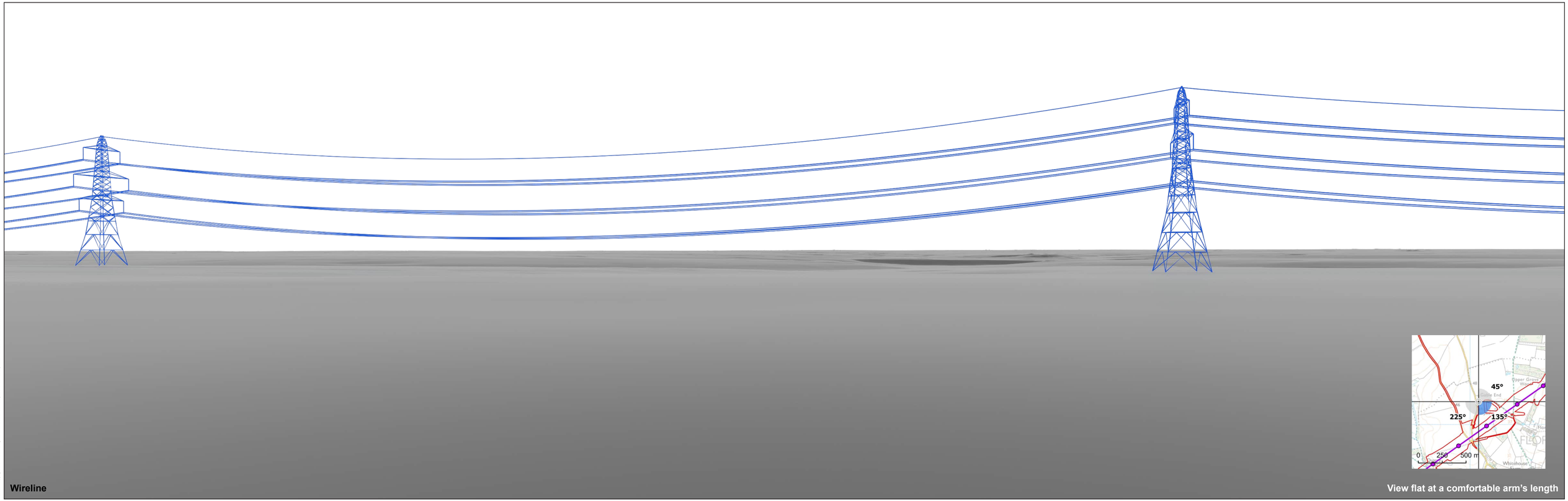

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Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

Figure: A13.4.2Aa (xxvii)

Viewpoint VP178: A27 - '71', Flordon Road

nationalgrid

OS reference: 618089E 298241N
AOD: 47.3 m

Horizontal field of view: 90° (cylindrical projection)
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Paper size: 841 x 297 mm (half A1)
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Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
2) Hedgerows are modelled from selected properties up to 200m to an assumed height of 1.5m.
3) Buildings are modelled from selected properties up to 1km based on the OSMM NGD building dataset.

Notes:
1) These indicative visualisations present digital tree models and building masses
2) The location of the illustrative visualisations differs from wireline visualisations to avoid obstructions within the view.

Norwich to Tilbury

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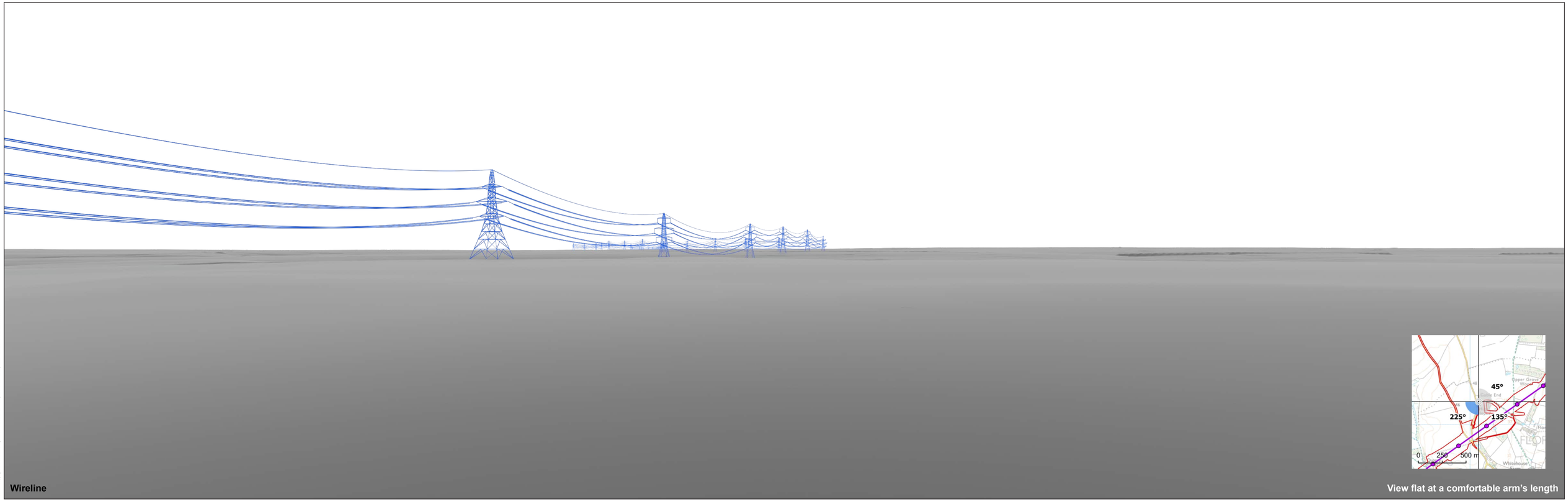
Viewpoint VP178: A27 - '71', Flordon Road



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Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

Figure: A13.4.2Aa (xxvii)

Viewpoint VP178: A27 - '71', Flordon Road

nationalgrid

OS reference:	618089E 298241N	Horizontal field of view:	90° (cylindrical projection)
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Norwich to Tilbury

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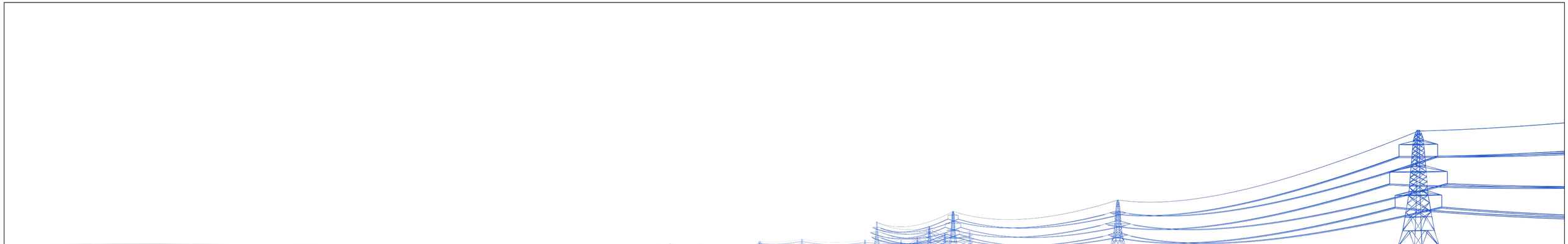

Wireline

View flat at a comfortable arm's length

nationalgrid

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AOD:	46.1 m	Principal distance:	522 mm
Direction of view:	50°	Paper size:	841 x 297 mm (half A1)
Nearest pylon:	223m	Correct printed image size:	820 x 260 mm

Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

A13.4.2Aa (xxviii)

Viewpoint VP178: A28 – 'High Hopes', Flordon Road

nationalgrid

OS reference:	618107E 298208N	Horizontal field of view:	90° (cylindrical projection)
AOD:	46.1 m	Principal distance:	522 mm
		Paper size:	841 x 297 mm (half A1)
		Correct printed image size:	820 x 260 mm

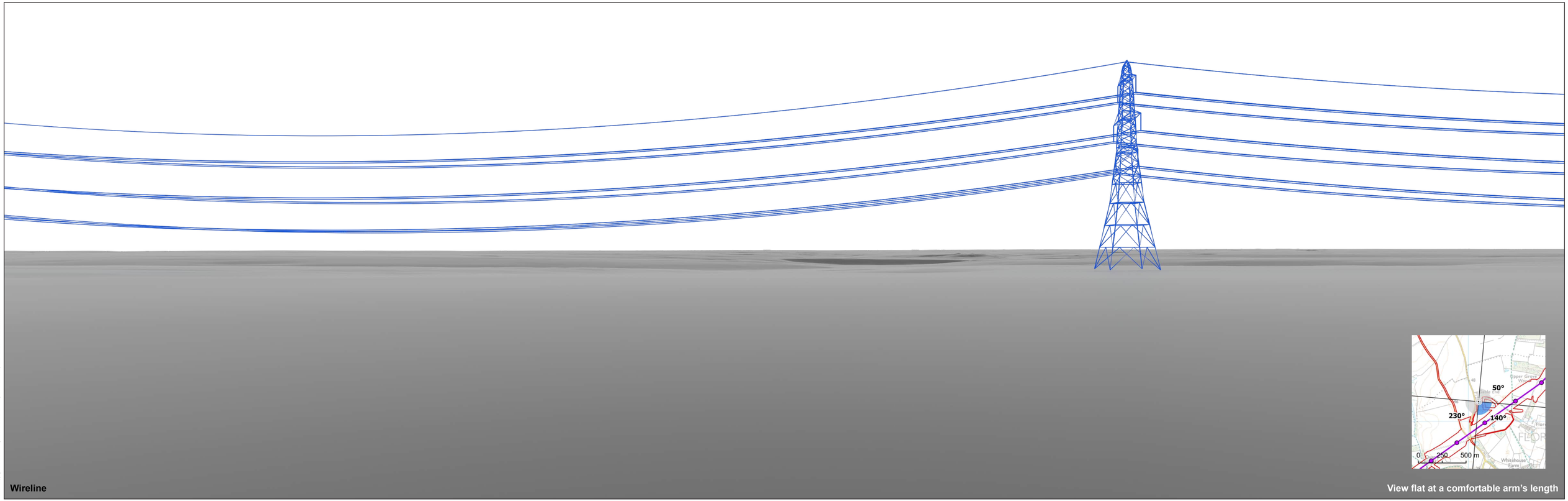
Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
2) Hedgerows are modelled from selected properties up to 200m to an assumed height of 1.5m.
3) Buildings are modelled from selected properties up to 1km based on the OSMM NGD building dataset.

Notes:
1) These indicative visualisations present digital tree models and building masses
2) The location of the illustrative visualisations differs from wireline visualisations to avoid obstructions within the view.

Norwich to Tilbury

A13.4.2Aa (xxviii)_b

Viewpoint VP178: A28 – 'High Hopes', Flordon Road



Wireline

View flat at a comfortable arm's length

nationalgrid

OS reference:	618107E 298208N	Horizontal field of view:	90° (cylindrical projection)
AOD:	46.1 m	Principal distance:	522 mm
Direction of view:	140°	Paper size:	841 x 297 mm (half A1)
Nearest pylon:	223m	Correct printed image size:	820 x 260 mm

Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

A13.4.2Aa (xxviii)

Viewpoint VP178: A28 – 'High Hopes', Flordon Road

nationalgrid

OS reference:	618107E 298208N	Horizontal field of view:	90° (cylindrical projection)
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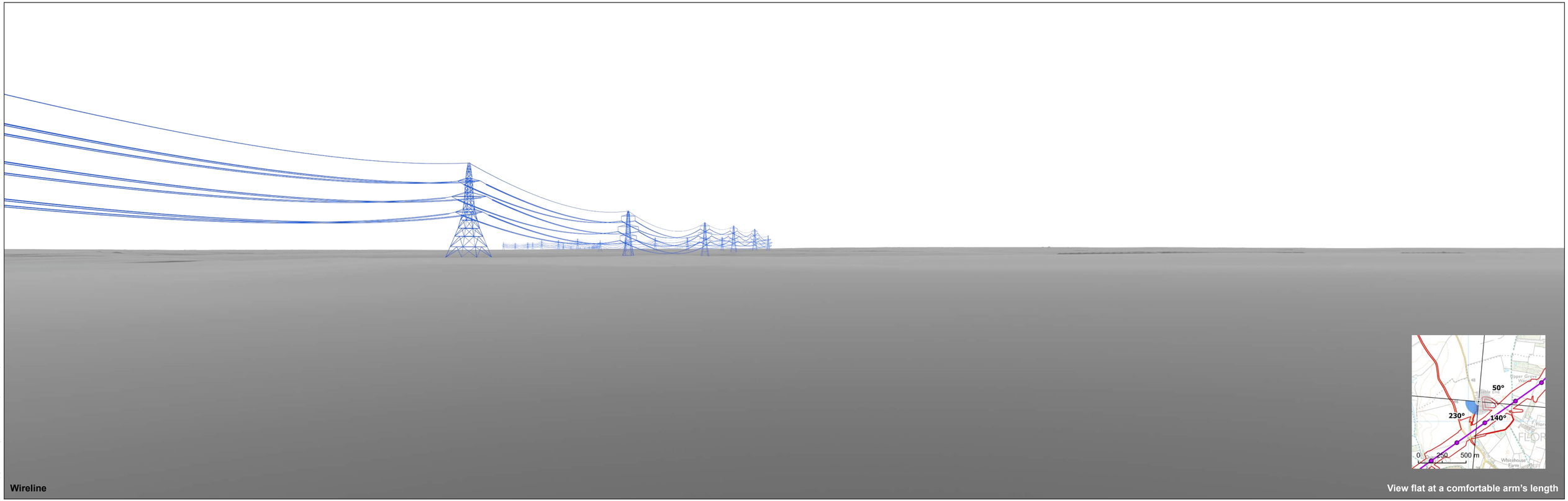
Norwich to Tilbury

A13.4.2Aa (xxviii)_b
Viewpoint VP178: A28 – 'High Hopes', Flordon Road



Wireline

View flat at a comfortable arm's length

nationalgrid

OS reference:	618107E 298208N	Horizontal field of view:	90° (cylindrical projection)
AOD:	46.1 m	Principal distance:	522 mm
Direction of view:	230°	Paper size:	841 x 297 mm (half A1)
Nearest pylon:	223m	Correct printed image size:	820 x 260 mm

Notes:

1) These indicative wirelines represent a 'maximum visibility scenario.'

Norwich to Tilbury

A13.4.2Aa (xxviii)

Viewpoint VP178: A28 – 'High Hopes', Flordon Road

nationalgrid

OS reference:	618107E 298208N	Horizontal field of view:	90° (cylindrical projection)
AOD:	46.1 m	Principal distance:	522 mm
		Paper size:	841 x 297 mm (half A1)
		Correct printed image size:	820 x 260 mm

Modelling Assumptions:
1) Trees are modelled from selected properties up to 200m based on National Tree Map data.
2) Hedgerows are modelled from selected properties up to 200m to an assumed height of 1.5m.
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Norwich to Tilbury

A13.4.2Aa (xxviii)_b
Viewpoint VP178: A28 – 'High Hopes', Flordon Road

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