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Volume 8: Examination Documents

Document: 8.4.14 Applicant's Comments on any Further Information
or Submissions Received by Deadline 5

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1. Introduction

1.1 Purpose of This Document

- 1.1.1 A number of submissions by Interested Parties (IPs) and Affected Parties (APs) were accepted into the Examination at Deadline 5. The Applicant has reviewed these documents and provided a response where content is directed to the Applicant and the Applicant considers it would be useful for the purposes of the Examination to address a new point, provide a correction, or signpost to information provided elsewhere in the Applicant's documents that provides a response. In some cases, this is a cross reference to a response previously provided by the Applicant where this addresses the point made. The responses are presented in alphabetical order and their Examination library reference number is provided.
- 1.1.2 The Applicant has in some cases sought to summarise the content of the submissions where they are particularly lengthy and/or raise matters that have been previously raised in the Examination and responded to by the Applicant. In doing so, the Applicant has sought to aid the Examining Authority (ExA) and IPs/APs in providing a succinct and proportionate written response.
- 1.1.3 A small number of submissions were of particular length or detail, including the submission of detailed technical reports. In order to aid legibility of the main document, the Applicant has appended its response to these submissions.
- Appendix A – Applicant's Comments on Appendix B of Ardeleigh Parish Council and Little Bromley Parish Council Deadline 5 submission **[REP5-227]** – Combined Cumulative Impact Ardeleigh & Little Bromley (ALBA)
 - Appendix B– Applicant's Comments on Essex County Council Appendix 3 **[REP5-243]**
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 - Appendix D1– Applicant's responses to the Deadline 5 submission from Pylons East Anglia (PEA) **[REP5-264]** and **[REP5-265]**.
 - Appendix D2– Applicant's Comments to Pylons East Anglia Appendix D - Landscape Partnership Report **[REP5-277]**
 - Appendix D3– Applicant's Response to Pylons East Anglia Charles Banner KC opinion
 - Appendix E– Applicant's Responses to Table 9 of Suffolk County Council Deadline 5 Submission **[REP5-270]**.
 - Appendix F- Additional Detailed Design Request(s)
- 1.1.4 Finally, the Applicant highlights that some submissions made at Deadline 4 were IP/AP responses to the second written questions (ExQ2) and the Applicant has provided its comments on these separately in **8.4.15 Applicant's Comments on**

Responses to ExQ2 [Revision A]. Where a single submission provided both responses to ExQ2 and a general submission, it may be represented in both documents prepared by the Applicant.

1.2 Comments Relating to Site Visits

- 1.2.1 A number of submissions made at Deadline 5 were comments on the accompanied site visit and/or unaccompanied site visits carried out by the ExA. These are:
- REP5-228 ARU Writtle
 - REP5-286 Christine Hall
 - REP5-289 Clare Lanham, Dick Lanham and Paul Lanham
 - REP5-238 Cotton Parish Council
 - REP5-294 James Abbott
 - REP5-297 Jeremy Taylor
 - REP5-299 Joanne Lesley Elliott
 - REP5-304 Mark Passmore
 - REP5-258 Norfolk Gliding Club
 - REP5-306 Paul Lanham
 - REP5-308 Penny Lansdown
 - REP5-278 Villages against Pylons.
- 1.2.2 The Applicant has not responded to these submissions, as the carrying out of site visits is primarily a matter for the ExA and Planning Inspectorate Case Team. The Applicant will however engage with any requests or requirements from the ExA relating to site visits, as necessary.
- 1.2.3 Submissions that raise other material points directed at the Applicant, in addition to comments on site visits, are responded to by the Applicant where appropriate in this document, however the site visit comments are not included.

2. Comments on Any Further Information or Submissions Received by Deadline 5

2.1.1 Table 2.1 provides the Applicant’s responses to Interested Party and Affected Party Deadline 5 submissions as titled in the Examination library ‘Comments on any further information or submissions received by deadline 4’. Submissions relating to the second written questions (ExQ2) are responded to in **8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A]**.

Table 2.1 Applicant’s responses to Deadline 5 submissions

Examination Library ID	Name	Matter	Applicant’s Comment
REP5-281	Alan Bruce Marshall	I cannot see the need to ruin so much top quality agricultural land the length of East Anglia when there is clearly better ways to achieve the same goal!	The Applicant has taken into consideration the location of existing and proposed land use in establishing the baseline as part of the routing and siting studies to minimise any potential for direct impacts, where possible. 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] and the 7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 - Design Development Report for the Project [APP-359] and 7.20 2023 - Design Development Report for the Project [APP-358] describe the iterative development of the Project from the strategic proposal to the draft alignment, and document the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision C] . This provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner.
REP5-226	Aldham Parish Council	NG response to Action Point 34 in Document 8.5.8 – Colne Valley Aldham Parish Council supports and endorses the detailed rebuttal to the above response by Caroline Homewood. In particular, the failure in National Grid’s response to address the specific issue of cumulative impact in a sensitive location and an adequate explanation as to why the Colne Valley was assessed differently to the Waveney Valley.	The Applicant responded to the Deadline 4 submission by Caroline Homewood [REP4-386] from page 37 of 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192] . The Applicant has further responded to the Deadline 5 submission by Caroline Homewood in this document.
REP5-226	Aldham Parish Council	Aldham Parish Council also supports and endorses the detailed analysis of the Colne Valley through Fordham and Aldham in the submission by Pylons East Anglia (IPRN FBBCCB428). In particular, we concur with the conclusion that the alternative ‘western’ route brings no significant benefit and simply moves the problem elsewhere rather than overcoming the cumulative harm	The Applicant has provided a full response to The Landscape Partnership (TLP) report in Appendix D2.

Examination Library ID	Name	Matter	Applicant's Comment
		to the Colne Valley and also the Roman River Valley to the south. Landscape Assessment of Colne Valley and Roman River Valleys Aldham Parish Council has formally endorsed and helped fund the commissioning of a Landscape Assessment of the Colne Valley and Roman River Valley by The Landscape Partnership (TLP) , to assist in ensuring adequate consideration is given to the impact of the proposed pylons on both these important landscape features within North Essex. The report has been commented on more fully by Pylons East Anglia (IPRN FBBCCB428) in their submission to Deadline 5 (included as Appendix D. Colne Valley Landscape Study by the Landscape Partnership) but is also attached here for ease of reference as annex A. The Parish Council considers considerable weight should be given to the quality of the Roman River Valley, which has been covered in earlier submissions, and the fact that it remains a rare unspoilt landscape in this area, crisscrossed by Public Rights of Way affording long distance views largely unbroken by buildings or by urbanising structures such as pylons. The Landscape Partnership comments that the infrastructure would become a defining element of the view, substantially altering the visual experience of the route and adversely affecting the rural character of the Roman River Valley (Section 6.3.1) The TLP report concludes in section 8.7.6 that Taken together, the findings indicate the potential for widespread and significant adverse visual effects across the Area of Interest, affecting a range of visual receptors including walkers, recreational users, road users and local communities. The findings are therefore relevant to the considerations set out within paragraphs 2.9.24 and 2.11.6 of EN-5, which recognise that locations with a high potential for widespread and significant adverse landscape and/or visual impacts may warrant consideration of alternatives, including undergrounding.	
REP5-282	Alison Thomas	we have had notification that you are intending to use just outside our business premisses for a construction site. We are objecting to this it is not suitable, we have artic lorries in and out all day. We do not want to be held [sic] responsible for any accidents by construction lorries turning around in our drive. This will disrupt our business with day to day running. This road floods badly in heavy rain and the ditches are either side of where you are intending to use, diesel and debris from the construction vehicles will be going into the ditches which in turn will go into the river, its just not suitable the road is a small country lane. We do not want a pylon in view of our business premises, this will devalue our property, we have spent a lot of money and time in getting permission in developing this site not be totally destroyed by National Grid. I am also concerned about [redacted] if this pylon is going near us, the thought of it is making me [redacted] and	There is a site access point proposed within the vicinity of the business, approx. 120m away from the existing access to the business to enable access for construction traffic to join the construction haul road. The proposed Order Limits extend up to the business to accommodate visibility splays required for a design compliant and safe site access point; the works undertaken within the 120 m between the proposed access and the existing access shall be appropriate vegetation clearance to maintain the lines of sight. The Applicant has undertaken vehicle tracking analysis to confirm that the road is suitable for two-way HGV and crane movements. Existing ditches and highways drainage will be maintained and diverted if necessary. A Stage 1 Road Safety Audit has been undertaken for the proposed site access point to ensure safe access and egress. During the audit, no concerns were raised regarding proximity to the existing business access, or existing flooding; however, the Applicant also notes that any highway flooding issues are the responsibility of the Local Highway Authority.

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		stressed about going to work, I know being near one can effect your health.	The impact of traffic on this road has been assessed as part of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] which has shown that there is no significant adverse effect. The contractor will be required to ensure no contaminants or debris impacts on the environment as per the 7.2 Outline Code of Construction Practice [Revision F].
REP5-283	Anthony Wooldridge	National Grid have only recently admitted to us that they propose to demolish our well established and ancient woodland east of the B1029 Dedham Rd Ardleigh (OS TM04308983). They dismissed the option to mole bore under it and the B1029 under cost grounds alone and ignored the huge environmental impact that demolishing would have. The woodland is subject to TPO application no ID1780917978, and ancient woodland application status ref 550408. The woodland is a wildlife haven and particularly an important wildlife corridor between woodland to the south and north. The woodland borders the Dedham parish and conservation area, and is almost certainly home to bats. It is undisturbed habitat of national importance having been uncultivated heathland from medieval times and woodland since 1820. The matter has been discussed with National Grid, through Fisher German, on many occasions, but they have chosen to ignore the environmental impact on cost grounds. I therefore believe that they have not followed the correct Green Book rules in this case, and probably many other ones too. <i>[Applicant note: please see original comments in REP5-283 that includes an additional page which is predominantly a repetition of the comments above and has not been replicated here. Please also see original comments for images – they are not replicated in this document].</i>	The Applicant does not consider the woodland of concern to be ancient woodland. The strip of woodland is recorded as G207 in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] which records the group as having moderate value with mature oak trees contained within and the understory being dominated by ivy. A search of the Tendring Map Access Portal (on 17 June 2026) did not indicate any Tree Preservation Order (TPO) or ancient woodland in this area. Similarly, this woodland is not identified as an ancient woodland site on the Department for Environment, Food and Rural Affairs' Ancient Woodland Inventory as maintained by Natural England. Ancient woodlands are defined as those that have been in existence since the 1600s and so the fact that the woodland was in situ since 1820 does not make the woodland ancient. The Applicant will seek to minimise impacts to the woodland, commitment B08 in 7.2 Outline Code of Construction Practice [Revision F] states, '<i>All hedgerows, shrubs, trees or dense vegetation will be retained as far as is practicable.</i>' Impacts to the flora and fauna associated with the lowland mixed deciduous woodland, a Habitat of Principal Importance to biodiversity, have been assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Not all of the woodland strip along Dedham Road will require removal to facilitate the underground cable installation, with the working area being restricted to 75 m to minimise impacts. On a reasonable worst-case scenario the Project will require the removal of c.20% of the total woodland block along Dedham Road. On completion of works, replacement planting will be undertaken in line with the principles outlined within the 7.4 Outline Landscape and Ecological Management Plan [Revision F]. Short-term mitigation would also be provided to maintain the bat foraging/commuting route through the installation of a bat flyway and pre-construction surveys would be undertaken to confirm whether the trees that would be affected by the Project contain bat roosts. Replacement roosting sites would be provided to meet the conditions of a bat licence. The Applicant recognises the concern as outlined and, notwithstanding the comments above, continues to engage and negotiate collaboratively on the voluntary negotiations with the AP as it relates to the land rights and associated accommodation works required on the AP's holding. The last meeting to discuss these matters was on 12 May 2026 with the AP's agent.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	The Parish Councils have had the benefit of considering the submissions made by PEAL in respect of Deadline 5. They support the points raised by PEAL, but in particular the submissions made by Lord Banner KC concerning the interpretation and application of the Critical National Priority ("CNP") provisions within EN-1. As has been set out previously, the Parish Councils do not dispute the existence of an urgent	The Applicant notes this feedback from Ardleigh Parish Council and Little Bromley Parish Council. The Applicant has provided a response to the submission made by Charles Banner KC (Appendix C of [REP5-265]) at Appendix D3 of this document. The objectives of the Project are manifold and are set by statute, National Policy Statements (NPSs), statutory guidance and ministerial and other

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		national need for electricity transmission infrastructure, nor do they dispute that the Project falls within the scope of the relevant national policy framework. However, they respectfully agree with the proposition that recognition of a need for a particular type of infrastructure does not predetermine the acceptability of the particular means by which that infrastructure is delivered in any given case. In the Parish Councils' submission, the existence of national need does not relieve the Applicant of the obligation to justify the route selected, the siting of the East Anglia Connection Node ("EACN"), the adequacy of alternatives considered, or the sufficiency of mitigation proposed. Nor does the CNP policy diminish the need for careful scrutiny of cumulative effects, landscape impacts, effects on communities and the adequacy of environmental assessment. The Parish Councils therefore agree that the Examination must continue to assess whether the Applicant has demonstrated that the particular solution proposed is justified on the evidence before the Examining Authority.	guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia. At each stage of consultation, the Applicant has laid out our consideration of the alternative route options and technologies. The Applicant's consideration of alternatives is set out in 7.19 2023 - Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant's role is to carefully consider the most feasible options and present proposals for public consultation. We cannot present plans for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem. The proposals that the Applicant has chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by national policy (NPS EN-1 (2024) and NPS EN-5 (2024)). In terms of the consideration of alternatives, the Project has been developed to be consistent with NPS EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives, leading to the selection of the preferred option. The Project design has applied the mitigation hierarchy to minimise residual impacts and the need for the Project strongly outweighs those impacts. The mitigation hierarchy has been applied throughout development of the Project as part of the iterative Environmental Impact Assessment process which has informed the routing and siting process. The Project has been designed to avoid, reduce, compensate or mitigate potentially significant adverse residual effects. The application for development consent is supported by an Environmental Statement [APP-123 to APP-298] which demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project. CNP status, as defined in NPS EN-1 (paragraphs 4.2.16–4.2.17), provides the decision-making context once adverse effects have been identified, but does not remove or override the requirement to properly assess and pursuant to the mitigation hierarchy seek to avoid and reduce harm in the first instance. The Applicant therefore maintains that adverse effects have been appropriately identified and assessed, the mitigation hierarchy has been applied, and the subsequent balancing exercise is in accordance with the NPS framework and relevant policy.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	The Parish Councils draw the Examining Authority's attention to the recent request for further information issued by the Scottish Government's Planning and Environmental Appeals Division in relation to the proposed Kintore to Tealing 400kV transmission line inquiry. That request requires detailed additional assessment of agricultural operations, agricultural worker safety, machinery clearance issues, irrigation equipment, land use impacts and associated socio economic effects before conclusions can properly be reached regarding the significance of those effects. By way of example, the Parish Councils have recently corresponded with the manager of Holly Lodge Farm, Little	The Applicant has carefully considered and assessed the implications on agricultural operations and often concluded that there is more benefit to retaining greater separation to facilitate machinery movement. In making such decisions existing farm operations provide a basis. It is unrealistic and disproportionate to speculate extensively on equipment trends when there are also established methods to address unforeseen or unreasonable impacts. These points are addressed in the Applicant's responses to the Deadline 5 submission from Pylons East Anglia [REP5-264/5] in this document. The Applicant notes the concern regarding the safe operation of high agricultural machinery beneath overhead conductors. The design and

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		Bromley, regarding the practical implications of the proposed overhead line infrastructure for modern agricultural operations. Concerns have been expressed regarding the increasing size and height of modern agricultural machinery; the operation of GPS-assisted precision farming equipment; the growing use of drones for crop monitoring, land management and security purposes; conductor clearances and line sag; and the safety implications for lone workers operating large agricultural equipment in proximity to high-voltage transmission lines. In providing this information, the Parish Councils do not seek to advance technical conclusions regarding these matters. However, they note that such concerns closely mirror a number of the issues identified by the Scottish Government's Planning and Environmental Appeals Division as requiring further examination in the Kintore to Tealing matter. Whilst the Parish Councils do not suggest that the circumstances of the two projects are identical. However, they do submit that the Scottish inquiry demonstrates that concerns regarding the interaction between modern agricultural practices and major transmission infrastructure are capable of requiring detailed and site-specific scrutiny. In circumstances where similar concerns have been raised throughout this Examination, the Parish Councils invite the Examining Authority to consider whether sufficient information has been provided to assess the implications of the Project for agricultural operations and rural businesses within the affected area fully.	operation of 400 kV overhead lines is subject to statutory safety clearances and industry standards that provide for agricultural activity beneath the conductors. These clearances are designed to prevent arcing under normal operating conditions, including the passage of appropriately sized agricultural machinery. More information on working around overhead lines can be found in the National Grid's 'Third party guidance for working near NGET equipment' document¹.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	Appendix A - Ardleigh Parish Council and Little Bromley Parish Council's (ALBA) Response to the ExA's First Written Questions (ExA Q2)	The Parish Councils have provided extensive commentary on the Examining Authority's second written questions (ExQ2). The Applicant has reviewed these and acknowledges the comments; however, it does not consider it necessary to respond to each comment made, many of which are directed to the ExA and express support for the question or reiterate the Parish Councils' previously stated position on that topic. Therefore, selected comments are extracted in the rows below for comment, where the Applicant considers it appropriate and helpful to the ExA and the Parish Councils to respond.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	GEN 2.4 Report on interrelationship with other infrastructure projects The Parish Councils supports TDC REP3 -094 Cumulative effects [across NSIPs]. The Parish Councils would also point out that there is still not a clear map that shows clearly the interrelationship with other infrastructure projects, including order limits, haul roads, compounds and cable routes	The Applicant has provided plans showing the interrelationship of the Project with all the other projects considered in the Applicant's inter-project cumulative effects assessment. This is provided as Appendix C of 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163] . As well as the Project Order Limits, these plans show the extent of all the other developments. Detail such as haul roads, compounds and cable routes are not shown, due to challenges of scale and also as such detail still could be subject to change.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	DES 2.1 Independent Design Review – 1 The Parish Councils have previously requested maps and plans for the design of the overall site of the combined projects.	The Applicant has already addressed this in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] , specifically in response to GEN 1.14, including Appendix A. The plan is also included within 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296] , Appendix C.1. In addition, as set out in 8.4.12 Applicant's Comments on Post-Hearing

¹ National Grid (2021) *Technical Guidance Note 287 Third-party guidance for working near National Grid Electricity Transmission equipment*

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			Submissions and Interested Party Action Points [REP5-194] , Table 3.13, photomontages are provided at Deadline 6.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	DES 2.2 Independent Design Review – 2 NF & FE have both consulted directly with communities and run sessions for Parish Councils. The Applicant has not, despite requests that it do so.	National Policy Statements EN-1 (2024) and EN-5 (2024) do not impose a requirement for applicants to undertake an independent design review. The Planning Inspectorate note ‘Advice on Good Design’ does not mandate independent design review panels for Nationally Significant Infrastructure Projects (NSIPs); rather, it identifies a range of mechanisms through which good design outcomes may be achieved. Independent design review is one such mechanism, but not a requirement, and the choice of mechanism should be proportionate to the type of infrastructure and the scope for design influence. The Applicant has provided evidence and explained why we consider an independent design process is not required for the EACN in 8.9.2 Applicant's Response to Second Written Questions [REP5-211] submitted at Deadline 5. 7.16 Design Approach Site Specific Infrastructure (DASSI) [Revision D] had been updated at Deadline 5 to include details over the proposed Great Grid Partnership Design Review Panel (DRP) process at the detailed design stage. The DRP will undertake design reviews post-consent and is proposed to include a National Grid Community Liaison Officer who will inform local communities on the outcomes of the design review process, including Ardleigh Parish Council and Little Bromley Parish Council.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	BIO 2.1 Assessment of biodiversity deficit APC questions how the underground swathe of 120 metres plus 100m potentially affected can be fitted into the space between Peake Fruit Farm reservoir and Little Bromley Road. The Parish Councils do not consider that the current approach to replacement planting, habitat restoration, and Biodiversity Net Gain provides sufficient certainty regarding local delivery, long-term management, or successful ecological recovery. The Parish Councils seek reassurance that any screening and replacement of trees and hedgerows are properly maintained and monitored for several years. No map is available showing the overall areas in the ALBA where the removal of hedges and tree lines is proposed. These areas will also have been included in environmental/ ecological surveys. The Parish Councils ask “where are the reports” The Applicant has failed to meet the criteria set out in DEFRA’s Environmental Improvement Plan (EIP) published on 1 December 2025 (endorsed by the Secretary of State for Environment, Food and Rural Affairs – Emma Reynolds MP)	Whilst a 120 m swathe is the ideal to allow sufficient space for soil storage, cable swathe and the storage of topsoil, the construction footprint can be constrained where necessary. The 100 m of ‘potentially affected’ land is not additional to the 120 m, it is to allow for flexibility in design. 7.4 Outline Landscape and Ecological Management Plan [Revision F] sets out the clear principles for replacement planting/habitat restoration and identifies that the replacement planting is to be maintained and monitored for five years, to ensure that the planting establishes and exhibits healthy strong growth. After five years the care of this planting will lie with the landowner that would have been responsible for its care and maintenance prior to the Project. The planting in the Environmental Area around the newly proposed substation, known as the East Anglia Connection Node (EACN), will be managed and monitored for at least 30 years. 7.4 Outline Landscape and Ecological Management Plan [Revision F] is secured via Requirement 4 of the 3.1 Draft Development Consent Order [Revision F]. This planting would contribute to the Biodiversity Net Gain calculated for the Project as outlined in 7.1 Biodiversity Net Gain Report [APP-299]. With respect to hedgerow and tree removal, the plan that is relevant to the Ardleigh and Little Bromley Area is 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section C [REP4-031]. This plan has been produced to fulfil the requirements of a Development Consent Order application; it is not a UK government Environmental Improvement Plan and has not been produced for that purpose.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	BIO 2.3 Post-consent assessment work for bats	As identified in 6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036] bat flightlines have been identified in the vicinity of the Peake Fruit Farm Reservoir and as set out in 6.8 Environmental

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		Parish Councils support ExA question in that the information is vague as to the detail from the report. Local knowledge/ research indicates some of the following: • Bats, Skylarks and Nightingales have been observed and heard around the area of Home Farm Lane and Little Bromley Road, particularly Peake Fruit Farm reservoir. • Turtle Dove feeding strips (part of RSPB's Turtle Dove project) and Barn Owl box in Home Farm Lane and Little Bromley Road. There will be a permanent impact on these protected species. The Parish Councils would like more detail on the method used to assess bats and the locations of bat roosts in the area. Some landowners within the ALBA are still awaiting reports from surveys carried out on their land by the Applicant more than two years ago	Statement Chapter 8 - Ecology and Biodiversity [AS-026] mitigation would be provided to ensure that these flightlines are maintained during construction. The methodology followed and the survey results for the roosting bat surveys are provided in 6.8.A9 Environmental Statement Appendix 8.9 - Bat Roost Report [AS-034] and 6.8.A11 Environmental Statement Appendix 8.11 - Bat Radio-tracking Report [APP-173]. Further pre-commencement bat roosting surveys will be undertaken on any tree with bat roosting potential ahead of any tree removal. As identified in 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report - Redacted [AS-030] skylark have also been recorded in this area. The presence of turtle dove feeding strips has also been raised by respondents previously. The mitigation measures that protect roosting bats, and nesting birds including skylark and barn owl are set out in 7.4 Outline Landscape and Ecological Management Plan [Revision F]. The presence of turtle dove in this area is solely dependent on this supplementary feeding and so it would be possible to locate feeding areas in locations that would not be affected by the Project. The Applicant is unable to specifically respond to why survey data has not been provided as no names or addresses are given. The Applicant will continue to assess requests for survey information, as they arise.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	BIO 2.9 Assessment of impacts on birds The Parish Councils also support Pylons East Anglia Ltd REP4-369. Ardleigh has many lakes and reservoirs, including Ardleigh Reservoir Evidence has been submitted in previous submissions as to the scale and variety of bird life using these waterways. Numerous swans regularly congregate on the affected part of Ardleigh Reservoir. The Parish Councils question the judgement made by the Applicant that “additional monitoring or adaptive management is not considered necessary or proportionate” The Parish Councils would like to understand the use or dismissal of diverters on OHL's. How would the assessment be applied? BIO 2.10 Additional bird diverters Ardleigh Reservoir sits directly under the East Atlantic Flyway (a major “avian superhighway”) and acts as a crucial inland stopover and refuelling point for migrating birds. The Parish Councils have grave concerns over mitigation. NG needs to explain how diverters will work with so many birds flying together	The East Atlantic Flyway is underpinned by a series of Special Protection Areas (SPAs) and Ramsar sites along the east coast. A 5.3 Habitats Regulations Assessment (HRA) Report [APP-082] has been completed to determine whether any likely significant effects would occur to these sites of international importance. The HRA included an assessment of inland sites which could be functionally linked to the SPA and Ramsar sites along the coast. Ardleigh Reservoir was included in the assessment. As such, vantage point surveys were carried out at Ardleigh Reservoir to determine whether the installation of overhead lines could pose a significant collision risk to migratory and wintering water birds in this area. The assessment concluded there would not be a significant collision risk based on bird numbers, flight height and behaviour, with a particular focus on birds of conservation concern and those associated with the SPAs and Ramsar sites. Natural England has agreed with these conclusions outlined within the HRA. Despite this, bird diverters and coloured spacers (which mark the lines and as such make them more obvious to birds, triggering avoidance behaviour) will be installed as a precaution due to the sensitivity of the site. These are being installed despite the results showing collision risk as not significant in this area. The use of bird diverters alongside embedded design will ensure the mitigation is more than appropriate for this area and is in line with best practice mitigation measures outlined in NatureScot guidance and the National Policy Statement for electricity networks infrastructure (EN-5) (2024). The Applicant therefore retains its stance that operational monitoring of bird populations is not necessary, as the proposed bird diverters are considered more than appropriate and proportionate to mitigate the risk of collision.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	BIO 2.15 Impact of the proposed development on Five Estuaries and North Falls Offshore Wind Farms The Parish Councils are unclear on ‘quantity of native hedgerows’ that will be cumulatively lost within the ALBA. The	See response above against BIO 2.1. 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section C [REP4-031] shows the hedgerows that would be removed in the Ardleigh and Little Bromley Area. 7.4 Outline Landscape and Ecological Management Plan [Revision F] identifies that the replacement planting would be maintained and monitored for

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		Applicant should be required to confirm its plan in replacement planting/monitoring/servicing and this should be considered as a requirement to the DCO if granted.	five years, thereafter the care of this planting will lie with the landowner. The planting within the Environmental Areas would be maintained and managed by the Applicant for the lifetime of the Project.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	CA 2.1 C Anglia Ruskin University (ARU) Writtle The Parish Councils understand there is a similar situation in the ALBA, but where it appears landowners are being coerced into accepting Heads of Terms prior to a DCO being consented (the Applicant is offering early-signing incentive payments (up to 20% land rights value). These will be forfeited if signing is refused! The Parish Councils question as to whether these incentive payments have been included in the Applicant's costings?	National Grid offers an incentive payment for early signing of voluntary agreements as part of its Lands Rights Strategy as standard practice. Landowners are not coerced into accepting the Heads of Terms ahead of the Development Consent Order being consented. Rather, the Applicant seeks to acquire temporary and permanent rights under voluntary agreements with affected parties in line with standard commercial terms set out in its Lands Rights Strategy. All of which are considered in the Applicant's land budget.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	DCO 2.S11 Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows) There are a number of TPOs throughout the ALBA. The Parish Councils would like to understand what steps will be taken to protect them. For example, there are a number on Wick Lane and Little Bromley and Home Farm Lane. Concerns have recently been raised by a landowner in Ardleigh, who risks losing an established woodland to at least 200m of underground cabling swathe. This woodland has been in existence since before 1842 and provides a precious, undisturbed wildlife haven and corridor. The Applicant has stated to the landowner that the cheapest option was to remove the woodland. The other, less destructive option, of mole boring cables under the B1029 and wood, has been ruled out by the Applicant on cost grounds. The view of the Applicant being that the wood has insufficient environmental benefit as it is not classified as an ancient woodland. How will the Applicant adequately reinstate this habitat in any meaningful way? Further, and by way of an update, it is understood that in respect of this particular area of woodland an application is currently being considered by Natural England with regard to its possible status as ancient woodland. The reference number for that application is 550408.	The Applicant assumes that the woodland referred to is that owned by Anthony Wooldridge; the Applicant's response to Mr Wooldridge's specific comments is provided above against Examination Library REP5-283. The Applicant cannot comment on, and has no knowledge of, an application to Natural England. The presence of this woodland since 1842 would not usually be sufficient for it to be classified as ancient woodland, but it would depend on the evidence provided to Natural England and the determination of their experts. As set out in 7.4 Outline Landscape and Ecological Management Plan [Revision F], to mitigate for the removal of trees and shrubs new planting comprising a similar suite of native species would be provided. All tree and shrub removal is to be minimised to reduce the impacts to plants and animals. Every effort has been made to avoid direct impacts to woodland habitat through careful routeing, but it has not been possible to avoid impacts entirely. At detailed design the Applicant will look to reduce impacts to mature trees where possible. During detailed design consideration will be given to retaining trees as far as practicable including those covered by Tree Preservation Orders in Wick Lane, Little Bromley and Home Farm Lane. Measures to protect trees include tree protection fencing and supervision of works within root protection areas. See commitments GG08, GG14, GG31, B03, B13, LV04, LV05, LV09 and LV10 in 7.2 Outline Code of Construction Practice [Revision F].
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	HE 2.10 Assessment of impacts on archaeology The Parish Councils welcome this question. Concerns relating to an area of high archaeological potential and the survey methods employed by the Applicant are highlighted in [AS-065] "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh". To date, the Applicant has not shared any data on trenching results with either the local landowners or the Parish Councils. We have no knowledge of any significant finds, although records indicate a likelihood of Roman archaeology in the vicinity of the EACN, as two Roman roads converge on the proposed sites of the EACN and windfarm substations.	The Applicant notes the comment regarding the availability of archaeological evaluation data. The results of archaeological trial trenching have been made available as part of the Environmental Statement submission, including within 6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078], which is available on the Planning Inspectorate's website. These results have informed the assessment of effects presented in 6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C] and 6.11.A2 Environmental Statement Appendix 11.2 – Historic Environment Assessment Tables [Revision C]. The Applicant therefore considers that the available evidence base, including trial trenching and other evaluation, has been appropriately reported and taken into account in the assessment. With regard to the potential for Roman archaeology in the vicinity of the East Anglia Connection Node (EACN), this has been recognised and assessed

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			within the baseline and assessment (6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C] and 6.11.A2 Environmental Statement Appendix 11.2 – Historic Environment Assessment Tables [Revision C]).
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	NV 2.1 Noise & Vibration 1 The Parish Councils would like to understand how the construction noise levels will be monitored /mitigated for when unacceptable and the properties most affected? Also of concern is cumulative on-going noise from the EACN and other substations and noise from the pylon cables	7.2 Outline Code of Construction Practice [Revision F] includes a range of commitments relating to construction noise and vibration. Commitment NV01 requires the Main Works Contractor(s) to employ Best Practicable Means and follow good construction practices. Commitment NV05 requires the preparation of detailed construction noise and vibration assessments, including the identification of appropriate mitigation measures and any monitoring requirements. These will be documented within a Noise and Vibration Management Plan and agreed with Tendring District Council (and other relevant Local Planning Authorities) prior to the commencement of works via Requirement 4 of 3.1 Draft Development Consent Order [Revision F]. With regard to operational noise from the proposed East Anglia Connection Node (EACN) substation (both in isolation and cumulatively with the proposed North Falls and Five Estuaries substations), this is assessed in 6.14.A3 EACN Substation Operational Noise Assessment [APP-259]. The assessment demonstrates that significant adverse effects would be avoided, both in isolation and cumulatively. Operational noise from overhead lines is scoped out of the Environmental Statement on the basis that a low noise conductor system is proposed. Notwithstanding this, an assessment is provided in 6.14.A5 Operational Noise from Overhead Lines (Informative) [APP-261]. This confirms that operational noise from the proposed overhead line would not give rise to adverse effects under either wet or dry conditions.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	TT 2.4 Outline CTMP 2 The Parish Councils invite the Applicant to engage with them, as North Falls and Five Estuaries have in the past. There exists a joint specific group set up to address the cumulative projects: Planning and Infrastructure Working Group, reporting to both Parish Councils. The Applicant has always shown reluctance to do so during the consultation phases.	The Applicant has engaged with all Parishes along the route of the Project throughout the Project development including during the three consultations it carried out to inform Development Consent Order proposals, and intends to continue engaging proactively going forward. The Applicant works closely with North Falls, Five Estuaries and Tarchon to collaborate and coordinate so as to minimise impacts. The Applicant is aware of the joint working group and will be happy to attend to provide construction work updates where relevant and is committed to working with the other developers to provide joined up communications.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	Appendix B - Combined Cumulative Impact Ardleigh and Little Bromley	The Applicant's detailed response is provided in Appendix A of this document.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	Appendix C - Impacts on Public Rights of Way and recreational access in Ardleigh Parish <i>[Raises three principle concerns</i> <i>Disruption to Public Rights of Way and local walking routes in Ardleigh during construction</i> <i>Effects on cyclists and horse-riders during construction</i>	The Applicant acknowledges the presence of Appendix C, the content of which is directed at the ExA and is intended '<i>to assist the Examining Authority in its consideration of the likely effects of the Norwich–Tilbury 400 kV Project on Public Rights of Way and related recreational use within Ardleigh Parish</i>'. The Applicant has provided detailed information throughout the Examination on Public Right of Way (PRoW) matters, including the nature of impacts, indicative durations, management regimes, continued access arrangements, communication of impacts and mitigation measures. This information is set out in 7.6 Outline Public Rights of Way Management Plan [REP5-163] and the suite of 2.5 Access, Rights of Way and Public Rights of Navigation Plans

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		<i>Lack of detail on closures, their duration and access arrangements during construction, including to facilities such as the Ardleigh Reservoir</i> <i>Makes suggestions to the ExA for further information it should seek from the Applicant]</i>	[APP-034, APP-036, REP5-031 and REP5-035]. Assessment of the impacts of the Project on PRowS has been provided in 6.16.A4 Environmental Statement Appendix 16.14 - Traffic and Transport Construction Effects [APP-275]. The Applicant has also engaged with Parish Councils during the Examination, responding to comments and updating the 7.6 Outline Public Rights of Way Management Plan [REP5-163] accordingly. The Applicant has also confirmed that a final PRow Management Plan will be prepared by the Main Works Contractor, submitted to and agreed with the relevant Local Highway Authority agreement, and secured under Requirement 4 of the 3.1 Draft Development Consent Order [Revision F]. In this context, the Applicant does not consider it necessary to further respond to each individual comment set out in Appendix C, which is directed at the ExA. Should the ExA require any further commentary on the points made, a request can be made of the Applicant.
REP5-227	Ardleigh Parish Council and Little Bromley Parish Council	Appendix D - Deadline 5 ExQ2 Response Matrix - Ardleigh and Little Bromley Area (ALBA) <i>[Not replicated in in full in this document, please see REP5-227].</i>	The Applicant acknowledges the matrix provided by the Parish Councils in the Ardleigh and Little Bromley Area (ALBA), which it is understood is primarily for the benefit of the ExA. The Applicant has sought to respond substantively to submissions made by ALBA during Examination to date, including the matters represented in the matrix provided. The Applicant has provided its response to the relevant ExQ2 questions at Deadline 5 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211] and will review any comments ALBA has on those responses at Deadline 6. Should the ExA require any information relating to the ALBA matrix, this request can be made of the Applicant.
REP5-229	Babergh and Mid Suffolk District Councils	<i>[Applicant note: the table included in the original comments document REP5-229 has not been reproduced here due to formatting]</i> 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] Response to REP2-113, page 3 BMSDC welcome the engagement with the applicant to date regarding opportunities for strategic mitigation at Bramford substation. The Councils, together with SCC, have proposed measures to the applicant for consideration and remain in ongoing dialogue on this matter. It is noted that the applicant's response to proposals will be submitted at deadline 5. The Councils will review this and respond further at ISH4 / deadline 6 as appropriate.	The Applicant notes this response and will await further comments once the Council has reviewed the submissions made at Deadline 5.
REP5-229	Babergh and Mid Suffolk District Councils	<i>[Applicant note: the table included in the original comments document REP5-229 has not been reproduced here due to formatting]</i> 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] Response to REP2-113, page 5 From a recent and previous visits to Bramford substation, it is clear that the site is regularly manned. That notwithstanding, the cumulative effect of constructed, consented and reasonably foreseeable development connecting to the substation is	The Applicant notes the Councils' observation that personnel were present at Bramford Substation during site visits. Whilst staff and contractors may attend the site for inspection, maintenance, switching operations, construction activities or project-specific works, Bramford Substation is designed to operate unmanned under normal operational conditions. The presence of personnel on a particular day, particularly during periods of construction or other project activity in the vicinity, does not alter the fundamental operational characteristics of the substation.

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		considered to materially alter the risk profile of the surrounding area. On this basis, the Councils maintain their positions that National Grid, as asset operator and connection offeror, are responsible for appropriate mitigation of the cumulative effect of development connecting to Bramford substation that is driven by connections offered by National Grid.	The Project would not result in a material increase in routine staffing requirements or operational vehicle movements and therefore does not materially alter the operational profile of the site. In relation to cumulative development, the Applicant does not agree that its role as asset owner and connection provider makes it responsible for mitigating the effects of separate developments promoted by third parties. Whilst such developments may connect to the transmission network at Bramford, each remains subject to its own consenting process, environmental assessment and regulatory requirements, through which its impacts, risks and any necessary mitigation are assessed. The Applicant has assessed the effects of the Project, including cumulative effects where required by the relevant assessment methodology. The Applicant does not consider that the Project, either alone or in combination with other developments, gives rise to a material change in the suitability of the existing operational arrangements or access arrangements associated with Bramford Substation.
REP5-229	Babergh and Mid Suffolk District Councils	[Applicant note: the table included in the original comments document REP5-229 has not been reproduced here due to formatting] 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] Response to REP2-113, page 8 The Councils welcome the opportunity to discuss the DASSI and design approach and confirm this engagement has not yet taken place.	The Applicant's update of 7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision D] at Deadline 5 provides additional details on the Design Governance to be adopted at the detailed design stage, including the roles of the Design Champions and Design Review Panel. The Applicant has since notified Babergh and Mid Suffolk District Councils about the further detail provided at Deadline 5, also confirming that we welcome any feedback and where appropriate will seek to incorporate suitable revisions ahead of Deadline 7.
REP5-231	Boxford (Suffolk) Farms Ltd	1. Compulsory acquisition – extent and necessity First, on compulsory acquisition. Our fundamental concern is that the powers and land rights being sought go beyond what is reasonably required to construct, operate and maintain the scheme. Land has been included within the Order Limits: • where the width of construction and safeguarding corridors appears excessive given the land use; and • to allow for diversion of third-party electricity apparatus, without sufficient detail for the Examining Authority to be satisfied that this land is genuinely required. Furthermore it is considered that the justification for avoiding the land to the south, being the safeguarding of mineral deposits has not been fully explored, specifically relating to the economic impact of the scheme.	Following a meeting on the 8 June 2026 the Applicant has clarified that the land marked on plans encompasses Limits of Deviation and that the actual requirement will be defined by the final detailed design. It is also understood that UK Power Networks are anticipating the installation of an extension to existing underground cable within non-productive areas (within the Order Limits). Constructive dialogue between the Applicant and the Affected Party has clarified some aspects of the potential claim. A conclusion from this is that there remains a disproportionate impact from the cable being routed through the minerals site compared with the horticultural site.
REP5-231	Boxford (Suffolk) Farms Ltd	2. Construction Impacts: Loss of Blueberry Plantation and Economic Consequences Turning to construction impacts, and in particular the proposed haul road and construction methodology. The affected land supports an established blueberry plantation, forming part of an intensive horticultural operation supplying	The Applicant acknowledges the potential for effects of the general manner described by the Affected Party (AP). Constructive dialogue between the Applicant and the AP has confirmed that blueberries can be grown above the cables. Discussions also identified further opportunities to avoid or reduce effects and to seek to mitigate residual effects through a combination of timing and design. The Applicant is reviewing the detail of the designs prior to further

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		major UK retailers. Blueberries are highly sensitive to soil compaction, drainage and PH levels, and once the soil is damaged it cannot be readily remediated. The proposed haul road and prolonged heavy trafficking in addition to the cable laying works, would, in practical terms, lead to the loss of the blueberry plantation within the affected area. This is not a temporary impact. Blueberry crops take many years to establish and reach full productivity, and their loss would result in: • a long-term reduction in output; • disruption to contracted supply arrangements; and • significant economic consequences for the wider farming and packing business. The suggested construction methodologies—whether excavation and stone placement or ground stabilisation using cement-based materials—pose serious risks to soil structure and long-term fertility. Neither approach has been shown to be compatible with the future horticultural use of this land. These impacts extend beyond crop loss alone. The blueberry crop is a vital part of certain supply contracts and underpins employment and packhouse throughput.	engagement to establish the basis for taking the works forward and the basis for a settlement agreement. 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 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 [Revision C]. As such, once land has been returned, pre-construction land use will be able to continue.
REP5-231	Boxford (Suffolk) Farms Ltd	3. Reservoir and water-quality risk The reservoir immediately north of the construction area is not incidental. It is central to the viability of the entire farming and packing operation. It supplies irrigation water for soft fruit, stone fruit and glasshouse crops, all of which are grown for human consumption and supplied under long-term supermarket contracts. Any contamination of this reservoir – whether by sediment, chemicals, cementitious material, fuel, or changes in groundwater behaviour – would result in: • loss of usable irrigation water; • potential contamination of crops; • consequential losses across the wider business. The mitigation described to date, including within the Outline Code of Construction Practice and Soil Resource Plan, does not adequately address this risk. Generic measures such as bunding and seeding are not sufficient. Furthermore, it remains unknown whether the underground cable works will affect groundwater flows, and by extension the reservoir's long-term water levels and reliability.	The important role of the reservoir in the business is understood. Following a constructive meeting on the 8 June 2026, the Applicant is seeking to set up a meeting on site to discuss any bespoke measures, over and above those secured via 7.2 Outline Code of Construction Practice [Revision F], that could be deployed to protect the water quality of the water supply. The design and depth of cables is not anticipated to restrict infiltration rates nor alter any surface water flow pathways. In relation to the concerns relating to groundwater quality and flows, we have nothing further to add to the response we provided in 8.8.1 Applicant's Comments on Written Representations [REP2-029], in response to the written representation received in [REP1-208]. Temporary disruption to farming operations during construction would be reduced through good practice, such as: maintaining/ providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [Revision F]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example in relation to temporary land take, reduced yields due to irrigation disruption, etc.).
REP5-231	Boxford (Suffolk) Farms Ltd	4. Long-term impacts on irrigation and land use Beyond construction, the scheme creates permanent operational constraints. Once the underground cable is installed, the farm's ability to:	Constructive dialogue between the Applicant and the Affected Party has identified opportunities to avoid or reduce effects and to seek to mitigate residual effects through a combination of timing and design. The Applicant is reviewing the detail of the designs prior to further engagement to establish the basis for taking the works forward and the basis for a settlement agreement.

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		• lay new irrigation pipes; • adapt irrigation layouts; or • respond to future climatic and production pressures will be severely constrained, more costly, or rendered impractical. These impacts are not easily quantifiable, but they are real. Similarly, overhead lines introduce expanded sterilisation due to health and safety constraints, restricting crop protection systems such as hail netting and tunnel-type structures that are essential to modern horticulture.	The Applicant would not expect the presence of cables to interfere with the installation or operation of irrigation systems and associated pipelines. Design review is considering clearances achieved prior to the implementation of any mitigation with further engagement anticipated to discuss how this should be responded to. During route optioneering the impacts on agricultural land, including on agricultural land-take (such as sterilisation) 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]. The Applicant has also made several commitments to maintaining provision for land drainage, including agricultural drainage and irrigation systems. These are detailed in commitments AS05 and W04 within 7.2 Outline Code of Construction Practice [Revision F], as well as to safeguarding runoff patterns and the water quality of watercourses and water bodies.
REP5-231	Boxford (Suffolk) Farms Ltd	5. Conclusion In conclusion, Chair, our concerns are not theoretical, they are a very real threat to the group of companies, not only posing quantifiable risks, but those that are unknown. We respectfully ask the Examining Authority to give these matters careful weight and to ensure that: • only land that is strictly necessary is acquired; • bespoke protections are secured for the reservoir and irrigation infrastructure; and • the Applicant is required to provide site-specific, enforceable mitigation before any compulsory powers are granted.	Constructive dialogue between the Applicant and the Affected Party has confirmed that blueberries can be grown above the cables. Discussions also identified further opportunities to avoid or reduce effects and to seek to mitigate residual effects through a combination of timing and design. The Applicant is reviewing the detail of the designs prior to further engagement to establish the basis for taking the works forward and the basis for a settlement agreement
REP5-234	British Pipeline Agency Limited as agents for United Kingdom Oil Pipelines Limited	1. Update 1.1 BPA / UKOP continue not to have objections to the Project in principle, however they cannot support the draft Order in its current form until their concerns are fully addressed and suitable protections are secured, preferably by private treaty. 1.2 BPA / UKOP acknowledge the Applicant's constructive engagement and ongoing efforts to agree contractual protections for the Pipeline, with the aim of reaching a settlement by Deadline 6 so that the objection can be withdrawn. 1.3 However, until adequate mitigation measures and long-term safeguards are guaranteed and formalised, BPA / UKOP maintain that there remains a significant risk of damage to the Pipeline, including accelerated corrosion, which could endanger the public, the environment, and the resilience of nationally significant fuel infrastructure. Those risks and the need to protect critical national infrastructure are set out in BPA / UKOP's earlier submissions. 1.4 BPA / UKOP acknowledge that this risk can be ameliorated as a result of the confirmation of the Order within the change application as submitted on 27 March 2026 and the completion of an Asset Protection Agreement in appropriate terms which both	The respondent's position is noted; the Applicant has significant and ongoing engagement with the respondent making progress towards finalising a legal agreement between both parties which seeks to address BPA/UKOP's concerns. The Applicant reiterates its intention to agree this within the Examination window and acknowledges the respondent's ongoing cooperation and efforts in this respect.

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		parties are putting substantial efforts in to resolving as quickly as possible.	
REP5-235	Burstall Parish Council	1. Security, Resilience & Continuity. Burstall Parish Council (BPC) has reflected on the previous responses from NGET regarding security and resilience. We also note that the ExA has requested the information for a second time in ExQ2 (SS2.1), and we support the Inspector's clear direction to NGET that confidentiality is not a valid excuse to withhold vital information from the Examination. However, in addition to confidentiality concerns, previous responses from NGET repeatedly claim that Major Accidents and Disasters (MAD) were scoped out of the EIA at the Scoping stage, and so they are not required to assess the risks and impacts in the ES now. BPC is reminded by our past experience that sometimes policies and legal principles must be explicitly stated. Even the most fundamental ones. This is not because the professionals forgot they existed. It is because something that is not explicitly stated on the formal record can be dismissed later on the grounds that no one actually said it. BPC continues to assert that MAD was not scoped out. However, even if it was scoped out, Regulation 10 (10) of The Infrastructure Planning (Environmental Impact Assessment) 2017 states: <i>"When the Secretary of State or the relevant authority has adopted a scoping opinion in response to a request under paragraph (1) or (2), neither the Secretary of State nor the relevant authority shall be precluded from requiring of the person who made the request additional information in connection with any statement that may be submitted by that person as an environmental statement or an updated environmental statement in connection with an application for an order granting development consent or a subsequent application for the same development as was referred to in the request."</i> This means that the Scoping Opinion is not an immovable document carved in stone. It is a flexible and evolving opinion, and the ExA and Secretary of State have the right to request additional information from an Applicant at any point before a decision is published. As this Examination has evolved, the ExA has deemed it necessary to request security and resilience information in order to make an informed decision. They have asked for it twice now, and NGET are obliged to provide the information. Further, it is essential that any assessment of MAD clearly defines worst plausible case scenarios. We remain concerned that the applicant's definition of worst plausible case is incorrect and therefore misleading. It must include:	The Applicant has responded to the Examining Authority's previous questions on security and resilience (see Table 15.1 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and Table 14.1 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211], and has provided additional information where requested during the Examination. Those responses should be read alongside the application documents, which together explain the approach taken to the design, operation and protection of the Project. The Project forms part of the strategic reinforcement of the national electricity transmission system and has been developed to increase network capacity, operational flexibility and system resilience. By reinforcing the existing transmission network and increasing electricity transfer capability, the Project supports the secure and reliable operation of the wider electricity system and facilitates the connection of increasing volumes of low-carbon generation in accordance with national energy policy. The Applicant therefore does not agree with the suggestion that the Project introduces additional resilience concerns; rather, it forms part of the wider programme of reinforcement required to maintain and enhance the resilience of the national electricity transmission system as electricity demand and sources of generation continue to evolve. As set out in previous submissions, security and resilience considerations are not limited to compliance with the National Electricity Transmission System Security and Quality of Supply Standards. The development of critical national infrastructure is supported by a wider framework of engineering standards, operational procedures, security design principles and engagement with relevant government and security stakeholders where appropriate. These established processes consider the resilience and continuity of the transmission system throughout the design, construction and operational life of the asset, including consideration of credible operational disruption scenarios. The Applicant notes Burstall Parish Council's comments regarding worst-case scenarios and Major Accidents and Disasters. The Applicant remains satisfied that the Project has been assessed in accordance with the applicable legislative, regulatory and policy requirements. Security and resilience considerations have informed the development of the Project throughout the Project lifecycle, with appropriate governance and assurance processes continuing through detailed design, construction and operation. The Applicant does not agree that the Examining Authority's request for further information demonstrates that the Environmental Statement is incomplete. The Examination process enables matters raised by Interested Parties and the Examining Authority to be clarified where appropriate, ensuring that the Secretary of State is able to reach a fully informed decision. Consistent with previous responses, detailed security assessments, threat modelling, operational contingency arrangements and specific mitigation measures are not appropriate for publication due to the sensitive nature of critical national infrastructure. The Applicant nevertheless considers that sufficient information has been provided throughout the Examination to demonstrate that security and resilience have been appropriately considered in

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		a. Unforeseen incidents and accidents, including sabotage and attack; b. Incidents at collocated sites, such as BESS; Both of which may cause catastrophic impacts and prolonged outages. The applicant is request to provide visibility of the worst case scenarios used, if this was covered, as stated, by their response to first written questions (REP3-101). BPC wishes to add that whilst we make this point with security and resilience as our primary example, it applies equally to all topics where the ExA or Secretary of State requests information in order to complete the ES and to reach an informed decision. Failure to provide the necessary information requested by the ExA (or later by the Secretary of State) renders the ES incomplete, and as asserted in our previous submissions, legally prohibits the granting of a DCO.	the development of the Project, while recognising that certain operational security information cannot be placed in the public domain.
REP5-235	Burstall Parish Council	2. Cumulative Impact & Lack of Mitigation. We note ExA's questions concerning cumulative impact (GEN 2.3 & 2.5), but would have also expected specific mention of the Bramford Substation and Burstall village, where we would argue the cumulative impacts will be most strongly felt, as the only location impacted by both the Bramford to Twinstead project, the Norwich to Tilbury project and various other infrastructure projects, specifically the Brunfort BESS which must be included in the applicant's assessment of interrelationships (GEN2.4) (REP3-181 - the applicant states the Brunfort BESS has not been included in the cumulative assessment). The cumulative assessment for the Brunfort BESS must be based on the 1.5GW capacity being applied for by Alcemi, not 500MW as listed, which is just their initial application. DES 2.3 highlights the issue of substation extensions and we hope will include analysis of the extension to the Bramford Substation, which has already taken place and appears to be on artificially raised ground. The fact that there is no mitigation offered to the Bramford Substation or Burstall village is significant and must be addressed.	The Applicant has monitored planning applications throughout the examination period, in accordance with Planning Inspectorate Guidance Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessments². The Brunfort Battery Energy Storage System (BESS) submitted a request for an Environmental Impact Assessment (EIA) Scoping Opinion in May 2026. This application is being captured within an update to the assessment in 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163] which will be published at Deadline 7. The update at Deadline 7 will capture applications submitted between 1 February 2026 and 8 May 2026. The Applicant can confirm the assessment is based on the 1.5 GW capacity BESS being applied by for Alcemi, as detailed in the description of the development in the May 2026 application for the EIA Scoping Opinion. Opportunities to reduce cumulative effects have been explored, however no additional mitigation has been identified in addition to the mitigation already detailed within environmental topic chapters of the Environmental Statement.
REP5-235	Burstall Parish Council	3. Heritage Impact. REP3-181 - the applicant has stated that the heritage assets of Burstall Hall, and the moat at Burstall Hall are of low value, outside the order limits and therefore have not been assessed. Further, applicant states that the 'embedded mitigation has been advanced to reduce cumulative effects' by burying 132kV only to replace them with much larger and more visible 400kV lines, which 'would not significantly alter the setting of heritage assets in the wider landscape' and that 'residual cumulative harms	The Applicant acknowledges Burstall Parish Council's comments regarding the assessment of effects on the setting of heritage assets, including Burstall Hall and the associated moat, and the suggestion that cumulative impacts and wider landscape context have been understated. The Applicant's position on cumulative impacts on the historic environment has been addressed in detail in 8.17 Response to Rule 17 Letter – Historic Environment [REP4-318], under Methodology – 1 (pages 1–3), in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] and in response to ExQ1 HE 1.8 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].

² Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessments*

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		remain at the very low end of the spectrum, consistent with the mitigation hierarchy’. These statements take no account of any cumulative impact, the impact on the ‘historic character’ of the area, or the impact on the wider rural context (as defined by Virginia Brewer), and must therefore be revisited as we believe they are understating the true impact. These statements are simply incorrect and require review.	The assessment has been undertaken on an asset-by-asset basis, in accordance with the National Planning Policy Framework³ and National Policy Statement EN-1 (2024), with harm identified for each heritage asset individually. Where the significance of assets is informed by wider landscape or spatial relationships, including their rural context or historic character, these factors have been taken into account within the individual assessment of each asset. Cumulative effects have been assessed in accordance with legislation and guidance, including both intra-project effects and inter-project effects, and are appropriately captured within the assessment and planning balance. Accordingly, the Applicant does not agree that the assessment understates the effects on the historic environment, including the wider rural context, and considers that the conclusions presented in the Environmental Statement remain robust.
REP5-235	Burstall Parish Council	4. Site Inspection Gaps	The Applicant acknowledges Burstall Parish Council’s comments regarding the site inspection. This is a matter for the ExA and therefore the Applicant does not provide any specific comment.
REP5-235	Burstall Parish Council	5. Hedgerow destruction. Burstall PC and residents were extremely disappointed to witness large sections of mature and established hedgerow removed at the height of the bird nesting season at the Orchardlands area of Burstall. Whilst this was part of a separate project, the Bramford to Twinstead reinforcement, what appeared to be a blasé approach, with no more than lip service being paid to ecological checks, makes us deeply concerned about the precedent this sets and the apparently willingness to try to ‘get away with it’. We can see no reason why removing this hedgerow during nesting season was necessary and why doing it outside the nesting season was not practicable. We would like to know who was responsible for giving the go ahead, what alternatives were considered, why these were not suitable, and how many live nests were identified and avoided during this clearance. Whilst we are aware this is outside the remit of the ExA to answer, we ask that special attention is paid to relevant conditions in the N2T project.	The Applicant notes the comments regarding a separate National Grid project, the Bramford to Twinstead Development Consent Order (DCO). As noted by the Parish Council, the works being undertaken for that consented project are not within the remit of this Examination. However, the Applicant can provide clarification. All vegetation activities associated with the Bramford to Twinstead project are carried out in line with the project’s DCO and licences issued by the relevant authorities. For the works being referred to, Natural England granted a licence permitting vegetation clearance during specified windows, including May and from mid-September, to manage impacts on dormouse habitat. A qualified ecologist was on site throughout, and nesting bird checks were carried out before and during works. Any vegetation removed as part of the project will be replanted in line with plans agreed with the relevant Local Authorities. The Applicant reiterates that protecting wildlife and complying with environmental legislation is fundamental to how we deliver our projects.

³ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

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REP5-284 & REP5-309	Caroline Homewood Robert David Wass	<i>The Applicant notes that the submissions by Caroline Homewood and Robert David Wass are very similar in content and upon detailed review of the submissions the Applicant has identified that the concerns they raise are materially the same. Furthermore, the submissions are an extension/update to points raised by the same respondents at Deadline 4 in REP4-386 and REP4-416.</i> <i>To avoid repetition, the Deadline 5 submissions are therefore not replicated in full but can be summarised as raising the following key concerns:</i> • That the Applicant has not sufficiently answered a number of the ExA's written questions as posed through ExQ1, including in relation to heritage, landscape and cumulative effects. The response to ISH2 Action Point 34 is also insufficient. The ExA therefore do not have an adequate response to their questions or the Action Point. • That the Environmental Statement does not assess cumulative effects of the route corridor TB46 to TB57 and the impacts to the continuous landscape corridor of Fordham, Ford Street and Aldham; rather, assessments have been carried out individually per topic. • The Applicant's differing position on undergrounding through the Colne Valley and Waveney Valley is not justified or comparable; the lack of undergrounding in the Colne Valley has not been sufficiently informed by a cumulative effects assessment, as it has in the Waveney Valley. The approach is inconsistent.	The Applicant notes the matters raised in the submissions and responded in detail at Deadline 5 to similar concerns raised by the Interested Parties at Deadline 4 within 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], page 37-46, Caroline Homewood, and 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194], page 84-86, Robert David Wass. The Applicant refers to those responses as addressing the points raised again at this deadline. The Applicant notes the respondents' opinion that its responses to ExQ1 and the Hearing Action Point ISH2 34 are not sufficient. The Applicant disagrees with this position and notes that should the ExA require more information than has been provided, this request can be made of the Applicant. The Applicant disagrees regarding the Colne Valley and its position is that all areas have been carefully and consistently assessed.
REP5-285	Charles Micklem	Section 172 I believe National Grid are abusing their powers with regards to a section 172 they have threatened to serve on me. As of Monday 1st June 2026, Fisher German confirmed to me and National Grid in a email on the 2nd June that the notice has been drawn up. This is all due to me questioning National Grids licence that I received on 25th February 2026 at a meeting with Fisher German on the same day at Whirledge and Notts office. I have been question National Grids compensation for boreholes they are planning to place on our land as stated in my deadline 4 submission. Having questioned the boreholes, Fisher German asked me to supply evidence that backed up my claim, which I have and it shows that artificial fertiliser is more expensive than organic manure. This was asked for on the 13th April and I replied the same day. I have chased this up on multiple occasions, phone calls were made to Fisher German on 12th March, 18th March, 24th March, 9th April, 23th April, 27th April, 29th April, 26th May, 28th May and 1st June. All of these phone call resulted in no new information and being told they haven't forgotten about the question and they are working on it. I mentioned the borehole question directly to an employee of National Grid in a meeting at Ipswich stadium with Fisher	Section 172 of the Housing and Planning Act 2016 provides a statutory power enabling an acquiring authority to enter land to undertake surveys and investigations where the surveys are required in connection with a proposed compulsory acquisition or acquisition of rights. The Applicant utilises these powers to facilitate the engineering, environmental and land surveys necessary to develop Nationally Significant Infrastructure Projects where access cannot be secured voluntarily. In this instance, we understand the concerns raised by the affected party. However, we have been unable to obtain a definitive response from the relevant bodies that would resolve the outstanding issue and enable a voluntary agreement to be reached. Given the programme requirements and the need to maintain project progress, the Applicant has had to proceed using its powers under Section 172. Since initiating this process, we have now established a position as to how we wish to proceed and will communicate this to the affected party at the meeting scheduled for 9 July. We hope this will help resolve the outstanding matter and allow an agreed way forward to be identified.

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		German present after the Compulsory acquisition Hearing and emailed my evidence the same day. This was on 30th April. No one has been able to answer my question, and I have now been informed that National Grid is drawing up a position statement on this for the entire project due to me questioning it, yet still doesn't provide me with any reply. When reading the Housing and Planning Act ("HPA") 2016 and the Ministry of Housing, Communities and Local Government guidance on compulsory purchase orders it reiterates the importance of engagement with landowners to attempt to reach agreement for land access before serving a section 172 notice. National Grid have not engaged with myself apart from saying they are investigating. How can they not answer a question asked in February and followed up several times, and deem this not acceptable engagement with the landowner. I have not held up the licence, having either replied the same day or the day after to their question. I have even come up with suggestions to National Grid, asking if they take out the boreholes from the licence, until they can provide an answer to the question. I would happily sign the licence, but having suggested this several times, National Grid ignores all these request. I have been informed today (via my agent who was told by Fisher German)(10th June) that I am being served the notice tomorrow (11th June). Despite repeatedly telling them that this is unfair, given that we are still waiting for answers from them. However, they have said they are aware of this and are proceeding anyway. THIS SHOWS THAT THE LICENCES ARE NOT VOLENTERY BUT DICTATED ON YOU BY NATIONAL GRID. [Applicant Note: please see original REP5-285 for screenshots of emails – they are not replicated in this document].	
REP5-285	Charles Micklem	Langleys I would like to thank the planning inspectorates for their time coming out to Langleys and seeing how the pylons will impact us, I hope you found it helpful However as pointed out that most of the screening National Grid states protects the house are cricket bat willows which are a commercial crop. I have attached drone pictures and will highlight that most of the trees that can be seen are cricket bat willows. I have highlighted in red the trees that are not cricket bat willows from that protect the view. This shows a distinct difference to the picture that National Grid tries to portray. <i>[Applicant Note: please see original REP5-285 for images – they are not replicated in this document].</i> Finally at a meeting with National Grid on 1st June, we were shown pictures of where the pylons will be located having been asking for months for this information. The above drone picture shows the view from the new location at 50m, and the picture below shows the same location just at 40m. This shows that not much difference to Langleys with the reduced hight, which lucky	The Applicant met with Mr Micklem at Langley's on 1 June 2026. The landowner was shown images of the proposed locations of the pylons over this land holding, which has been subject to change as a result of design considerations being established around Deadline 4. The four pylons to the north of the River Chelmer remain as low height pylons, and the three to the south are being replaced by two standard height pylons. Whilst noting the respondent's preference and ownership, the Applicant must also respond to the inherent heritage characteristics of Langleys which is a Grade I listed building. As a consequence of this, and in recognition of the consideration this attracts in terms of policy, this takes precedence over the opinion of the owners and the appropriate design for the four pylons north of the River Chelmer is the low height lattice. Where possible we do seek to respond to landowners' preferences but have to be mindful of other policy factors. The Applicant acknowledges the comments regarding the information used to inform the assessment of Langleys. The assessment has been informed by the desk-based assessment set out in 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [Revision B], which draws on publicly available sources, including the National Heritage List for England and other relevant documentary and mapping evidence. The

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		National Grid will go with the taller ones. However, I would like you to compare the images presented here with that from National Grids view point HE7: Langleys. This implies that not only will you not see the pylons, you wouldn’t even see the lines. The drone pictures show a different story, if I can see the house from the position of the pylons, then from the back of the house I would be able to see the pylons. <i>[Applicant Note: please see original REP5-285 for images – they are not replicated in this document].</i> I also take offence that National Grid stated in the Issue specific hearing and again in writing in document 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 (Final Issue A) <i>[Applicant Note: please see original REP5-285 for hyperlink – it has not replicated in this document]</i>, that a desktop survey was taken to determine that no rooms of significant we on the above floors. My family built the house in 1720 in its current form, this house has never been open to the public and no plans are publicly available. Please can national grid release to me, their desktop survey as I want to know how they have come about information about a house that they have never entered and no plans are online to show they have actually completed this. Also nation Grid in our meeting on 1st June confirmed that there are four low height pylons to the north of the River Chelmer (as discussed, the need for these was identified in response Heritage effects) The heritage effect is that Langleys park and garden. My family created this asset, and have been responsible for maintaining it, yet our views are being ignored by national grid and we have lost full control. We would like all the pylons to be the tall pylons rather than short as a change it hights will make them more distinctive and less likely to blend in if they are all different.	Applicant confirms that the baseline information has been compiled in accordance with standard archaeological and heritage practice and provides an appropriate evidence base to inform the assessment of effects. Viewpoints captured in the area of Langleys Hall (including HE7, HE8 and 6.18), included in 7.12 Visualisations - Part 8 of 9 [APP-350] and 7.12 Visualisations - Part 7 of 9 [REP4-181] were taken in accordance with Landscape Institute Technical Guidance Note 06/19⁴. All photography was taken at 1.5 m above ground level, representing a reasonable typical viewing height. A 3D model of the proposal was aligned with each of these viewpoints, and a photomontage generated over the baseline photography to provide an understanding of visibility from the selected locations. A full methodology is available in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The produced visualisations are geolocated and verified using GPS, with height positions based on Environmental Agency composite 2 m LiDAR DTM, with a vertical accuracy of +/- 15 cm. The drone-captured images demonstrate a height of 40 m and 50 m above ground, noting that the height shown here is usually relative to the take off point, rather than the ground above which it is positioned. On review of the drone photography supplied by the respondent, two trees have been highlighted which are not cricket bat willows. Alongside these trees, the Applicant has assumed a number of darker-leaved, stand-alone mature deciduous parkland trees are not part of the crop. In a worst-case assumption that the crop is removed entirely, other vegetation, including parkland trees and garden vegetation, would filter and screen views towards the Project from Viewpoints HE7, HE8 and 6.18. The inversion of the assessment, viewing the house from the pylon, rather than the pylon from the house, risks distorting the understanding of visual effects. From the elevated position on the pylon, the house presents as a substantial and solid built form, whereas the pylon itself is a permeable structure and only its uppermost section is visible. Consequently, the house appears more visually prominent than the pylon when assessed from that elevated viewpoint. It is also notable that the viewpoint location HE7 does not appear to be visible from the drone’s vantage point, at the base of the house, aligning with the visualisations presented to date.
REP5-287	Christopher Renham	Why are you wasting money on a public opinion survey? Just a matter of “due process” because you don’t listen and have already made your decision. Nobody ...nobody at all wants these huge pylons across the Essex skyline. Least of all me spoiling the setting of my ancient country church home. You have had your survey so now listen to the people. Put them underground.	The Applicant acknowledges the objection to the Project. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

⁴ Landscape Institute (2019) *Technical Guidance Note 06/19 Visualisation of development*

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REP5-288	Claire Lanham and Dick Lanham	The Applicant proposes to access land through the main residential entrance serving [redacted] Farm and to route construction traffic and contractors directly through our residential curtilage. The proposed access route passes within only a few metres of our family home. This raises significant concerns including: • Safeguarding concerns arising from the regular movement of contractors and construction traffic immediately adjacent to our home and where our children live and play; • Loss of privacy and residential amenity; • Noise, dust and disturbance associated with construction activities; • Biosecurity risks associated with external contractors and vehicles entering an active farming enterprise; • Impacts on grazing land, livestock management and animal welfare; • Impacts on the operation and viability of our farming business; • The potential loss of commercial arrangements connected to our farming activities as a direct consequence of biosecurity concerns. • Impacts on the operation and viability of our farming business; • The potential loss of commercial arrangements connected to our farming activities as a direct consequence of biosecurity concerns. The Interested Parties consider these impacts to be severe and disproportionate. Importantly, we are not objecting to access in principle. We are objecting to the Applicant's chosen access route. For approximately two years we have identified and presented an alternative access route to National Grid and Fisher German. A plan showing this alternative route is attached. The alternative route would avoid the residential curtilage of [redacted] and substantially reduce the safeguarding, privacy, biosecurity and operational impacts identified above. The Interested Parties also attach a National Grid/Fisher German plan which appears to demonstrate that access and working arrangements are already proposed in land to the west and north-west of [redacted] Farm. In light of this, we respectfully request that the Examining Authority require the Applicant to explain: 1. Why access through the main residential entrance and curtilage of [redacted] is necessary; 2. Whether the alternative route identified by the Interested Parties has been fully assessed;	The access into the field immediately to the side of the residential property is a permanent right of access used infrequently for inspections and maintenance activities. A further access passing on the road and turning north is for UK Power Networks. UK Power Networks' agent was contacted with the original request on 18 May 2026 regarding the proposed access route change, and a response was received on 27 May 2026 indicating that UK Power Networks could not commit to removing any existing access routes at this stage due to already limited access options. UK Power Networks advised, however, that they would continue to seek internal confirmation. On 17 June 2026, the Applicant contacted UK Power Networks to advise that an alternative access route to PSC3 and PSC4 had been identified via third-party land, with agreement in principle from the landowner. This alternative route would address the welfare and biosecurity concerns previously raised by the Affected Party (AP). NGET requested an update on UK Power Networks' engagement to date with the APs. The Applicant recognises the concern regarding the biosecurity issue and is currently awaiting further information relating to the biosecurity measures and any supplementary feeding requirements at the farm for the cattle and turkey enterprises. This was discussed with the AP's agent at a meeting held on the 11 May 2026. To reiterate the Applicant is keen to continue negotiations and constructive dialogue in order to mitigate the practical implications on the existing agriculture operations to minimise any compensation that may be needed should losses be incurred under the compensation code. NGET clarified that the rights that they require for access is not a temporary construction access route but a permanent access, used infrequently for inspection and maintenance activities once the apparatus is installed. The Applicant has reviewed the alternative permanent access route proposed but this transfers the access route onto another person's land. The Applicant will continue to engage with the AP and the AP of the land affected by the proposed alternative. If voluntary agreements can be reached the Applicant will seek to use the alternative access route for future survey and maintenance requirements (See Additional Detailed Design Request reference ADDR-91 in Appendix F).

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		3.What comparative assessment has been undertaken between the Applicant's route and the alternative route; 4. Why the substantially greater impacts on [redacted] Farm are justified; 5. Why a less harmful alternative has not been adopted.	
REP5-290	Dennis Edward Gosling	I would like to ask National Grid if they can move a pylon's position slightly so that the overhead cables passing over the bottom left hand corner of our garden are far enough away from our wooded area so as not to necessitate cutting any of our trees down.	Positioning of the overhead line in this location is constrained by a number of factors, including gas pipelines, Flood Zone 3, risk of surface water flooding and a proposed solar farm. As a result, the overhead line is limited to its current location and therefore may necessitate some vegetation impact. Further details can be found in Ref Nos 9-8.27 (previous change to move TB202 slightly north out of flood zone) and 9-8.67 (alignment change request) of 5.1 Consultation Report [APP-066] . However, note the Applicant's commitment in 7.2 Code of Construction Practice [Revision F] B08: ' <i>All hedgerows, shrubs, trees or dense vegetation will be retained as far as is practicable</i> '.
REP5-240	Environment Agency	The Environment Agency welcomes the inclusion of GH08 in the code of construction practice primarily to address any potential concerns regarding unexpected contamination. Whilst we do not routinely comment on acid soils, the Code of Construction Practice commitment appears sufficient to address any concerns.	Noted. 5.9.15 Signed Statement of Common Ground – Environment Agency [Revision E] presents the Environment Agency's satisfaction with the 7.2 Code of Construction Practice [Revision F] .
REP5-241	Essex County Council	8.16 Health and Wellbeing and Socio economics, Recreation and Tourism Technical Note (Final Issue A) [REP4-317] 3.3. The technical note reviews 2019 and 2025 IMD change along the route of the project and concludes that the release of the 2025 data does not materially alter the sensitivity or assessment outcomes. In section 3.2.1, the Applicant notes that data indicates relative increase in deprivation for parts of Braintree which may require targeted consideration of potential health impacts (especially in relation to community resilience). ECC is disappointed that the Applicant does not have any recommendations to address this impacts.	The Applicant notes Essex County Council's response. Paragraphs 3.2.1 and 3.2.2 of 8.16 Health and Wellbeing and Socio economics, Recreation and Tourism Technical Note [REP4-317] highlight that although there may be relative increases in deprivation in parts of Braintree which may highlight greater vulnerability among local populations, it also notes that the overall pattern of deprivation along the Project has remained broadly consistent, and changes in IMD rankings are largely a function of methodological adjustments and boundary revisions rather than dramatic shifts in underlying living conditions. Good practice measures already identified in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B] and associated documents such as 7.2 Outline Code of Construction Practice [Revision F] are considered sufficient to address potential impacts identified, which are not significant (for example, these include preparation of a detailed communication strategy to inform communities of construction activities and the preparation of a detailed complaints procedure).
REP5-241	Essex County Council	8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England (Final Issue A) [REP4-307] 3.4. ECC considers that this letter echoes similar concerns to which ECC have expressed. It is noted that Natural England questions the narrow desk study focus on barbastelle, and so it is queried whether they also have concerns on the narrow survey focus on barbastelle. Also, the following statement within this submission suggests that Natural England may also consider that there could be cause for roost resource compensation beyond just those roost trees that are confirmed by survey. Commentary on this would be welcomed accordingly.	As detailed in BIO 2.5 of 8.9.2 Applicant's Response to Second Written Questions [REP5-211], the draft licence applications are based on the design and survey information available at the point of submission of the Development Consent Order application. The outstanding matters outlined within the advice letter on bats from Natural England primarily relate to details which will be confirmed through the detailed design stage, pre-commencement surveys and detailed construction programme which will only be known post consent. For example, additional details relating to roost resource will be obtained through the pre-construction surveys and will be provided to Natural England within the final licence application. An updated impact assessment will be undertaken following the completion of the pre-construction surveys and detailed design. Should compensation be required, details will be provided

Examination Library ID	Name	Matter	Applicant's Comment
		<i>“As raised previously, Table 5.1 of the Method Statement details the proposed compensation for any losses of confirmed roosts. The table demonstrates that for low conservation status roosts of common pipistrelle, soprano pipistrelle, Nathusius’ pipistrelle, Brandt’s, Daubenton’s, Natterer’s, serotine, noctule, Leisler’s and brown long-eared, and where a tree is identified as a roost for one roost type and one species, replacement roosts may not be required. As highlighted Natural England are concerned this may impact on the Favourable Conservation Status of the species in question. Whilst the figure 6 provided demonstrates the areas of woodland or groups of trees subject to direct impacts, it is not currently understood what resource each of these areas presents, and therefore situations where this approach might be necessary; given this Natural England would recommend a more detailed breakdown of these areas once the updated surveys have been completed. This will enable Natural England to understand the resource overall, we would recommend a breakdown of the trees’ roosting potential, with number of lost and retained trees.”</i>	within the final licence application, ensuring that there is no impact to Favourable Conservation Status. The Applicant confirms that all outstanding matters identified by Natural England, can and will be addressed within the final licence application, with no significant change to the mitigation principles agreed during the draft licensing process.
REP5-241	Essex County Council	7.4 Errata Outline Landscape and Ecological Management Plan Appendix A – Arboricultural Impact Plan Part 1 and 2 (Final Issue B) [REP4-176/ REP4-177] 3.5. ECC continues to be disappointed regarding the lack of amendments identified which would strengthen delivery mechanisms, secure alignment with the Essex Local Nature Recovery Strategy (LNRS), or address the adequacy of the 5-year management period as raised in the Statement of Common Ground. The Applicant continues to rely on high-level outline documents and post-consent discharge, without sufficient certainty as to outcomes, monitoring, or long-term stewardship. ECC therefore maintains that further Requirements or details within the Management Plan are necessary to ensure GI and Biodiversity Net Gain (BNG) are delivered in a coordinated, effective, and policy-aligned manner over the lifetime of the project. 3.6. ECC notes the submission of the Arboricultural Impacts Plan (Appendix A to the OLEMP). The Plan provides a detailed spatial representation of impacts on trees, hedgerows, and woodland, including identification of features to be removed, retained, managed, or potentially affected. It also identifies constraints such as root protection areas, important hedgerows, and ancient woodland, which are relevant components of Green Infrastructure (GI). 3.7. ECC welcomes the additional clarity this brings. However, the update relates solely to arboricultural matters and does not introduce any changes to the OLEMP or address the overarching approach to GI delivery, monitoring or long-term management previously raised. ECC would refer to it’s response to ExQ2 DCO 2.S11 for further commentary regarding arboricultural matters.	3.5 7.4 Outline Landscape and Ecological Management Plan [Revision F] was updated at Deadline 5 to include greater reference to the alignment of onsite planting proposals with the Local Nature Recovery Strategies (LNRSs). There is also a commitment to consider the LNRSs as a key part of the site selection criteria for BNG and seek to align any offsite planting of trees in relation to the 3:1 commitment, as far as practicable. The Applicant maintains its position on the sufficiency of the five-year aftercare period but has updated Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] which relates to aftercare, to include some additional detail. 3.6 Noted with thanks. 3.7 Please refer to the Applicant’s comments on the Essex County Council response to ExQ2 DCO 2.S11 in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A].

Examination Library ID	Name	Matter	Applicant's Comment
REP5-241	Essex County Council	7.17 Design Approach for Site Specific Infrastructure (DASSI) (Tracked) (Final Issue B) [REP4-184] 3.8. ECC welcomes the integration of landscape, visual and ecological mitigation, and the intention to deliver GI benefits through native planting, hedgerow restoration, and woodland creation, including the use of 'Environmental Areas' as multi-functional spaces intended to deliver landscape mitigation, habitat creation and Biodiversity Net Gain (BNG). The document confirms a minimum of 10% BNG and sets out that these areas will be monitored and managed for a 30-year period through the LEMP, which broadly aligns with the principles set out in the Essex Green Infrastructure Standards and reflects local landscape character. 3.9. The DASSI design principles for the EACN Substation state that the scheme will aim to "maximise green infrastructure links and biodiversity and filter and screen views of new infrastructure". However, ECC considers that the DASSI largely presents GI as landscape mitigation and screening, rather than as a strategic, multifunctional network embedded within the design process. While Environmental Areas provide opportunities for enhancement, the approach does not clearly demonstrate how GI has informed site selection, layout, or connectivity at a wider landscape scale. 3.10. In particular: • The DASSI does not clearly demonstrate how GI provision aligns with or contributes to the LNRS priorities, spatial opportunities, or nature recovery networks. • There is limited evidence of how GI has been used to maximise connectivity between habitats, beyond site-level planting proposals. • The reliance on the outline LEMP and post-consent detailing reduces certainty as to how GI, BNG and wider environmental outcomes will be coordinated across the scheme. 3.11. ECC also notes that the scope for variation within the DASSI is largely limited to landscape mitigation, which reinforces the need to ensure that GI outcomes are clearly defined and secured at the design stage, rather than deferred.	3.8 The Applicant notes the Council's comment with regard to the integrated approach in the Environmental Areas. 3.9 The Council is correct that the main function for the planting in the East Anglia Connection Node (EACN) is to provide landscape mitigation and screening. Nevertheless, the landscape and ecology teams have worked together to create a planting scheme that is integrated into the landscape, connects areas of habitat beyond the Order Limits and delivers a net gain in biodiversity that is aligned to the Local Nature Recovery Strategy (LNRS). 3.10 With respect to the planting around the EACN, if the sole function of the planting had been to provide landscape mitigation, then the planting would have comprised tree and shrub planting only. However, as illustrated in 7.4 Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals [Revision C] the aim of the planting is to create a range of habitats to provide benefits to biodiversity in keeping with the LNRS. These include wetlands, grassland, individual trees and scrub habitats. The plan also shows the areas of retained habitat. The landscape plans referred to above do not illustrate how the planting is linked to habitat beyond, but an integrated approach has been taken in the design to link the planting to areas of semi-natural habitat beyond the Order Limits including the hedgerow network and the blocks of woodland. The Applicant considers that 7.4 Outline Landscape and Ecological Management Plan [Revision F] is the appropriate mechanism to ensuring that an integrated approach is taken with respect to landscape and ecology. 3.11 The habitats that would be temporarily removed by the Project would be re-instated with no lasting effect on the existing green infrastructure. These habitats are to be returned to landowners. The areas of land that are to remain in the control of the Applicant are the Environmental Areas. The plans for the habitat creation in these areas have been provided in 7.4 Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals [APP-325] as amended in 7.4 Outline Landscape and Ecological Management Plan Appendix D – Outline Landscape Proposals [Revision C]. These plans have integrated landscape and ecology so that the plans deliver landscape mitigation and create habitats of benefit to biodiversity that are connected to retained habitats in the wider landscape.
REP5-241	Essex County Council	6.8.A1 & A16 Environment Statement Figure A8 3.12. ECC welcomes the provision of a comprehensive ecological baseline, including the UK Habitat Map and figures showing statutory and non-statutory designated sites. These demonstrate that the scheme is located within a densely connected ecological network, including internationally designated SPA and Ramsar sites along the Essex coast, alongside numerous nationally designated SACs, SSSIs and Local Nature Reserves.	3.12, 3.13 The Applicant notes the Council's comment with respect to location of the Project and its potential to inform ground investigation and Biodiversity Net Gain (BNG). 3.14 The first stage in delivering a BNG is to deliver no net loss to biodiversity. On this Project this is would be achieved through replacement planting for the habitats temporarily impacted by the Project and enhancements of retained habitats. A net gain in biodiversity is to be achieved through the landscape planting within the Environmental Areas and purchasing off-site biodiversity units. The planting in the Environmental Areas has the dual purpose of delivering landscape mitigation and habitat units to deliver a net gain in biodiversity. The habitats have been designed to provide habitat connectivity across the landscape and took account of the priorities in the Local Nature

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		3.13. This baseline has the potential to inform the delivery of GI, BNG and alignment with the Essex LNRS, including its priorities and opportunity areas. 3.14. ECC recommends that the Applicant provides a clear, integrated explanation of how the ecological baseline, GI proposals, BNG delivery and LNRS priorities are aligned, supported by spatial mapping where appropriate. This remains under discussion through the Statement of Common Ground.	Recovery Strategy. The habitats that are to be removed to create the Environmental Areas were arable and of minimal value to biodiversity or grassland habitats that would be enhanced.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] 3.15. ECC has reviewed the Public Rights of Way Management Plan and provides the following commentary: 3.16. When referring to the Public Right of Way, the acronym should be PRow as opposed to “ProW.”	3.16 - The Applicant notes the comment and can confirm that one typographical error making use of ‘ProW’, as opposed to ‘PRow’, is contained within paragraph 1.4.7 of 7.6 Outline Public Rights of Way Management Plan [REP4-178] and that this has continued through into 7.6 Outline Public Rights of Way Management Plan [REP5-163]. However, in the context of the paragraph, the typographical error does not impact on the understanding, or meaning, of the associated text. The typographical error will be corrected at Deadline 7.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] 3. PRow Management Regimes - Temporary Closure (managed) 3.17. Paragraph 3.1.3 - "... Management would also include the contractor pausing construction activities to allow safe passage of PRow users, or the use of physical measures, such as fencing and gates, ‘traffic light’ systems, or direction by contractor’s staff to manage the interaction between construction activities and PRow users.” Any gates on the PRow itself must be agreed with the Local Highway Authority and only used in high risk locations. In respect of the same paragraph, ECC would also question the definition of “short period,” and whether this waiting time will be longer than 15 minutes – clarity must be provided on this to avoid unreasonable delay on the PRow network.	3.17 - The Applicant notes the comment regarding paragraph 3.1.3 and would refer Essex County Council to paragraphs 4.2.2, 4.2.3, 4.2.16 and 4.2.17 of 7.6 Outline Public Rights of Way Management Plan [REP5-163], which refer to arrangements and the detail of measures being subject to discussion with PRow Officers at the relevant Local Highway Authorities. With regard to the definition of ‘short period’ within the last sentence of paragraph 3.1.3, as referenced and carried through to 7.6 Outline Public Rights of Way Management Plan [REP5-163], the Applicant expects this will be no longer than 15 minutes but it should be noted the actual period of waiting will vary depending upon the construction activities taking place. Additional text will be added to the paragraph at Deadline 7 to note that the short period of waiting is expected to be no longer than 15 minutes.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] Table 3.1 Typical interaction management regimes 3.18. As noted above, regarding paragraph 3.1.3 of the Plan, gates on the PRow itself must be agreed with the Local Highway Authority and only used in high risk locations. 3.19. Regarding the crossing of temporary haul road within table 3.1 – “During construction of the Project, crossings of haul roads will be managed using appropriate access controls, which may include gated access of the PRow or the haul road, or other appropriate measures. However, at such crossing points, PRow users may have to wait for a few minutes, whilst the haul road is in use by the construction team.” ECC requests that the Applicant details what is considered by “a few.” 3.20. Furthermore, in the same row of table 3.1 as above and in respect of “Signage will be provided to warn PRow users and drivers of construction traffic of the interface between construction traffic and the PRow and may be supported by	3.18 - With regard to gates on the Public Rights of Way (PRow) the Applicant would refer Essex County Council to the response to comment 3.17 regarding paragraph 3.1.3 above. 3.19 - With regard to what is considered to be ‘a few minutes’, the Applicant expects this will be no longer than five minutes but it should be noted that the actual period of waiting will vary depending upon traffic flows on the haul road. Additional text will be added to the paragraph at Deadline 7 to note that the period of waiting is expected to be no longer than five minutes. 3.20 - With regard to the provision of speed limits on haul roads and driver protocols at locations where PRow cross them, the Applicant would refer Essex County Council to 7.3 Outline Construction Traffic Management Plan [Revision E] paragraphs 5.4.25, 5.7.9 and 6.2.10 to 6.2.16 regarding haul road signage, haul road speed limits and the driver information pack respectively, as well as paragraph 4.2.15 of 7.6 Outline Public Rights of Way Management Plan [REP5-163] which states such areas would be subject to a nominal 5 mph speed limit. Notwithstanding the above the text ‘may be supported by <i>appropriate speed limits</i>’ will be changed to ‘<i>will be supported by appropriate speed limits</i>’ at Deadline 7.

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		appropriate speed limits and driver protocols” – ECC recommends that this should be reworded to: Signage will be provided to warn PRow users and drivers of construction traffic of the interface between construction traffic and the PRow and will be supported by appropriate speed limits and driver protocols. This amend would offer greater certainty on this point. 3.21. Regarding shared routes and temporary closure (managed) – ECC requests that the Applicant defines the speed that drivers will be instructed to slow down to in the affected area when haul routes and PRow follow the same alignments. 3.22. Regarding overhead conductor stringing and temporary closure (managed) - ECC requests that the Applicant defines the period of time that PRow users will be notified of any temporary closures – eg one month in advance of the temporary closure.	3.21 - With regard to speed limits on shared routes, the Applicant would refer Essex County Council to paragraph 4.2.15 of 7.6 Outline Public Rights of Way Management Plan [REP5-163] which states such areas would be subject to a nominal 5 mph speed limit. Notwithstanding this, text will be added in the shared routes section of Table 3.1 at Deadline 7 to note the nominal speed limit for construction traffic of 5mph. 3.22 - The Applicant notes the comment requesting the period-of-time for advance notification of Temporary Closure (Managed) regimes and would confirm that this can be agreed between the Main Works Contractor and the Local Highway Authority during production of the final PRow Management Plan, once the Contractor's method of working and programme has been determined. Notwithstanding the above text will be added at Deadline 7 to note indicative timescales and that these will be agreed between the Main Works Contractor and the LHA Prow Officer.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] 4.2 Management Measures – Signage 3.23. In respect of signage, paragraph 4.2.8 puts forward the following wording for both the advance warning and any no entry signage: “All Public Rights of Way shown in green will remain open. There may be a requirement to temporarily control access, however you will be able to pass on the understanding that your use is restricted to the Right of Way only, please do not stray into the wider area whilst using these routes.” ECC considers that this wording is slightly inflammatory and suggests removal and replacement with wording that points out that walkers should stick to the paths for safety. 3.24. In respect of contact details within the signage, ECC would welcome that at each location there will be local site supervisor contact details for local concerns rather than a main Info@ type of email address. This would provide better comfort that concerns would be addressed by a relevant and local contact as opposed to a generic contact. 3.25. At paragraph 4.2.10 – “Where a PRow crosses a temporary access track or haul road, a system of signs informing PRow users of the construction activity would be put in place, together with signs warning drivers of construction vehicles of the likely presence of PRow users. Such arrangements could be comparable to an uncontrolled crossing of a road, supported by low vehicle speeds driver protocols.” ECC requests clarity as to what will be placed at permanent haul roads. Furthermore, ECC requests clarity and definition regarding what the “low vehicle speeds” will be. 3.26. At paragraph 4.2.11, ECC would recommend that signs must be inspected at least weekly, at present the paragraph simply notes that the inspections will be carried out “regularly” which is considered to be too vague.	3.23 - The Applicant notes the comment. Wording needs to ensure that Public Right of Way (PRow) users are aware that access is restricted to the PRow only and to reinforce the earlier element of proposed wording that states restrictions are to ensure the health and safety of both PRow users and those undertaking the works. Paragraph 4.2.8, as referenced in the comment and carried through to 7.6 Outline Public Rights of Way Management Plan [REP5-163], notes that arrangements will be discussed and agreed with the relevant Local Highway Authority (LHA) PRow Officer prior to installation. Notwithstanding this the suggested wording for signage will be amended at Deadline 7. 3.24 - The Applicant notes the comment and would confirm that this can be agreed between the Main Works Contractor and the LHA during the discussion and agreement prior to installation, as noted in paragraph 4.2.8 of 7.6 Outline Public Rights of Way Management Plan [REP5-163]. 3.25 - The Applicant notes the comments and assumes they relate to the proposed new permanent private access to the East Anglia Connection Node (EACN) between Ardleigh Road and Bentley Road. This access would be subject to the same measures as temporary haul roads during construction of the EACN but, once the Project's construction works have been completed, traffic levels would drop to around five LGV and three HGV movements per month, allowing the temporary measures to be removed. The permanent crossing would then have facilities and measures as developed in consultation with the LHA PRow Officer during the detailed design phase, as first indicated in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. Notwithstanding this clarity will be added to paragraph 7.7.3 of 7.6 Outline Public Rights of Way Management Plan [REP5-163] to note that during construction, management measures will match those for haul roads. In relation to speed limits the Applicant would refer Essex County Council to the response to comment 3.20 above. Notwithstanding this text will be added at Deadline 7 to clarify the nominal construction traffic vehicle speed of 5 mph. 3.26 - The Applicant notes the comment regarding the frequency of signage inspections and would confirm that the inspection period will be amended at Deadline 7 to ‘<i>at least weekly</i>’.

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		3.27. At paragraph 4.2.14, ECC considers that this implies that a PRow could be reinstated on a different alignment if the highway authority and landowner agree “or” a permanent diversion. That is not the case as PRow can only legally be moved by means of a legal order, or, in this case, the Applicant specifically exercising their DCO powers to permanently divert a PRow. The paragraph must be amended by removing the word “or” within this paragraph.	3.27 - The Applicant notes the comment, is aware of the legal requirements and disagrees with Essex County Council's interpretation. The text referenced, which has been carried through to 7.6 Outline Public Rights of Way Management Plan [REP5-163], clearly states that PRow's ‘<i>will be returned to their previous alignment and condition unless agreement has been reached with the LHA and landowners or where the project proposes to permanently divert a PRow</i>’. The paragraph, as written, is intended to allow for LHAs to request retention of temporary PRow diversions as permanent features, subject to the relevant landowner agreements, legal process and Order, whilst the inclusion of the word ‘or’ and the subsequent text is necessary to recognise that the Development Consent Order, if approved, will include powers to permanently divert a small number of PRow's, as detailed within Schedule 7 of 3.1 Draft Development Consent Order [Revision F] and 7.6 Outline Public Rights of Way Management Plan [REP5-163].
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] Management of ‘Shared Routes’ and PRow Crossings 3.28. At paragraph 4.2.16, the arrangements for demarcated routes to be discussed with the relevant PRow Officers must include discussion of appropriate widths for routes when separation or demarcation is needed.	3.28 - The Applicant confirms that paragraph 4.2.16, as referenced and carried through to 7.6 Outline Public Rights of Way Management Plan [REP5-163], states arrangements, which are assumed to include widths, will be discussed with the relevant Public Right of Way (PRow) Officers but would also refer Essex County Council to paragraph 5.1.2 of 7.6 Outline Public Rights of Way Management Plan [REP5-163] which includes information regarding widths provided by Local Highway Authority PRow Officers. Notwithstanding this, text will be added to paragraph 4.2.16 at Deadline 7 to include reference to paragraph 5.1.2.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] Management of Short Period Closures 3.29. At paragraph 4.2.18, it states that PRow users may have to wait for a short period of time whilst the construction team complete or pause their task – ECC questions what is considered to be a short period of time and recommends that this is defined appropriately. 3.30. At paragraph 4.2.21, it is stated that National Grid will inform the relevant Local Highway Authority PRow Officer in advance of the need for any short-term closures, ECC would recommend that it would also be useful for the relevant parish authorities to also be notified in a similar manner.	3.29 - With regard to the definition of ‘short period of time’ within paragraph 4.2.18, as referenced and carried through to 7.6 Outline Public Rights of Way Management Plan [REP5-163], the Applicant expects this will be no longer than 15 minutes but it should be noted the actual period of waiting will vary depending upon the construction activities taking place. Notwithstanding this, text will be added at Deadline 7 to note that the short period of waiting is expected to be no longer than 15 minutes. 3.30 - The Applicant notes the comment and provided clarity as to whether parish authorities would be notified of short-term closures in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299] within a reply to a comment from Holton Parish Council to DCO 1.A24. That response confirms that advance notice of any temporary restrictions will be provided in accordance with the arrangements set out in the 7.6 Outline Public Rights of Way Management Plan [REP5-163] and the 7.2 Outline Code of Construction Practice [Revision F], including its 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision C]. This will include on-site signage and wider community engagement as well as updates via the Project website, letter drops, emails and dedicated community liaison channels to the Local Highway Authorities and Parish Councils. Notwithstanding this text will be added to paragrph 4.2.21 to include the parish authorities.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] Temporary Closure and Diversion	3.31 - The Applicant notes the comment requesting the period-of-time for advance notification of Temporary Closure and Diversion and would confirm that this can be agreed between the Main Works Contractor and the Local Highway Authority during production of the final PRow Management Plan,

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		3.31. In respect of paragraph 4.2.27, the notification period of the relevant Local Highway Authority PRow Officer in advance of any closures or diversions being implemented should be defined. 3.32. Paragraph 4.2.29 states that “Where National Grid has sought and obtained the consent of the relevant LHA authority for additional temporary diversions (beyond those identified in Section 87 of this document and Schedule 8 of the draft DCO), it will inform the relevant PRow officer at least seven days in advance of the start of any agreed closure and notify them when the closure has ceased” – ECC recommends that this should be at least 14 days as opposed 7 days to allow for appropriate consideration and communication.	once the Contractor’s method of working and programme has been determined. Notwithstanding the above text will be added at Deadline 7 to note indicative timescales and that these will be agreed between the Main Works Contractor and the LHA Prow Officer. 3.32 - The Applicant notes the comment regarding an extended notification period and would confirm that this can be agreed between the Main Works Contractor and the Local Highway Authority during production of the final PRow Management Plan, once the Contractor’s method of working and programme has been determined. Notwithstanding this text will be added at Deadline 7 to note ECC’s preferred period of 14 days.
REP5-241	Essex County Council	7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178] 5.6 Inspections 3.33. In respect of paragraph 5.6.1, ECC requests clarity is provided as to how often site checks will carried out across the Project to monitor compliance with the final PRow Management Plan – at present this is noted as “regular” which is considered to be too vague to offer the Local Highway Authority assurance of proper monitoring. 3.34. ECC would request a section is included within this Management Plan regarding maintenance of the PRow or their temporary diversion routes within the Order limits. A simple vegetation cutting regime by the Main Works Contractor will have significant benefit to users and keep complaints down for example. Any damage to the surface of temporary routes also needs to be addressed during the construction to ensure users are safe and accessible. 3.35. ECC would also request consideration that where Local Highway Authority PRow Officer raises issues with a PRow or temporary diversion route within the order limit, the concerns will be addressed, and where applicable, undertake maintenance of the routes within 14days of notification from the Officer.	3.33 - The Applicant notes the comment regarding the frequency of site checks and will amend the frequency to ‘<i>at least weekly</i>’ in line with the response to item 3.26 above. 3.34 - The Applicant notes the comment and would refer Essex County Council to paragraphs 5.3.2 and 5.4.1 of 7.6 Outline Public Rights of Way Management Plan [REP5-163] which note that widths of PRow to be maintained during the Project’s construction will be agreed with LHA PRow Officers during pre-commencement condition surveys and that strengthened surfaces would be provided where necessary. Notwithstanding ny additional text covering ongoing maintenance of permanent or temporary PRowWs, in relation to vegetation growth, widths and surfacing, will be added at Deadline 7 to paragraph 5.6.2. 3.35 - The Applicant notes the comment and would refer Essex County Council to 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision C] which contains details of ways issues can be raised and Sections 5.6 and 5.7 of 7.6 Outline Public Rights of Way Management Plan [REP5-163], which contain details of the inspections regime and non-compliance procedure. Notwithstanding this, any additional text will be added to paragraph 5.6.3 at Deadline 7 to note a 14day time period for addressing issues identified during inspections or raised by the LHA PRow Officer.
REP5-241	Essex County Council	8.9.1.3 Additional Visuals for ExQ1 - HE1.13 (Final Issue A) [REP4-309] 3.36. ECC considers that whilst the provision of the Photomontages are useful, the wirelines provided for RVAA only represent 3D form of the Project with only some topographical information, there is no context of these within the existing views and therefore provide very little in terms of representing appropriate views.	The visualisations set out in 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 – Part 1 [REP5-205], Part 2 [REP5-206], Part 3 [REP5-207] and Part 4 [REP5-208] provide a series of computer generated visualisations to supplement and provide further context to the wireline visualisations presented in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134]. 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. Trees and hedgerows were 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.

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REP5-241	Essex County Council	7.12 Visualisations - Part 4 (Final Issue B) [REP4-180] 3.37. ECC does not consider it appropriate to take photography from behind a temporary visual obstruction.	The Applicant notes that in 7.12 Visualisations – Part 9 [REP4-182] only one view direction is shown. The revised visualisation ‘Figure: 7.12.F109_VP4.11g (Rev B)’, of Viewpoint 4.11 PRoW south of Aldham (Aldham 15) was submitted at Deadline 4 in line with 8.1 Errata List [REP4-185] to make a correction to Figure: 7.12.F109_VP4.11g (7.12 Visualisation – Part 4 of 9 [APP-346]) to show an existing wood pole line which was incorrectly removed on the submitted visualisation. The remaining figures that form part of the pack of visualisations for Viewpoint 4.11 remain as per pages 86 to 89 of 7.12 Visualisation – Part 4 of 9 [APP-346]. Figure: 7.12.F109_VP4.11g (Rev B) has been uploaded to the Planning Inspectorate Document Library under 7.12 Visualisations - Part 4 [REP4-180]. Other view directions from Viewpoint 4.11: PRoW south of Aldham (Aldham 15) illustrate open views to the north-east, east and south-east.
REP5-241	Essex County Council	7.12 Visualisations - Part 9 (Final Issue B) [REP4-182] 3.38. ECC considers that this does not represent the worst-case scenario where the viewpoint photography is taken along the Project which is misleading where background structures are obstructed by one single pylon.	The Applicant notes that in 7.12 Visualisations – Part 9 [REP4-182] only one view direction is shown. The revised visualisation ‘Figure: 7.12.F247_HE37c (Rev B)’, of Viewpoint HE37: Feeringbury Manor Barn, Braintree was submitted at Deadline 4 in line with 8.1 Errata List [REP4-185] to make a correction to Figure: 7.12.F247_HE37c (7.12 Visualisation – Part 9 of 9 [APP-351]) to remove an existing 33 kV overhead line section on the submitted visualisation proposed to be removed as mitigation. The remaining figures that form part of the pack of visualisations for Viewpoint HE37 remain as per pages 88 to 91 of 7.12 Visualisation – Part 9 of 9 [APP-351]. Figure: 7.12.F247_HE37c (Rev B) has been uploaded to the Planning Inspectorate Document Library under 7.12 Visualisations – Part 9 [REP4-182].
REP5-241	Essex County Council	4. Ecology and Landscape Working Group 4.1. Following discussion amongst local authorities and the relevant wildlife trusts, the need for a single Ecology Advisory Group (or similar) moving forward has been identified. 4.2. ECC supports the establishment of an EWG has been expressed by Suffolk County Council and Babergh and Mid Suffolk District Councils in their joint Local Impact Report, as well as Norfolk Wildlife Trust in their Written Representations. 4.3. ECC would support this request and the expansion of the Groups scope to include Landscape matters. It would also support the draft DCO Requirement for an Ecology and Landscape Working Group for Norwich to Tilbury. This is attached as Appendix 4 [Applicant note: full wording not replicated here, please see Appendix 4 of REP5-241]	4.1 The Applicant notes the Council’s acknowledgment that a single working group should be set up. 4.2 The Applicant notes the Council’s support for an Ecology Working Group. 4.3 The Applicant notes the request to include landscape matters; at this time the remit of the group is to cover ecological matters only as identified in 7.4 Outline Landscape and Ecological Management Plan [Revision F].
REP5-243	Essex County Council	Appendix 2 – ECC response to REP4-298	The Applicant has responded to Developers Forum [ID 1] in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A] and Appendix B and C of this document.

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			The Applicant has responded to comments on Traffic Regulation Orders [ID 2 &3] in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A]. The Applicant has responded to AIL Information and VMS Signs [ID 5] in response to TT 1.20 in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A]. The Applicant notes the comment in ID 6. The Applicant has responded to the Review of Structures [ID 7 & 10] in Appendix C of this document. The Applicant has responded to the comments on Spa Road [ID 11] in Appendix B of this document. The Applicant has responded to comments on Ardleigh Depot [ID 12] in Appendix C of this document. The Applicant has responded to comments on Non-Compliance [ID 13] in Appendix C of this document. The Applicant has responded to Overspill Parking Concerns [ID 17] in Appendix C of this document.
REP5-243	Essex County Council	Appendix 2 [ID 4]	The Applicant held a meeting with Essex County Council on the 3 July 2026, during which Site 48 was raised. The Applicant and ECC are due to meet within two weeks for a further discussion on junction mitigation measures.
REP5-243	Essex County Council	Appendix 2 [ID 8]: It is noted that Junction modelling of Site 48 (A120 Braintree Bypass/A131 Great Notley Bypass) is missing from the list of junctions mitigation measures to be discussed.	The Applicant held a meeting with Essex County Council on the 3 July 2026, during which Site 48 was raised. The Applicant and ECC are due to meet within two weeks for a further discussion on junction mitigation measures.
REP5-243	Essex County Council	Appendix 2 [ID 9] ECC note that the proposal for a mini-bus is to be discussed as part of the mitigation. As previously mentioned (REP3-077), ECC are requiring a mini-bus as a committed measure in the CWTP. ECC do not believe that travel patterns are required to commit to it. A firm commitment to implement a mini-bus(es) is required in the CTMP and as such the proposed wording provided by the Applicant is not acceptable. It is however, reasonable that the details of how the mini-bus will operate will be determined at a later date when the travel patterns of construction workers are understood.	The Applicant has committed in 7.3 Outline Construction Traffic Management Plan [REP5-150] that the Main Works Contractor(s) will explore the feasibility of a mini-bus to site. This provides certainty that the Main Works Contractor(s) will give due consideration to transporting workers to site by mini-bus. The Applicant considers that this commitment aligns with paragraph 5.14.12 of Overarching National Policy Statement for Energy (EN-1), which refers to identifying opportunities to consolidate trips, opportunities for shared mobility and re-moding of travel to a more sustainable mode. Given the linear and mainly rural nature of the Project, the Applicant wishes to ensure that any shared mobility is feasible, operationally reasonable and truly effective. ECC will have the opportunity to feed into this matter further during detailed design and as part of the approval of the final CTMP, to be produced by the Main Works Contractor(s).
REP5-243	Essex County Council	Appendix 2 [ID 15] ECC would require a commitment in the Outline CTMP to: • undertake the site observations and agree the outcomes with ECC prior to construction. • Any agreement following the site observations should be included in the Detailed CTMP produced by the Contractor.	The 7.3 Outline Construction Traffic Management Plan [Revision E] has been updated to reflect the commitments requested by Essex County Council.
REP5-245	Essex Scouts and Guides	Essex Scouts and Guides continue discussions with National Grid but with no firm commitment in place that they will enable the event to relocate, the Trustees must continue to maintain an objection to the scheme.	Negotiations are ongoing with regular correspondence between the Applicant and the party's representatives. The most recent meetings with the party's agent were held on 13 May 2026 and 4 June 2026. A meeting was held with Essex Scout and Guide International on 15 May 2026 with the purpose of

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			discussing their comments on Heads of Terms issued to them. Comments were recorded and taken away by the Applicant who has since issued revised Heads of Terms to the party's agent prior to Compulsory Acquisition Hearing 3 and comments are awaited.
REP5-246	Five Estuaries Offshore Wind Farm Limited	Comments on Deadline 4 submissions Five Estuaries notes that the Applicant has provided an agreed updated version of the Onshore Substations Operational Noise and Outline Noise Complaints Protocol (the Noise Protocol) (see Appendix B.2 of the Interrelationships Report [REP4-296]. Five Estuaries notes a number of concerns raised in their deadline 4 responses by Tendring District Council – [REP4-337] Pages 10 to 13 and Essex County Council [REP4-328] Item 4 para 5.11 to 5.13 on the approach proposed through the complaints procedure particularly in relation to the time taken to investigate a breach following a complaint. Five Estuaries notes that the Noise Protocol is an outline document and the draft DCO Requirement requires a final protocol to be submitted to and approved by the discharging authority. The outline is not a document intended to inform the public, it is intended to guide the production of the final protocol which will be submitted. The criticisms made by the Councils that it is too technical are therefore considered to be inappropriate and misconceived. This is not an FAQ for the public, it is a technical control document and it is appropriate that the content reflects that. The final version of the Noise Protocol will include timeframes that are approved by the discharging 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 Noise Protocol will be to identify the method by which a complaint would be investigated. Five Estuaries also notes that the operational noise level limits proposed by the projects are very low; substation noise is unlikely to be audible inside any residential dwelling, and there is no evidence that noise exposure at this level could cause annoyance. Hence, occurrence of complaints regarding normal substation operations are considered extremely unlikely. As compliance with these limits will be a legal requirement ensured through the substation design process, the noise should only exceed its limits if a fault has developed in one or more items of plant. Section 6.4 of the Noise Protocol identifies that the first stage in the process would be to undertake a site walkaround to identify any equipment operating incorrectly, within 48 hours of receipt of a complaint. All three substations will be unmanned; hence this timeframe is the minimum that would be achievable. It is considered extremely likely that the initial site walkaround would identify any equipment faults, and Section 6.5 of the Noise	The Applicant agrees with the comments made by Five Estuaries in response to Tendring District Council's and Essex County Council's Deadline 4 submissions on the Outline Noise Protocol.

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		Protocol states that initial remedial measures must be considered. Therefore, the likely timeframe for resolution of the issue would depend on how quickly it can be fixed, without the need to resort to the measurement protocol and associated timeframes. The alternative scenario is much less likely, i.e. in the case that the complainant has detected a fault with the plant that the site walkaround could not identify. For the fault to be undetectable by a site operative, it would need to be a very small breach of the consented noise level and therefore unlikely to cause an unreasonable disturbance. This is the only scenario under which the measurement procedures and timeframes described in Section 6.6 of the Noise Protocol [Appendix B.2 of the Interrelationships Report [REP4-296]] are considered likely to apply. The timeframes identified in Section 6.6 of the Noise Protocol recognise the likely technical complexity of such a scenario and the high degree of individual expertise and equipment precision required to undertake such an investigation. Such resources are of limited availability; hence there can be delays to mobilisation. Following appointment, surveys must only be undertaken when weather conditions are appropriate, so undertaking them at short notice can be challenging in a variable climate such as the UK. The identified timeframes are based on extensive professional experience of how long these activities take; for example, cost-benefit analysis of mitigation options requires information from equipment and mitigation suppliers and the timeframe for providing this is outside of the operator's control. However, these timeframes are the expected maximum and every effort will be made to expedite the process. It may be possible to complete the work quicker than specified when resources are available and weather conditions are appropriate. Five Estuaries note that there is currently no Institute of Acoustics good practice guide for substations, however comparing the time periods against the Good Practice Guide <i>[Applicant Note: please see original REP5-246 for hyperlink – it has not replicated in this document]</i> for onshore wind turbines¹, 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. It is therefore not accepted that the drafting or the timescales of the outline protocol are not suitable as has been asserted by the Councils. Rather, Five Estuaries maintains that the outline protocol follows suitable available guidance (there being none specific to co-located substations), and provides shorter timescales for the operators to respond than the timescales set out in that guidance.	

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REP5-248	Gent Fairhead and Co Limited	Our concern relates to the alignment and Pylon/Tower placement location as currently proposed by the Norwich to Tilbury Grid upgrade scheme. The location at Monks Farm relates to Towers/Pylons TB84, TB85 and TB86. We would respectfully request that TB85 particularly is relocated approximately 200metres southwards from its currently shown position. In doing so TB85 will remain within the Draft Order Limits. If TB85 is relocated in this way then significant amounts of sand and gravel will no longer be sterilised.	The need to respond to the potential minerals extraction had led to the identification of a scenario here to respond to uncertainty. A further development proposal has then subsequently been brought to the Applicant's attention. The housing and extraction developments each favour a different outcome. The Applicant have been in discussion with both parties and understand they are in discussion with each other. We continue to engage to establish a preferred position which may well provide a middle ground. At this stage we note the Affected Party's preference and will continue to liaise with them to determine the preferred solution.
REP5-291	George Nicholas Jones	1. NG have responded inadequately on the alignment change request between the A1060 and A414 to move TB166 and TB167 to the east and mitigate impact on a listed building and listed lane and save construction and compensation costs. NG have not providing a reasoned or substantiated explanation of their conclusion that 'the alignment requested by the respondent is not preferred either technically nor environmentally'. This appears a subjective self interested conclusion driven by adverse cost, procedural and program implication for NG as they did not engage when they should have done 2 years ago. There are constraints but none that have been shown to prevent realignment even between TB165 and TB168 so just moving 166 and 167 within the respondent's ownership. 2. No response or explanation has been provided to justify building over ground in the green belt.	The Applicant recently met with the landowner and their agent at their property on 8 June 2026 to discuss the landowners concerns regarding the project. The landowner has two proposed pylons on their land and is seeking to have one pylon moved to an adjacent field. The Applicant also discussed the landowners preferred accommodation works and ways to mitigate the impacts. In considering the alternative pylon positions and route proposed, our engineering team have to consider not just the pylon footprint but also the construction area working requirements, necessary stand offs to the gas pipeline and must ensure there is necessary flexibility to respond to the findings of ground investigations to ensure the line can be built. There may well be individual locations where a pylon could be built, but the Applicant's position is that there are too many restrictions imposed by those interactions with the gas pipeline to provide the necessary certainty of delivery. We also have to be cognisant of the fact that movement from one location does not mean all effects go away. It typically leads to a transfer of effects to some other group of receptors. So, whilst one landowner may prefer an alternative that reduces the effects as they perceive them, the Applicant must consider how effects may then increase for those with interests or affected by that alternative. In this case the suggested movement would pass more centrally through the grounds of ARU Writtle and be much closer to residential properties than is the case for that being taken forwards. We would also expect there to be a requirement for a greater amount of tree clearance on the proposed alternative without introducing additional angle pylons. So whilst noting the perceived benefit to the requestor of the change, the Applicant's position is that the alternative is less preferred.
REP5-292	Gillian Ann Whittle	Comments on NG's responses on PEA Appendix I – Heritage [redacted] Farm [REP3-137] [redacted] Farm is definitely a three-storey building. NG's ignorance in simply looking at the description by Historic England is not believable, especially as it then goes on to state that "this assessment has been informed by site visits and aerial and street-view imagery." If NG has done a site visit and looked at aerial and street-view imagery, then surely it can see that [redacted] Farm is three storeys high and not two. Failure by NG to do the job properly and deliberate down-playing of the true situation to suit NG's needs.	The Applicant does not agree with the characterisation of effects portrayed by the respondent which appear to equate any visibility with 'a disastrous effect', nor do we agree that pylons at approximately 240 m would 'loom over' the property. The Applicant disagrees and has set out its assessment within the Environmental Statement. The Applicant notes that the Holford Rules, amongst other factors, are used to inform decision making, and that in practical terms it is not possible to be compliant with all the Holford Rules, and a balance needs to be achieved. With regard to operational noise, these matters have been addressed in previous responses. To clarify, the property in question represents the closest receptor to the proposed East Anglia Connection Node (EACN) substation and is therefore identified as the worst-case receptor relative to other nearby

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		Once again, we would repeat that, although NG states that the Asset, [redacted] Farm, is “screened from view by a well-established hedge that lines the road,” this is categorically not the case. The scrubby and badly maintained (by the current owner of the farmland opposite the Asset) hedge will clearly be grubbed out by NG. Any replacement hedge will not in any adequate way hide four 50m high pylons. The owners’ long-established hedge is 1m tall rising to 1.7m tall. Again, entirely inadequate to shield against 50m pylons. There are four trees in the front garden, one of which needs to be removed as it is dead, and, once again, these trees are entirely inadequate in reducing the impact of the pylons. The Applicant states that “the tops of pylons TB1, TB2, TB3 and TB4 may be visible over the top of mature tree cover to the south.” Again, deliberate down-playing by the Applicant – it is obvious to anyone that the pylons will without doubt be visible over the top of mature cover. These pylons would be 50m tall, and to suggest that they may simply be visible is drastic understatement. In fact NG effectively goes on to admit this, as it then states that “additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting.” The Heritage Asset, [redacted] Farm, is, put quite simply, too close to NG’s proposed substation or, put even more simply, NG should not be building their proposed substation so close to this Heritage Asset. NG states that “adverse effects from operational noise are not expected at [redacted] Farm.” However, in its Volume 6 Environmental Statement, 14.7 Operational Noise Assessment, 14.7.5, NG refers to the Heritage Asset [redacted] arm as “the worst affected receptor R.10 [redacted] Farm.” It goes on to state that “the context is a relatively low specific noise level in a rural area, above existing average levels of ambient noise during night-time periods (36dB LAeq, 16h)” and “the specific noise level marginally exceeds the SOAEL during daytime and night-time periods. Outcome – likely significant effect.” Once again, deliberate downplaying and failure to represent the truth by NG about its disastrous impact on a Grade 2 Heritage Asset. The Applicant goes on to state that “through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment including listed buildings.” There is a simple answer to this – No, it has not. Not only will the Grade 2 Heritage Asset, [redacted] Farm, be severely impacted, but close by the Grade 2 Heritage Asset, Hungerdowns (no. 1112091) will also be impacted. NG also states that “during construction and operation phases this Asset will experience a temporary, during construction and permanent during operation, moderate adverse significance of effect” and “a mid-less than substantial harm.” Once again	receptors. This does not, however, indicate the presence of an adverse or significant adverse effect. The reference to a likely significant effect relates to the unmitigated scenario presented in Table A14.3.5 of 6.14.A3 EACN Substation Operational Noise Assessment [APP-259]. The mitigated scenario, as set out in Table A14.3.9, demonstrates that effects would not be significant. Operational noise mitigation measures are secured through commitment NV21 of 7.2 Outline Code of Construction Practice [Revision F], and operational noise limits are secured by Requirement 14 of the 3.1 Draft Development Consent Order [Revision F]. Regarding the heritage matter, this has previously been considered and addressed in 8.5.8 Applicant’s Response to Issue Specific Hearing 2 Action Points [REP4-303]. As set out in that response, the description of Bounds Farmhouse as two storeys reflects the official listing description held by Historic England, which identifies the building as two storeys with attics. In heritage terms, and as a domestic residence without a designed view, this distinction does not alter the assessment of the asset’s significance or its setting, nor does it affect the assessment of effects. The assessment of the asset, including the contribution of its setting and the effects of the Project, is set out in the Environmental Statement, where Bounds Farmhouse is assessed as experiencing a moderate adverse significance of effect and Mid Less Than Substantial Harm (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision C] and 6.11.A7 Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215]). The Applicant has reviewed the comments and does not consider that the points raised materially affect the conclusions of the assessment, and therefore maintains the position set out in the Environmental Statement and subsequent submissions. The Applicant has been in regular contact with the AP’s agent and confirmed the position regarding voluntary negotiations and land acquisition via email on 8th June 2026. This confirmed that the Applicant is not seeking to progress negotiations for voluntary agreement on the AP’s holding. The AP remains an interested party in 4.3 Book of Reference [Revision E]. The Applicant refutes the allegations and confirms there has been regular contact between Fisher German and the AP’s agent. The position regarding voluntary negotiations and land acquisition was confirmed by Fisher German to the AP’s agent in an email dated 8th June 2026. This confirmed that the Applicant is not seeking to progress negotiations for voluntary agreement on the AP’s holding.

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		categorically not true, as explained above. This is deliberate down-playing, of which NG is well aware, simply to suits its plans. NG states that “the Statutory Consultation route for the N2T pylons has carefully avoided homes.” No it has not. In the case of this Grade 2 Heritage Asset, [redacted] s Farm, which is also a family home and has been for nearly forty years, NG has very definitely not carefully avoided it. Very obvious misrepresentation, untruths and deliberate downplaying by NG, once again to suit its own plans. It also states that “most of the residential property along the route that are marginally impacted can be protected from visual impact with screening.” Categorically not the case with [redacted] Farm, which will have no less than five pylons, TB1, TB2, TB3, TB4 and TB5 looming over this Grade 2 Heritage Asset. Once again, very obvious misrepresentation, untruths and deliberate downplaying by NG The Applicant states that “the pylon routes have followed several principles including the Holford Rules. However, the Holford Rules state under Rule 2 that “where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.” It is possible to avoid impacting the Listed Building [redacted] Farm, but NG has chosen to deliberately ignore this. Under Rule 3 the Holford Rules state that “Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.” Again NG has chosen to ignore this by deviating off the main N2T line with its diversion to Ardleigh/Little Bromley. NG intends to change top quality and very high grade farming land into a major industrial area with its connecting wind farm locations, solar farms and battery parks. It should be choosing one of the less expensive and better options, and not destroying East Anglia for its own selfish greed and for the inflated egos of a few politicians. Rule 6 of the Holford Rules states that “In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or ‘wirescape’.” There is currently a line of pylons running into the smaller substation in the Ardleigh/Little Bromley area, and this will most definitely create a wirescape. Failure by NG to make proper representation for their own gain and advantage, and again causing a huge detrimental impact on the Grade 2 Heritage Asset, [redacted] Farm. NG mentions the Beaully-Denny Report 2024 commissioned by Scottish Renewables. Clearly NG is trying to squirm its way out of any obligation with its pathetic claim from that Report that the “average house value remained consistent in the areas where the new pylons and infrastructure were constructed.” It has already been proved by the owners of the Grade 2 Heritage	

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		Asset, [redacted] Farm, that this is not the case, as this property has been on the market for almost a year with only one viewing. NG goes on to state “some potential buyers could be deterred while others are entirely unbothered.” NG, please show us buyers who are “entirely unbothered?” It should also be made clear that mortgage companies are unwilling to lend to proposed purchasers of properties near pylons or substations. These are facts that NG has chosen to deliberately and wilfully ignore. The current owners of the Grade 2 Listed Heritage Asset, [redacted] Farm, would reiterate that they have tried to communicate with NG regarding the position NG have forced on the owners. There has been no response to a meeting held on 19th June 2024 with a representative from NG and a representative from Fisher German, despite their assurances about a response within a couple of weeks of that meeting. There has been no communication from NG, either directly or through the owners’ agent in response to that meeting. Why not? Apparently the Applicant is “surprised” to hear about this stated lack of communication. The Agent appointed by the owners has only had talks on Heads of Terms with Fisher German, and still nothing has materialised. NG claims to have engaged with communities throughout this proposed project, whereas the truth is that NG knows this an ill-conceived and rushed-through project, and is therefore avoiding engagement and contact with communities as much as it possibly can.	
REP5-293	Graham White	We have had notification that you are intending to use just outside our business premises for a construction site. We are objecting to this it is not suitable. We have lorries in and out all day. We do not want to be help responsible for any accidents caused by construction vehicles turning around in our entrance. This will disrupt our business with day to day running. This road floods badly in heavy rain, ditches are either side of where you are intending to use, diesel and debris from the construction vehicles will be going into the ditches which in turn will go into the river, its just not suitable the road is a country lane. We do not want a pylon in view of our business premises, this will devalue our property we have spent a lot of money and time in getting permission in developing this site not to be totally destroyed by Nation Grid. I am also concerned about health issues with a pylon being so near.	The Applicant notes the concerns raised by the Affected Party. There is a site access point proposed within the vicinity of the business, approx. 120 m away from the existing access to the business to enable access for construction traffic to join the construction haul road. The proposed Order Limits extend up to the business to accommodate visibility splays required for a design compliant and safe site access point; the works undertaken within the 120 m between the proposed access and the existing access shall be appropriate vegetation clearance to maintain the lines of sight. The Applicant has undertaken vehicle tracking analysis to confirm that the road is suitable for two-way HGV and crane movements. Existing ditches and highways drainage will be maintained and diverted if necessary. A Stage 1 Road Safety Audit has been undertaken for the proposed site access point to ensure safe access and egress. During the audit, no concerns were raised regarding proximity to the existing business access, or existing flooding; however, the Applicant also notes that any highway flooding issues are the responsibility of the Local Highway Authority. The impact of traffic on this road has been assessed as part of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] which has shown that there is no significant adverse effect. The contractor will be required to ensure no contaminants or debris impacts on the environment as per the 7.2 Outline Code of Construction Practice [Revision F].

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REP5-249	Great Horkesley Parish Council	Shared use A134 footway-cycleway Among the very greatest concerns of Great Horkesley Parish Council is the impact of the construction vehicles on the A134, the only main road in our village. There are four settlements on the road, the largest on Horkesley Heath in the south and the smallest around the ancient All Saint's church two miles to the north; the road is also the only link between the settlements and Trinity Secondary School. The only practicable route on foot or bicycle between the settlements, beside which runs a footway which in places is only one person wide. The road carries in excess of 5000 vehicles per day in each direction. Various traffic management features have been introduced onto the carriageway over the years in order to persuade traffic to adhere to the speed limits and to help people cross to and from bus stops. Whilst these have generally been successful, an HGV travelling at 30 or 40 mph alongside a footway only one person wide can still be frightening. In places, if two people are approaching each other, one has to step into the carriageway to pass the other. We have been told that in order to accommodate some 300 movements of construction traffic per day, much of our hard-won traffic calming and other safety measures along the A134 will need to be removed. That is the source of our greatest concern: there are no alternative routes for our cyclists and pedestrians, including the Trinity School pupils who twice-daily use the footway alongside the 60 mph section of the A134 – here, there can be no alternative because the A12 trunk road lies between the village and the school. The A134 is in poor condition, having been patched and re-patched by way of short-lived repair over many years. The areas around the five mini roundabouts that are the main components of the traffic calming and accident prevention were omitted from the last resurfacing. In these areas unsealed patching is widespread with the result that the road here is particularly prone to water ingress and damage during the winter months. The Council anticipates that before construction plant can start to use the road, it will need considerable reinforcement. It also anticipates that once construction has finished, further remedial work will be required. This is perhaps where the greatest potential benefit from the construction project to the village is to be found. The Council expects that as part of the planning consent, if it is forthcoming, there will be conditions requiring the applicant to ensure that during construction, pedestrians and cyclists will be able to use the section of the A134 between the settlements – essentially that section known as The Causeway – no less safely than at present even though there will be more, and larger, vehicles using it. The enduring benefit to the village from these works should be that as the A134 is reinstated after the construction phase, a shared use footway-cycleway would be constructed along the	The Applicant notes points raised as well as the requests for planning conditions to provide future benefits. The Applicant addresses these points in turn: i) Impact to the A134 during construction of the Project The concern around construction traffic on the A134 is noted. The Applicant has provided an overview of the net increase (maximum peak day) in construction traffic flows associated with the Project for the AM and PM peak hours along each Primary Access Route (PAR) in 7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]. This details how, for PAR 36 along the A134 a net increase of 118 total vehicles is expected in the AM and PM peak hours, of which 44 are expected to be Heavy Goods Vehicles (HGVs) with a duration of one week. The number of HGVs per hour on each PAR is anticipated to be consistent throughout the construction hours. To clarify, the proposed scheme is not to remove traffic calming measures to enable two-way HGV movements. The temporary removal would only be required for Abnormal Indivisible Loads (AILs) to pass and the calming would be reinstated using temporary traffic management measures between AIL movements. In relation to road condition surveys, 7.3 Outline Construction Traffic Management Plan [Revision E] to be secured via Development Consent Order (DCO) Requirement 4, sets out that the Applicant proposes to undertake pre- and post-construction condition surveys of the existing highway network on AIL and HGV routes. Paragraph 13 of Part 4 of Schedule 16 to 3.1 Draft Development Consent Order [Revision F] outlines the Applicant's approach to extraordinary traffic with regards to condition surveys and reimbursement of expenses. This specifies that the repair of any damage that is directly attributable to the Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense. Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any extraordinary expense, the relevant highway authority may have recourse to section 59 of the Highways Act 1980 in the usual way. i) Request for creation of a new shared use footway-cycleway The Applicant has set out above how the existing A134 would be temporarily impacted and reinstated during construction of the Project to ensure no harm to the existing route. The request to provide an additional new footway-cycleway would represent a proposal that is not required to mitigate effects of the Project, and would therefore represent betterment not secured via the DCO. Delivery of such a proposal would need to be secured via separate agreement with the Local Authority, assumed to be a bilateral s106 agreement. The relevant tests for s106 agreements are outlined in Regulation 122 of The Community Infrastructure Levy Regulations 2010. The obligation must be: • Necessary to make the development acceptable in planning terms • Directly related to the development • Fairly and reasonably related in scale and kind to the development. Given the Applicant's position as set out above, in which the temporary impacts to the A134 can be sufficiently mitigated through the DCO, it is considered that such an obligation would not meet the legal tests by virtue of not being necessary to make the development acceptable. The Applicant does however

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		entire length of The Causeway from Tile House Lane or perhaps even Coach Road in the south to Tog Lane in the north, and if possible beyond to London Road where it branches from the A134. If this means permanently narrowing the carriageway, so be it: the likely outcome will be slower vehicle speeds, another benefit to village residents. For the first time there would be an off-carriageway link between the settlements that comprise Great Horkesley. It would give the vast majority of residents a “green” access to the Dedham Vale National Landscape via Tog Lane and, on the other side of the A134, Boxted Church Road. Given connectivity with other cycle-friendly routes already negotiated to run generally southwards from Horkesley Heath and beneath the A12, it would also open up safer “green” access to the Dedham Vale for residents of Chesterwell and north Colchester generally.	note that such an opportunity to improve the usage could form part of a future community benefits programme, as set out in the row below, in which the community will be consulted on the key themes and priorities for any such funds to be directed to.
REP5-249	Great Horkesley Parish Council	Community Woodland Great Horkesley Parish Council has two further two proposals for legacies from the construction project. Firstly, on the assumption that there will be considerable landscaping of the new buildings left behind, it is suggested that a community woodland be created. Nothing of the sort currently exists in the village and there is little prospect of land currently used for agriculture being purchased for that purpose. While it would not be close to the greatest population on Horkesley Heath, it would of necessity lie close to, and have access from, the A134, alongside which would run the shared use footway cycleway linking all the settlements, including Horkesley Heath. It would thus be available to all village residents who might choose to make use of it.	The Applicant acknowledges the proposal for a community woodland and formation of a community trust as legacies from the Project. In line with government guidance (Community Funds for Transmission Infrastructure: Guidance⁵), if development consent is granted, the Project would deliver a Community Fund of approximately £30 million. We currently anticipate delivering this through two complementary elements: • A Local Fund – providing grants for communities closest to the route • A Strategic Fund – supporting longer-term investment aligned to shared local and regional priorities It is the local fund in particular that represents the most likely funding opportunity for the type of request made here, subject to an application being made once the Fund is live. Such a local fund will be administered by independent, third-party grant bodies, using local insight and agreed criteria to assess applications. Whereas the wider strategic fund will be delivered with input from local and regional stakeholders.
REP5-249	Great Horkesley Parish Council	Great Horkesley Community Trust The final proposal is for a community trust to be established. At present, there is comparatively little publicly-owned land in the parish beyond the 14 acres of the Jubilee Green which the parish council is in the process of acquiring from the City Council. Once that transfer is complete, the parish council will establish through public consultation a Jubilee Green development plan to improve its potential for recreational and fitness use by residents; this plan will require funding. Furthermore, under draft proposals being worked up by CCC planning policy, during the period of the emerging Local Plan further land in the village is expected to come into public ownership, the recreational development of which would require funding. From this point of view, the timing of the works in the village by UK Power Networks will be poor: it is likely that by the time the addition recreational land becomes available, the construction phase will be complete. To overcome this, a trust fund is suggested, with at least one trustee appointed from or by the permanent UK Power Networks staff based in the area. The role	The Applicant is currently developing our approach to community benefits for the Project, and in July 2026, we plan to begin consulting on how the community fund should be shaped. Throughout this consultation, we will engage with local communities and elected representatives to find out more about local priorities and where a fund could deliver long-lasting benefits. The feedback we receive will help inform our approach to delivering the community fund, focusing on key themes and priorities identified. While the community fund is not secured through the Development Consent Order and cannot be relied upon as mitigation, its delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community funding, independently of the planning regime. In terms of how a community fund would operate, we will outline an application process for funding following the consultation process. For the avoidance of doubt, the community fund is not a material consideration and is separate to the development consent process. No legal agreement is therefore required to secure the community funding as part of the development consent.

⁵ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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		of the Trustees would be to approve the contribution of funds to recreational projects connected with any community-owned buildings or land in the village, according to criteria to be agreed at the outset. The operation would be similar to that of the old Landfill Trusts, with the exception that funding would be drawn from a capital sum and therefore be finite rather than generated as a proportion of landfill tax. Wherever possible, the source of the funding would be permanently acknowledged.	
REP5-250	Historic England	Flordon Hall (NHLE1050698, listed grade II*). Responding to HE1.36 in First Questions concerning mitigation of impact on Flordon Hall the applicants state they considered mitigation through an alternative route, but this was not taken forward because of the impact on nearby residences. This means the impact on the designated asset could potentially have been further mitigated however this has been discounted because of the potential impact on residential amenity. We appreciate there are balancing factors in relation to decision making. Whilst we can comment upon the level of harm to the designated heritage assets, the overall balance with residential amenity is an aspect that Historic England are not in a position to comment on. This rests with the Examining Authority (ExA) in their consideration of the matter. As a apart of that the ExA would also need to consider if any proposed mitigation is suitable and has been applied appropriately in this case.	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.
REP5-250	Historic England	Tacolneston conservation area including All Saints' Parish Church (NHLE 1178820, listed grade I), Old Hall (NHLE 1373381, listed grade II*) and Manor Farmhouse (NHLE 1050043, listed grade II*). Responding to HE1.15 in First Questions concerning Tacolneston conservation area the applicants state they accept our view that the rural landscape setting could have been given greater weight in their Environmental Assessment and conclude that a lower level of less than substantial harm could be caused to the significance of the conservation area by the development in its operation phase. We agree with this assessment and recommend this assessment is included in the Environmental Statement (ES) and given appropriate weight by the ExA in their consideration of the matter.	The conclusion of lower less than substantial harm is already included in 6.11.A7 Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215].
REP5-250	Historic England	St Regimus' Parish Church, Roydon (NHLE 1050237, listed grade I). The applicant has commented on our Written Representation in document 8.8.1 (page 68). We previously raised concerns in our Written Representation (paragraphs 2.17- 2.23) that in our view the applicant had not considered the valley setting of the church. Their response again chiefly focuses on views from the churchyard, rather than views towards the church from the side and bottom of the valley or in general views which include both church tower and the proposed pylons.	In responding to the Historic England Written Representation in 8.8.1 Applicant's Comments on Written Representations [REP2-029] the Applicant explained how the assessment conclusions were reached, which included consideration of the valley setting of the Church of St Remigius as set out in that response. We understand that Historic England do not agree with the degree of less than substantial harm concluded, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position.

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		This additional clarification does not therefore address our comment. That views are limited from the churchyard by vegetation on the boundary appears in the applicant's representation and was repeated verbally during the Issue Specific Hearing on 29th April in response to questions. But we would note that there are several points on the southern boundary of the churchyard, as well as just outside it where views of the valley are unrestricted. We would again conclude that the visual impact on views from the churchyard, as well as views towards the church in its landscape setting have not been assessed in sufficient detail or given due weight by the applicant. We recommend the ExA specifically ask the applicant to address these matters in the assessment. The ExA would also need consequently to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	
REP5-250	Historic England	Bush Hall Historic England maintains a difference of opinion to the conclusions drawn by the applicant in relation to Bush Hall as set out at in document 8.8.1 (page 70). We are aware this is a non designated asset, but one which demonstrated higher values and potential equivalence to a designated heritage asset. We agree with the applicant that it is clearly not necessary, to undertake further archaeological evaluation to establish whether the site has a higher value or not, especially (as set out in our Written Rep) as there is clear evidence for an above average survival and preservation of the asset, and a good presentation of the earthworks. There is also a clear potential for the survival of archaeological deposits across the site in both the platform and the ditches. In addition, there is the potential for waterlogging. The partial backfilling of one arm does not seriously negatively affect the overall evidential or historic value. Our view is that it is clearly demonstrates factors that would place it with in the high value category. In terms of level of harm, we note the asset is partially within the order limits and would be over sailed by the cables. The cables would therefore be highly visible from the asset and therefore within the landscape that contributes most to the significance of the assets. The magnitude of change is therefore also high. We appreciate the applicant has set out the controls and mechanisms that would be in place to manage impacts and confirm these are appropriate and proportionate. However, an appropriately ascribed value for the asset would also affect the level of impact and harm. We therefore recommend the ExA asks the applicant to address this inconsistency. This is to provide appropriate evidence to allow the balance to be weighed between harm and benefit for this asset. The ExA would also need to consider if the proposed	Although Historic England and the Applicant have a difference of opinion on the value of the asset, the higher value considered appropriate by Historic England would not alter the assessment conclusion (of permanent moderate adverse effect), as physical impacts to the asset have been avoided through mitigation, as set out in 8.8.1 Applicant's Comments on Written Representations [REP2-029]. An assessment of high value would not alter the nature of the impacts through change to setting, and therefore the magnitude of impact would remain medium adverse. Following the assessment methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [Revision C], this would not alter the conclusion of moderate adverse, and significant, effect. Therefore, even with Historic England's assessment this would not add sufficient weight to change decisions on Project design in this location.

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		mitigation is suitable and has been applied appropriately in this case.	
REP5-250	Historic England	St Mary's Parish Church, Burgate (NHLE 1032797, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 71). We note the applicant's agreement with our assessment that that views from the asset towards the proposed development are important. We also agree with their assessment that it would result in a lower level of less than substantial harm to the significance of the listed building, and recommend this assessment is included in the Environmental Statement (ES) and given appropriate weight by the ExA in their consideration of the matter.	The conclusion of lower less than substantial harm is already included in 6.11.A7 Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215] .
REP5-250	Historic England	Mellis Conservation Area, including the Parish Church of St Mary the Virgin (NHLE 181735, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 71). In this they accept that views to the southwest of the conservation area would include the proposed pylons but conclude that this would not increase the level of harm they previously assessed (i.e. a lower level of less than substantial harm). We remain of the view that the southern part of the western end of the conservation area is an important part of this designated heritage asset with open views across it towards the proposed development and that the visibility the applicants acknowledge would result in additional harm to its significance. As we noted in our Written Representation (paragraphs 2.30- 2.34), the size of the historic common at Melis and the fact that it has not been sub divided by buildings encroaching into the open space makes the ability to appreciate it in a rural context important. We therefore feel that the additional impact on views over the southwest part (which the applicant has also accepted) would increase the level of harm to a middle level of less than substantial harm to its significance.	In responding to the Historic England Written Representation in 8.8.1 Applicant's Comments on Written Representations [REP2-029] the Applicant explained that there would be distant views to pylons over 1 km from the conservation area to the south west. To the north of the conservation area, the 400 kV pylons would replace existing 132 kV overhead line. On this basis the Applicant continues to consider its assessment appropriate. We understand that Historic England do not agree with the degree of less than substantial harm concluded, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position.
REP5-250	Historic England	Moat Yard Plantation Mellis (2253 3.3.372) PP71 We acknowledge the applicants' comments and revisions, we confirm we agree with the assessment and do not have any further comments.	Noted.
REP5-250	Historic England	Roydon Hall (NHLE 1033215 listed grade II*) and Barn to the Northwest and (NHLE 1284584, listed grade II*), near Creting Saint Peter. The applicant has commented on our Written Representation in document 8.8.1 (page 73), acknowledging our view that there could be views of the listed building towards the east in which the proposed pylons would appear. We understand an additional verified viewpoint image might be produced to illustrate this, but on the basis of the information available we would agree with the	The Applicant confirms that 8.4.10.2 Response to Historic England Comments on ExQ1 HE1.12 - Roydon Hall Visualisation [REP5-191] was submitted at Deadline 5. The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.

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		applicant's conclusion that the proposed development would result in a mid-level of less than substantial harm. We also note that in responding to HE1.36 in First Questions concerning mitigation of impact on Roydon Hall the applicants state they considered mitigation through an alternative route but that this was not taken forward and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on the justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.	
REP5-250	Historic England	Creeting Hall (NHLE 1352073, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 74). In this, they acknowledged that views of the listed building from the east and southeast would be affected, as would views from Mill Lane. However, the applicant states this would not 'lessen understanding of the asset at the heart of a working farm complex'. To clarify, we have not suggested it would have such an effect. We do consider though that the presence of the proposed pylons in this landscape could detract further from the rural setting of this vernacular building and that this might result in additional harm to that identified by the applicants in the Environmental Statement. This additional harm does not appear to have been acknowledged by the applicant and in our view could raise the level of harm to the upper end of mid to less than substantial harm. We recommend the ExA specifically ask the applicant to address these matters in the assessment.	The Applicant notes Historic England's comment and the agreement on a mid level of less than substantial harm. Although Historic England consider this to be at the 'upper end of mid less than substantial harm' the assessment methodology for assessment of harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], Section 2.3), which is agreed with Historic England, does not further subdivide the three categories of less than substantial harm (lower, mid and upper less than substantial harm), therefore we have not assessed sub categories beyond this.
REP5-250	Historic England	Badley Church Green Conservation Area including Badley Hall (NHLE 1231083, listed grade II*), Dovecot (NHLE 1231084, listed grade II*) Barn (NHLE 1231085, listed grade II*) and St Mary's Parish Church (NHLE 1231082, listed grade I). The applicant has commented on our Written Representations in document 8.8.1 (page 75). In this the applicant acknowledges that 'moderately long distant views of the pylon tops might be visible from the edge of the conservation area closest to the proposed development'. They further note that any impact would not be sufficient to raise the level of harm from the lower lessen substantial category. We agree with this assessment.	Noted.
REP5-250	Historic England	Little Wenham Castle (NHLE 1003759, Scheduled, and NHLE 1033405, listed grade I), St Lawrence's Parish Church (NHLE 1033410, listed grade I) and Barn North of Castle (NHLE 1194552, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 75). In this the applicant acknowledges that views of the pylons may potentially be seen from the immediate vicinity of the grade II* listed barn but 'disagree with	We understand that Historic England do not agree with the degree of less than substantial harm concluded for the 'Barn North of Castle' (1194552), although we note they are in agreement that the harm is in the less than substantial category. Regarding the extent of a heritage asset's setting the Applicant notes that 'The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (Historic England 2017) does not specify that everything that is visible from an asset is within its setting, although

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		the assumption [made by Historic England] that intervisibility alone means the setting of the barn extends to the order limits.' They go on to note that 'the setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development.' Our assessment has not made that assumption, and we agree that the definition of setting of a heritage asset (as stated in the glossary to the National Planning Policy Framework) is 'the surroundings in which the asset is experienced.' We rather considered, based on viewpoint image 3.09 (Figure 7.12.F79_VP 3.09), that the agricultural landscape in which the grade II* listed barn is experienced would be affected by the proposed pylons. As this agricultural landscape is important to the understanding of the barn and its historic function as an agricultural building, we conclude that the proposed development would detract from this setting and would therefore cause harm to the significance of the barn. We do however remain of the view that this would be harm at a lower level of less than substantial harm.	visibility both from and to an asset will be an important consideration. The Applicant considers that the assessment applies the guidance correctly as it considers the individual characteristics of each asset in order to define its setting. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029], page 75.
REP5-250	Historic England	All Saints' Parish Church, Fordham (NHLE 1239789, listed grade I). The applicant has commented on our Written Representations in document 8.8.1 (page 77). In this the applicant does not address the specific matters raised in our representations that there are views from the churchyard towards the post pylons only some 500m away and that verify viewpoint image VP 4.08 shows both the church tower and the pylons in the same image. The image shows that the asset can be experienced within the area depicted, and this is within the setting of the listed church. In our view the development would detracts from the setting of the church and harms its significance at the lower end of the lesser substantial range. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	The Applicant disagrees it has not addressed the comments provided in Historic England's Written Representation [REP1-191]. We understand that Historic England do not agree with the degree of less than substantial harm concluded for the Church of All Saints, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].
REP5-250	Historic England	Fordstreet Conservation Area, including Wash Farmhouse (NHLE 1239836, listed grade II*), Barnards Farmhouse (NHLE 123974, listed grade II*), Threshers (NHLE 1110885, listed grade II*) and The Old House NHLE 1337411, listed grade II*). In responding to HE1.36 in First Questions concerning mitigation of impact on the conservation area the applicants state they considered mitigation through an alternative route to the west but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.
REP5-250	Historic England	Barn South West of Little Tey House (NHLE 1266779, listed grade II*).	The Applicant notes Historic England's comment and the agreement on a mid level of less than substantial harm. Although Historic England consider this to be at the 'high order of mid-level less than substantial harm' the assessment

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		The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant repeats their assessment that the impact of the proposed development would result in a mid-level of less than substantial harm. They do not respond to the point made in our Representations (paragraph 2.74) that being only 186m from the listed building the 'dominant scale of the pylons and the importance of this side of the barn in having a clear relationship to fields would make that [harm] of a high order of mid-level less than substantial harm.' We remain of the view that this would be the case. We recommend the ExA ask the applicant to address the inconsistencies in their assessment, and dependent on the outcome of that, the ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case. In responding to HE1.36 in First Questions concerning mitigation of impact on the conservation area the applicant states they considered mitigation through an alternative route to the west but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the Examining Authority in their consideration of the matter.	methodology for assessment of harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]), which is agreed with Historic England, does not further subdivide the three categories of less than substantial harm (lower, mid and upper less than substantial harm), therefore we have not assessed sub categories beyond this.
REP5-250	Historic England	Parish Church of Saints Margaret and Catherine, Aldham (NHLE 1170063, listed grade II*). The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant notes that planting would restrict views and result in a mid-level of less than substantial harm and that the proposed pylons would not 'dominate the skyline'. Without a viewpoint image we are unable to comment on the precise degree of visual dominance but would accept that the resulting harm is likely to fall within the mid-level of less than substantial harm range. In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered mitigation through an alternative route but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the Examining Authority in their consideration of the matter.	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.
REP5-250	Historic England	Aldham Hall (NHLE 1306270, listed grade II*). In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered mitigation through an alternative route to the west, but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.

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		justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.	
REP5-250	Historic England	Houchin's Farmhouse, Broad Green (NHLE 112318, listed grade II*). In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they were unable to identify any alternative routes and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point given the proximity of the proposed pylons to the listed building and the distance to the Draft Order Limits. Historic England is not in a position to comment on any justification for not establishing alternative routes and would leave this to the ExA in their consideration of the matter.	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). We also note there is no disagreement on the conclusion of assessment.
REP5-250	Historic England	Feeringbury Manor (NHLE 1306710, listed grade II*) and Ancillary Building to Southeast (NHLE 1123828, listed grade II*). The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant acknowledges our view that views to and from the heritage assets from the south were underrepresented in the Environmental Statement's assessment. It is stated that because of screening vegetation the level of harm remains at the 'lower less than substantial' level. We would accept the level of harm as being within this category but remain of the view that the impact on views to and from the south presents an additional element of harm that would need to be considered. We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	The Applicant notes there is no disagreement on the conclusion of assessment. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029], page 77-78.
REP5-250	Historic England	Rivenhall Place (NHLE 1122598, listed grade II*). In responding to HE1.31 in First Questions the applicant notes the closest proposed pylon would be some 490m away but would affect only a 'small part of the setting' of Rivenhall Place, resulting in harm to its significance at the lower end of less than substantial harm. We would broadly accept that position, however we note that where visible from the grounds of the Hall the pylons could have a pronounced impact.	The Applicant notes there is no disagreement on the conclusion of assessment. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].
REP5-250	Historic England	Parish Church of St Mary and All Saints, Rivenhall (NHLE 1169594, listed grade I) and Roman Villa, Anglo-Saxon Hall, Cemetery and Church Site, Around and to the North and East of St Mary and All Saints' Church (Scheduled Monument NHLE 1013831). The applicant has commented on our Written Representations in document 8.8.1 (page 79). In this they maintain that the setting of the heritage assets does not extend to the draft order limits, but they have not responded to the comments we made on this matter in our Written Representation (paragraph 2.93). In this we drew attention to viewpoint image HE 13 (Figure 7.12.F220-HE13) which shows the proposed pylons visible in the	We understand that Historic England do not agree with the degree of less than substantial harm concluded for the Roman Villa, Anglo-Saxon Hall, Cemetery and Church Site, Around and to the North and East of St Mary and All Saints' Church Scheduled Monument (1013831), although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].

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		surroundings in which the listed church and scheduled monument can be experienced (the definition of setting set out in the National Planning Policy Framework). This indicates that the setting does extend to the Draft Order Limits and the closet pylon (TB091) would be some 987m from the church. At this distance the line of pylons would not be dominant in the landscape, but it remains our view that it could detract from the rural setting of both these heritage assets and so would potentially result in harm to the significance of the monument as well as the church. We would consider this at the lower end of the less than substantial category. We recommend the ExA specifically ask the applicant to address these matters in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	
REP5-250	Historic England	Cressing Temple (NHLE 1002122, Scheduled), including Wheat Barn (NHLE 1123866, listed grade I) and Barley Barn (NHLE 1123865, listed grade I). The applicant has commented on our Written Representations in document 8.8.1 (page 80). In our Representations (paragraph 2.98) we questioned how the applicants had concluded that the setting of the listed Wagon Lodge and Garden Wall would not extend to the Draft Order Limits. The applicant has not addressed this, but repeats the remark made in their comments on Written Representations regarding Little Wenham Castle (above) that we assume 'intervisibility alone means the setting of the Wagon Lodge and garden wall extends to the order limits.' As before, our assessment is not based on this assumption, and we are aware that the definition of setting of a heritage asset (as stated in the glossary to the National Planning Policy Framework) is 'the surroundings in which the asset is experienced.' We therefore consider, based on viewpoint image 5.11 (Figur5e 7.12.F126-VP5.11), that the proposed development could be seen in the surroundings in which these heritage assets are experienced and, as the applicant concludes regarding the Scheduled Monument, the result might be harm to their significance in the lower level of less than substantial harm. We recommend the ExA specifically ask the applicant to address these matters in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	We understand that Historic England do not agree with the degree of less than substantial harm concluded for the Wheat Barn (1123866) and Barley Barn (1123865), although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].
REP5-250	Historic England	St Mary's Parish Church, Fairstead (NHLE 1337780, listed grade II*). The applicant has commented on our Written Representations in document 8.8.1 (page 80-81). In this the applicant accepts that the intervisibility between the church and the proposed development could be significant, but the question we have raised in our Representations (paragraph 2.106 - 2.108) is that Viewpoint image VP5.08 (Figure 7.12.F143_VP5.08) shows the proposed pylons visible in the surroundings in which the heritage asset can be experienced (i.e. its setting). We therefore conclude	The Applicant disagrees it has not addressed the comments provided in Historic England's written representation [REP1-191]. We understand that Historic England do not agree with the degree of less than substantial harm concluded for the Church of St Mary, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].

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		that the development would be in its setting and that this might result in harm to significance. This has not been addressed. We therefore recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	
REP5-250	Historic England	Newney's Farmhouse, Ranks Green (NHLE 1123450, listed grade II*). The applicant has commented on our Written Representations in document 8.8.1 (page 81). This states that views towards the asset from the 'associated ground would not be affected'. Given that the proposed pylons would be some 250m from the listed building and the limited planting on the boundary of the garden we do not agree with this assessment and consider the significance of the listed building would likely be harmed. Without a verified viewpoint image, the precise degree of impact is hard to establish but given the proximity the development could be a dominant feature resulting in a lower or even mid-level of less than substantial harm. We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	The Applicant thinks that Historic England have misunderstood the response provided in 8.8.1 Applicant's Comments on Written Representations [REP2-029], which states on page 81: <i>'The Applicant acknowledges that the Project would be an intrusive element within the rural landscape to the south of the assets and that the Project would introduce pylons in the background of the assets as they are approached from the north and the west along Fairstead Lodge Road. The front elevations of the farmhouse and barn, however, face westwards away from Project and would be largely unspoiled. Likewise, views back towards the assets from within the associated grounds will not be impacted. The Applicant is therefore satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], of minor adverse significance of effect and in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] of lower less than substantial harm in regard to Newney's Farmhouse and associated barn are appropriate.'</i> As we have already concluded a lower level of less than substantial harm we would consider this to be agreed unless Historic England provide any further response.
REP5-250	Historic England	Little Waltham Conservation Area. The applicant has commented on our Written Representations in document 8.8.1 (page 81-82). This accepts that the proposed development would be within 150m of the conservation area boundary but considers the part of the conservation area in question to be of limited value as the rural setting of the village has been degraded by the modern bypass road. The conclusion is that the level of harm would remain at the lower end of less than substantial. We feel the area of the conservation area closest to the pylons has been underrated by the applicant. It has however been included within the designated heritage asset (not just part of its setting) and illustrates the relationship of the settlement to the river valley. We have also raised the possibility that such is the proximity of the proposed pylons at this point that they might be visible between buildings on the Street. This has also not been addressed by the applicants. We conclude that there could be additional harm to this part of the conservation area which has not been included in the applicant's conclusion, although the level of harm is likely to be within the category of less than substantial harm. We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	The Applicant thinks that Historic England have misunderstood elements of the response provided in 8.8.1 Applicant's Comments on Written Representations [REP2-029]. Our response set out that the construction of the B1008 bypass had reduced the contribution of the land west of the conservation area to its setting and significance, as it had introduced a new division with infrastructure and tree planting lining the road, which forms the western boundary of the conservation area. We did not state that the western part of the conservation area was less valuable or that the rural setting of the conservation area does not contribute to its value. However, we set out that the contribution the agricultural land west of the conservation area makes to the value of the conservation area is proportionally of much less significance than internal vistas along The Street and along the route of the Chelmer River towards the Church of St Martin. We understand that Historic England do not agree with the degree of less than substantial harm concluded for Little Waltham Conservation Area, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].

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REP5-250	Historic England	Great Waltham Conservation Area including St Lawrence's Parish Church (NHLE 1122058, listed grade I), Badyngghams (NHLE 1122056, listed grade II*), Langley Park (NHLE 1000241, Registered grade II) and Langleys (NHLE 1305533, listed grade I). The applicant has commented on our Written Representations in document 8.8.1 (page 82-83). In our Written Representations (paragraph 2.121) we drew attention to the southern part of the conservation area at Minnow End). The applicant responds to this, noting that this is only a small part of the agricultural setting of the conservation areas as a whole and taking the view that it does not contribute to the significance of this heritage asset to the same degree as the interior of the village and the parkland. Our view remains that the agricultural setting of the conservation area is important in an understanding of the village and Langley Park's historic significance. From the applicant's comments it is not stated if they have concluded the effect on the southern part of the conservation area would be additional harm, so we remain of the view that this would raise the level of harm they have previously concluded, perhaps higher within the less than substantial harm range. During the Issue Specific Hearing on 29th April in response to questions about views from the interior of Langley's mansion house the applicant commented on the views from ground and principal first floor rooms looking towards the Draft Order Limits. Their conclusion appeared to be that the quality of the first-floor rooms' interiors was such that views from them had not been considered significant, although they did seem to accept that views from houses of this type were often important. We consider it might be helpful to the ExA if the applicant provided more clarity on these views and their position, perhaps including images from the historic first floor principal room to illustrate it. In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered an alternative route to the west of Great Waltham but that this was not taken forward. Historic England is not in a position to comment on any justification for not taking forward the alternative route as this rests with the ExA in their consideration of the matter.	The Applicant provided further clarification regarding views from Langleys Grade I listed building in 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302], which set out that on the basis of desk-based research the Applicant understood that there are no significant rooms designed to have group functions, such as long galleries, on an upper floor from which views might be an important additional consideration. The Applicant notes the viewpoint locations in this area were agreed with Historic England prior to the submission of the Development Consent Order application. We understand that Historic England do not agree with the degree of less than substantial harm concluded for Great Waltham Conservation Area, although we note they are in agreement that the harm is in the less than substantial category. The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]). The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].
REP5-250	Historic England	Broomfield Conservation Area and St Mary's Parish Church (NHLE 1338425, listed grade II*). In responding to HE1.15 in First Questions the applicants state that the church yard is partially screened by vegetation but that the church's setting does extend to the draft order limits and they conclude that the impact of the proposed development would result in a lower level of less than substantial harm to its significance. We agree with this conclusion. As we have previously noted in our Written Representation (paragraphs 2.123-124) the conservation area does however include the churchyard (the churchyard itself is therefore part of the designated heritage asset). It also includes land immediately	The Applicant notes Historic England's agreement with the assessment of the Church of St Mary. We understand that Historic England do not agree with the assessment of Broomfield conservation area, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].

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		west of the churchyard from which both the church and the same land to the west can be seen. In answer to Question HE1.15 the applicant states that the conservation area's setting is only 'immediate agricultural land to the west'. This seems to suggest that that the setting of the conservation area at this point is different from that of the church. However, the surroundings in which church and conservation area are at this point experienced are clearly the same, their settings must, therefore, be the same. The applicant has not addressed this. We therefore maintain our view that there would be a lower degree of less than substantial harm to the conservation area resulting from the proposed development. We recommend the ExA specifically ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	
REP5-250	Historic England	Former Parish Church of St James, Chignall St James (NHLE 122199, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 84). This describes the 'secluded environment' of the churchyard but doesn't respond specifically to our comments on views towards the church in its setting which could be affected by the proposed development. As the closest pylon would be approximately 390m from the church we conclude there could be views of the church also featuring the pylons and there might be a degree of less than substantial harm to its significance resulting.	The assessment presented in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] concludes lower less than substantial harm for this designated asset. Given the comparatively low height of the church, which does not feature a tower or spire, the assessment, informed by site visits, considered that it was not a dominant feature in wider views around the landscape. Although it would likely be possible to see the church and the pylon in the same views we do not consider that this increases the lower less than substantial harm already concluded for this asset. Given that the Applicant's assessment concluded that some less than substantial harm would occur due to the presence of the overhead line in the setting of the asset we would consider this to be agreed unless Historic England provide any further response.
REP5-250	Historic England	Chobbings Farmhouse (NHLE 1306286, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 85). In this 20th century development adjacent to the site is mentioned as not affecting the relationship between the listed building and the proposed development. The presence of vegetation on the rear boundary of the house is also noted, and this seems to be a principal reason for the conclusion that the setting of the farmhouse does not extend to the draft order limits 'solely because of intervisibility'. Again, we would want to draw attention to the comment in our written representation paragraph 2.127 that viewpoint image HE39 (Figure 7.12.F-248-HE39) shows the pylons in the surroundings in which the listed building is experienced. As this is the definition of the setting of a heritage asset in the glossary of the National Planning Policy Framework, we conclude that the proposed development would be in the setting of the listed building and potentially result in harm to its significance at a lower less than substantial level. We recommend the ExA specifically ask the applicant to address this matter. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	We understand that Historic England do not agree with the degree of less than substantial harm concluded for Chobbings Farmhouse, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].

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REP5-250	Historic England	Hylands Park (NHLE 1000197, Registered grade II*) and Hylands (NHLE 1264253, listed grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 85). In this the applicant agrees that the land to the west of the registered park does constitute part of its setting but states that this setting only extends by 800m, rather than being the surroundings in which the asset is experienced (the definition of setting in the glossary of the National Planning Policy Framework). No evidence is provided to substantiate this 800m limit to ‘experience’ but even without this we would note that the closest pylon would be some 600m from the edge of the registered park. We therefore maintain the view in our Representations (paragraph 2.132) that this would result in harm to the significance of the heritage asset at a lower level of less than substantial harm. We therefore recommend the ExA specifically ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	In addition to the Applicant’s previous comments in 8.8.1 Applicant's Comments on Written Representations [REP2-029] the Applicant emphasises its original assessment in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision B] that the very intentionally placed tree belt and woodland, particularly on the western and southern boundaries, emphasise the internal focus of the park. While we agree with Historic England that the setting of the park extends beyond its boundaries, we maintain that it does not extend to the Order Limits given this. For clarity the distance between the closest pylon, TB175, and Hylands Park is approximately 770 m at the closest point.
REP5-250	Historic England	Ingatestone Hall (NHLE 1187315, listed grade I), Gatehouse and Courtyard Ranges (NHLE 1197286, listed grade II*) and Granary 130m northwest of Ingatestone Hall (NHLE 1298752, listed grade II*, formerly listed as ‘barn’). The applicant has commented on our Written Representation in document 8.8.1 as regards the grade II listed cistern house and wall to the north and east of Ingatestone Hall (page 86). In this the applicant states that the proposed development would be ‘beyond the edge of the valley in which they are located’ and therefore conclude that their setting does not extend to the Draft Order Limits. This may be the case, but the proposed pylons near Buttsbury church are close to the edge of the valley and given their height it is possible they could be visible. It is unclear if the applicants have carried out calculations about the height and therefore potential visibility, but we remain of the view that should the pylons be visible then they could potentially detract from the otherwise rural setting of these assets. We recommend the ExA ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.	We understand that Historic England do not agree with the degree of less than substantial harm concluded for Cistern House (1187282) and Garden Wall North and East of Ingatestone Hall (1297190) located within the Ingatestone Hall complex, although we note they are in agreement that the harm is in the less than substantial category. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position in 8.8.1 Applicant's Comments on Written Representations [REP2-029].
REP5-250	Historic England	St Mary’s Parish Church, Buttsbury (NHLE 1264434, listed at grade II*). The applicant has commented on our Written Representation in document 8.8.1 (page 87-88), Commenting that they would maintain their view that the harm to the significance of the church would be at a mid-level of less substantial harm not the higher level within that middle range which we have suggested. We have no additional comment to make on this conclusion. In responding to HE1.36 in First Questions concerning mitigation of	The Applicant notes Historic England’s comment and the agreement on a mid level of less than substantial harm. Although Historic England consider this to be at the ‘higher level within that middle range’ the assessment methodology for assessment of harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]), which is agreed with Historic England, does not further subdivide the three categories of less than substantial harm (lower, mid and upper less than substantial harm), therefore we have not assessed sub categories beyond this.

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		impact on the listed building, the applicant states the proposed pylon route has not been moved but that consideration of using lower pylons to reduce the visual impact still further was considered. This has not been taken forward. They also state that in their view additional planting would not make any significant contribution to mitigation. We are inclined to agree with the latter point given the proximity of the proposed pylons to the listed building and the distance to the Draft Order Limits. Clearly lower pylons could reduce visibility, but Historic England is not in a position to comment on any justification for not taking this forward and would leave this to the Examining Authority in their consideration of the matter.	The Applicant has no further comments to make in addition to those provided in response to HE 1.36 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]).
REP5-250	Historic England	St Clere's Hall, Stanford Le Hope (NHLE 1111565, listed grade II*). In responding to HE1.15 in First Questions the applicant states that they have reviewed their assessment of the setting of the listed building and conclude that it does make a minor contribution to significance but agree with our conclusion that this would not constitute harm to the significance of the designated heritage asset.	Noted.
REP5-250	Historic England	There are several outstanding matters with regards to the OWSI, OAMS and relating the technical delivery of the archaeological mitigation, such as the geo-archaeological programme, and we are continuing to work with the applicant to address these matters through continued engagement and through the SoCG. As with all our advice we hope that these comments are useful. We are pleased to see that many of the points we have mentioned have been addressed by the applicant and confirm that we remain in discussion on other matters. We appreciate there are still a small number of remaining differences.	7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] (OAMS-OWSI), submitted at Deadline 5, addressed the comments raised by Historic England, including provision for further geoarchaeological work. In a meeting on 19 June 2026 Historic England confirmed that the OAMS-OWSI was agreed, and this is recorded in the Statement of Common Ground. Following this meeting the Applicant does not believe there are any outstanding matters under discussion with Historic England.
REP5-295	Jennifer Micklem	I do not believe that Langleys, a Grade I listed building with Grade II* registered park and gardens, has been correctly assessed by either Historic England or National Grid's heritage advisers. The setting of Langleys is a fundamental component of its significance and heritage value. Therefore, the conclusion that the proposal would result in only "Lower Less Than Substantial Harm" is, in my view, incorrect and significantly understates the impact. The principal vistas from the house, formal gardens, walled garden and pool garden would be severely harmed by a line of either 40-metre or 50-metre pylons. These structures would form a prominent and permanent feature within key views and would be continuously visible, rather than merely "occasionally visible" as stated in National Grid's Environmental Statement (Volume 6, Document 6.11.A7). National Grid continues to justify the use of 40-metre and 50-metre pylons through the Waltham Gap on the basis that it is following Historic England's recommendations. However, Historic England did not undertake a site visit to Langleys. Given that the	The Applicant acknowledges the comments regarding the assessment of Langleys Registered Park and Garden and the associated Grade I listed building. The matters raised in respect of Langleys, including the assessment of its setting, key views and the level of harm identified, have previously been considered and addressed in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], 8.8.1 Applicant's Comments on Written Representations [REP2-029], 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] (including responses to HE 1.18 and HE 1.36). The Applicant confirms that the routeing and design of the Project have taken into account a range of environmental and technical considerations, including the cultural heritage value of the landscape in the vicinity of Langleys, as set out in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. The Applicant does not have any further submissions to make on this matter at this time and defers to its previous submissions referenced above. Should the

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		house and gardens are privately owned, it is difficult to see how the impact on their setting could have been properly assessed without direct access to the site and its designed landscape. Furthermore, National Grid's proposal appears illogical. It proposes four reduced-height 40-metre pylons north of the River Chelmer, while retaining two standard-height 50-metre pylons to the south. Yet it is the pylons south of the river that would be most visible from Langleys and its gardens, causing the greatest harm to the property's setting and key views. This approach seems counterintuitive and inconsistent with the stated objective of reducing visual impact. I urge the planning inspectorate to give serious consideration to alternative solutions that would avoid or substantially reduce harm to this nationally important heritage asset and its historic landscape. National Grid has recognised elsewhere in the country that overhead transmission infrastructure can cause unacceptable harm to valued landscapes and has adopted alternative approaches where justified. In this case, the setting of a Grade I listed building and its associated historic landscape is of national importance. It is therefore not credible to suggest that an overhead pylon route across these historic vistas is the only, or most appropriate, solution. There is no clear evidence that alternatives such as undergrounding, route realignment, or other technologies have been rigorously assessed and discounted on grounds other than headline cost. A more balanced appraisal is required, one that properly reflects the exceptional heritage significance of Langleys and the irreversible harm that would result from the proposed development.	Examining Authority consider that any further clarification is required, the Applicant will seek to provide this.
REP5-296	Jeremy Fisher	[It is disappointing that the ExAs will not be looking at Faulkbourne Estate pylons 100-115 on this occasion as they drive past] We will therefore have to continue to oppose given that NG will still not engage	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 construction stages. A meeting was held on the 2 June 2026 with the AP's representative (which has changed since the previous CA hearing) and AP on-site to restart discussions. The Applicant was also in attendance at this meeting. The Applicant has taken away a number of actions to review and will be responding on these in due course. Below is a full summary of engagement with the AP since the CAH2 hearing: • 5 May 2026: phone call held with the AP's agent (Whirlledge and Nott) to arrange a further site meeting • 13 May 2026: notification from Whirlledge and Nott that they are no longer acting for the AP and that Brown and Co have been instructed • 14 May 2026: call with AP's new agent to run through current position of the Project, heads of terms and arranging a site meeting • 2 June 2026: site meeting held at AP's land where the following matters were discussed:

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			– Route design – straightening of the route between TB104 and TB109, of which the request was captured by the Applicant and referred back to Project engineers for guidance – Temporary haul road relocation for TB100 and TB101 – captured by the Applicant and referred back to Project engineers for guidance – Relocation of the temporary haul road further south that provides access to TB103 and also TB104 – The acquisition site for Cable Sealing End compounds – landowner requests the acquisition area to be reduced down removing the north-eastern area of the proposed acquisition. Landowner is highly opposed to the acquisition. The Applicant has reviewed the pylon positional changes but the position remains unchanged given the increased effects to residential properties arising as a result of the angle pylon moving to TB104 which makes this alternative change less preferred. Haul road changes require longer routes or propose the use of access locations that are not safe. The Applicant is carefully considering the potential to reduce the extent of land required and meet Biodiversity Net Gain (BNG) requirements elsewhere. The Applicant believes that around 3 hectares of the field may be able to be returned to agricultural use with the BNG provided elsewhere. This would follow the completion of construction activities, after the retention of sufficient land for soil storage and landscape mitigation measures. • 3 June 2026: Applicant response to AP's agent providing the consultation response to AP's early requests for changes to the alignment • 10 June 2026: Applicant sent email to AP's agent following the site meeting with response to the points raised having received guidance on request from Applicant's design team, confirming routeing decisions and the limiting factors in the area • 10 June 2026: AP's agent responded to the response from the design team, with further questions on the design • 15 June 2026: Applicant liaised further with the AP's agent over email responding with further guidance on the AP's agent's queries to the design response. 1 July 2026: The Applicant met with the landowner and their agent on site to discuss the comments raised both at CAH3 and to provide further feedback on comments raised on 2 June 2026. The items that were discussed included BNG land assessment (exploring whether BNG requirements can be met elsewhere), extent of land acquisition, haul roads, routeing and siting reasoning and decision making and the extent of requirement on non-intrusive survey scope. The Applicant is considering further suggestions made by the AP at this meeting and has been asked to provide further clarifications on haul road specification, ford crossing methodology, scaffolding locations, permanent access routes and the micro-siting of pylons. The Applicant will respond in due course once the information is available as part of the ongoing design process.
REP5-298	Joanne Lesley Elliott	I would like to highlight the Colne valley Technical Landscape Note submitted by [redacted] following question LV2.18 of the Examining Authority's second round of written questions.	The Applicant has provided a full response to the Colne Valley Landscape and Visual Technical Note in Appendix B in Document 8.4.15 - Applicant's Comments on Responses to ExQ2 (also submitted at D6).

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REP5-300	John Briggs	During the application process we have been designated as a Land Owner, as such we were afforded a meeting with NG representatives Fischer German. As part of these meetings with two representatives from Fisher German they attended our property on two occasions. The discussions covered the proposed routes, heritage status and mitigations. Fischer German took minutes of the meetings and were requested to provide copies of the minutes which they have not provided, they were contacted on several occasions and requested to provide minutes which have refused. As part of our discussion the change in the route of the pylons was discussed, any details to justify the change in route was not provided any discussions relating to mitigation were rejected, and were advised any future changes would not occur and the current route was fixed. In reference to the electricity act 1989 and the application of EN-1 and EN-5 the Historic Environmental Baseline Report failed to recognise Bleak Hall as historic asset initially, it was listed in 1986 as a Grade ii building with the listing entry of 1251669. We understand that in the initial phases of planning an objection from an equestrian facility resulted in the route being changed to impact Bleak Hall, pylons RG197 - RG200, we understand that as stated in the NG core document CD-5 "That any enhancements should not result in any other significant adverse impact". The current route may have reduced the impact on an equestrian facility but has an adverse impact on our property and heritage asset which conflicts with EN-1 that details how outlines how historic buildings, must be assessed and protected. During meetings with Fischer German the detail of the objection was not made aware to us, it should be noted that Bleak Hall also may be classified as an equestrian facility, as we have both stables and horses on site, again this has been overlooked to our detriment. In reviewing the information available, the requirements detailed in EN-1 / EN-5 have been ignored in that the HEBR had initially failed to recognise Bleak Hall as a Heritage Asset, the objection raised has resulted in the route being altered to impact Bleak Hall. The assessments of assets as detailed in the Planning inspection report EN020027, section 11.2.6 fails to recognise the environmental impact also applies to Grade ii properties as well as Grade ii*. This requirement is detailed in NPS EN-1 (DESNZ, 2024a) section 5.9.30. The planning report indicates mitigation should be considered we are not aware of any indicated or planned mitigation, we would request mitigation should consider under grounding using HVDC and cable ploughing.	For routeing and siting, a combination of feedback together with further consideration of the most economic and efficient solution led to change to the Project design to the section of overhead line from Offton to Bramford Substation, details of which can be found in paragraphs 5.4.89 to 5.4.91 of 7.21 2024 - Design Development Report for the Project [APP-359]. In summary this change was to reduce interactions with an existing 132 kV overhead line, including the removal of additional sections of the asset to reduce cumulative impacts and technical constraints associated with crossing it multiple times. The change also reduces impacts to the equestrian business and residential amenity receptors. Furthermore, as reported within 5.1 Consultation Report [APP-066] ref no. 9-2.1062 <i>'the alignment and siting of pylons, including RG195 to RG200, reflect a careful balance between environmental, technical in addition to heritage considerations. The change between RG195 and RG200 did result in avoiding impacts on the equestrian business but it also moved the alignment further away from residential properties along Ipswich Road.'</i> In terms of the use of undergrounding in this area, 5.1 Consultation Report [APP-066] ref 9-4.197 states that the Applicant does <i>'not consider the Project at RG183 and RG200 would meet the thresholds established by paragraphs 2.9.14 and 2.9.23 of NPS EN-5'</i> to necessitate undergrounding. Heritage – The Applicant has previously responded to concerns regarding Bleak Hall; the respondent is referred to 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] (pages 60, 157, 158).

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		We wholly support the report submitted by [redacted] and the harm to Heritage assets and the pylons should not pass close to us. <i>[Applicant Note: please see original comment in REP5-300 for Pylons East Anglia Historic Environment submission – it is not replicated in this document as it was submitted at Deadline 4 in REP4-369].</i>	
REP5-301	John Stacey	Having reviewed the latest documents submitted by National Grid (NG), I cannot identify a response to my question regarding the speed limit for the haul road, which I raised during the Issue Specific Hearing.	The Applicant responded to this matter in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]. Paragraph 5.7.9 of 7.3 Outline Construction Traffic Management Plan [Revision E] details that speed limits will be enforced on all construction haul roads and access tracks. The 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.
REP5-301	John Stacey	One of our principal concerns is dust, particularly from the haul roads, which will be approximately 200 m from our house. In our experience, dust can easily travel 200 m. It is noted that one of the proposed mitigation measures for dust is contained within: REP-166 Document: 7.2 Outline Code of Construction Practice Appendix D – Outline Dust Management Plan (Clean Version) However, it is unclear whether the use of the haul road forms part of the construction process covered by this document. The document is also unclear regarding the measures that are proposed. For example, under visual assessment it states: "This should include regular dust soiling checks of surfaces such as street furniture and cars within 100 m of the site boundary." In relation to monitoring, it states: "Monitoring would be undertaken either at the Order Limits of the site closest to receptors or, for larger areas, at locations upwind and downwind of the prevailing wind direction." Does this mean that checks will be undertaken daily, or more frequently, outside the draft Order Limits? If so, this could result in monitoring activities affecting private property.	Use of the haul roads is a construction activity and is done so to minimise the construction impact on the local road network, including communities located on the local road network. Checks for dust soiling are unlikely to be undertaken more frequently than daily. The frequency of checks will be responsive to the level of construction anticipated and the prevailing weather conditions. Checks would be managed with local residents so that private property is not unnecessarily affected.
REP5-301	John Stacey	Page 23 – Section 7.2 Dust Mitigation Measure "Impose and signpost a maximum speed limit of 15 mph on surfaced roads and 10 mph on unsurfaced haul roads and work areas." Dust arising from the haul road remains one of our key concerns, as it is likely to be used throughout much of the construction period and may only be removed once the project becomes operational. In this case, any monitoring of dust levels would need to take place outside the draft Order Limits and could result in an excessive intrusion into private property. There is also potential for crops adjacent to the haul roads to be affected, with yields reduced as a result of dust settling on leaf surfaces.	The mitigation measure raised is one of a suite of measures to minimise the generation and transport of dust. Any proposed monitoring would be managed with local residents so that private property is not unnecessarily affected. The construction dust assessment- in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] focuses on dust soiling, human health and ecological impacts. The assessment concluded that with the appropriate implementation of mitigation measures there would likely be no significant effect from construction dust.
REP5-301	John Stacey	Payment Rates for Landowners	These payments are in line with National Grid's Land Rights Strategy and Payments Schedule for Assets, which has been developed to provide a

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		One question that remains unanswered is how NG has arrived at the following payment rates: A one-off payment in respect of permanent rights per tower and associated oversail, including access rights: • Permanent grassland – £6,000 (or a proportion based on land ownership) • Arable land – £8,000 (or a proportion based on land ownership) These figures are considerably lower than those being offered by EirGrid to landowners affected by its North–South Interconnector project. EirGrid is offering an upfront payment of €43,000 for pylons and €140 per metre for power lines. In addition, there is a minimum payment of €8,000, and landowners may seek further compensation within six years. By comparison, the payments being offered by NG are extremely low. For example, if a line crosses 40 m of land, the payment offered would be approximately £500.	consistent, transparent and proportionate framework for voluntary acquisition of land rights and is reviewed on a regular basis. National Grid is confident that the payments set out in its Land Rights Strategy and Payments Schedule for Assets are extremely competitive in comparison to the likely compensation that may be awarded on a statutory land compensation basis. The pylon payments are based on a capitalised sum (recognising the in perpetuity nature of the agreement) and use similar principles to the annual wayleave payment rates which take into account elements such as yield and input losses, time loss and disturbances caused to the farming operation of the land. The payments in respect of permanent rights for towers and overhead lines provide consistency in payments made to obtain land rights, and ensures all landowners are treated fairly and equally, and in accordance with the expectations of existing legislation.
REP5-301	John Stacey	We strongly agree with BDC [Braintree District Council] position [on working hours], if the hours are as planned in the DCO our human rights could be affected.	Details of measures to be taken during the construction process to protect Health and Wellbeing are set out in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision B]. Measures to manage noise are described in detail in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. 7.2 Outline Code of Construction Practice [Revision F] includes specific mitigation measures (Table 6.1) relating to noise and vibration to ensure that adverse impacts on sensitive locations are avoided. Monitoring of noise levels at locations typically agreed with local authority Environmental Health officers (to whom the results will be required to be provided) will be undertaken during all construction activities, including those undertaken during extended hours of working.
DREP5-301	John Stacey	We await with interest the visualisation for the worst case scenarios [under ISH 2 Hearing Action Point 25] and the visualisations in EP4-151 Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment are not acceptable.	8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] provides the Limits of Deviation (LoD) visualisations for three residential properties included within 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134]. These are West Ford Farm Cottage (coded E7 in the Residential Visual Amenity Assessment (RVAA)) and Whiteheads Farm (coded E8), as requested by Braintree District Council, and Windmill House (coded F10). To provide consistency with the wireline visualisations shown in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134], the LoD visualisations for these three residential properties have been prepared in the same format and location as those in that document. As set out in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] and 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196], the LoD visualisations provide a proportional approach taking into account the potential longitudinal, lateral and vertical change within the LoD, They illustrate the following information, overlain on the wirelines for these properties as shown in

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			6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134]: • A dashed blue line runs along the ground (where they are not masked out by terrain) 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 green 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 green dashed line representing height, is based on an average height of all pylons within the field of view of the viewpoint, plus 6 m • Silhouettes of those pylons that would be visible up to approximately 1,200 m from the viewpoint are shown in positions at the extents of the dashed blue line (i.e. the LoD closest to the dwelling), should they be moved perpendicularly from their currently proposed location. Whilst the pylon locations shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109] are considered the most likely route to come forward, it is accepted that the locations of the pylons could theoretically move laterally, longitudinally and increase in height within the LoD in different ways to that shown within 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]. It is not considered proportionate, however, to provide multiple illustrations to demonstrate the many possible permutations that could occur. Instead, it is considered that the visualisations shown in 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] present the reasonable 'maximum visibility' scenario.
REP5-301	John Stacey	<i>Document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3</i> <i>Response to Braintree District Council (REP3-090) Pages 177–178 – Paragraph 3.2.2</i> National Grid's response states that construction noise has been assessed on a worst-case basis and that movement of pylons within the Limits of Deviation (LoD) would not result in significant adverse effects. However, the response relies heavily upon assumptions regarding future mitigation measures and detailed contractor assessments. Whilst NG states that no significant adverse effects have been identified, it remains unclear how this conclusion can be reached with certainty when the final locations of works have yet to be determined. The response also relies on the assumption that noise levels can be reduced through mitigation and, where necessary, by applying temporal restrictions. This does not provide reassurance that the actual impacts experienced by nearby residents will reflect the assessments currently presented.	The effectiveness of noise mitigation measures was addressed at Issue Specific Hearing 2, as summarised in 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302], Agenda Item 4.1. The Main Works Contractor(s) are required to employ Best Practicable Means and good working practices by commitment NV01 of 7.2 Outline Code of Construction Practice [Revision F]. Mitigation, including temporal restrictions where required, will be agreed with the relevant Local Planning Authority, secured through commitment NV05 within 7.2 Outline Code of Construction Practice [Revision F], and through the Noise and Vibration Management Plan secured by Requirement 4 of the 3.1 Draft Development Consent Order [Revision F].

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REP5-301	John Stacey	<i>Document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3</i> <i>Response to Braintree District Council (REP3-090) Pages 178–179 – Paragraph 3.2.4</i> Braintree District Council correctly identifies that the Limits of Deviation allow movement of pylons and construction areas within the Order Limits. Whilst NG refers to various practical constraints, these constraints are not secured within the DCO and may change as the project progresses through detailed design. As a result, there remains a risk that works could ultimately be located closer to Noise Sensitive Receptors than assumed within the Environmental Statement, leading to greater impacts than those currently predicted.	The potential for pylons to be located closer to receptors within the Limits of Deviation (LoD) has been thoroughly considered by the Applicant in relation to construction noise and vibration. There are no locations where pylons could be constructed where residual significant adverse effects would occur. In fact, pylons could be constructed at much shorter distances than the closest point of the LoD and, with appropriate mitigation and temporal restrictions, not cause a significant adverse effect. As such, although there is potential for noise levels to increase due to shorter distance between works and receptors from movement within the LoD, the outcome of the assessment would not change. All works, including consideration of any movement within the LoD are subject to the commitment to employ Best Practicable Means and good working practices by commitment NV01 of 7.2 Outline Code of Construction Practice [Revision F], with approval by the relevant Local Planning Authority secured through commitment NV05, and through the Noise and Vibration Management Plan secured by Requirement 4 of the 3.1 Draft Development Consent Order [Revision F].
REP5-301	John Stacey	<i>Document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3</i> <i>Response to Braintree District Council (REP3-090) Pages 178–180 – Paragraph 3.2.5</i> National Grid states that a review of potential pylon movement within the Limits of Deviation was undertaken and that no locations were identified where significant adverse effects would arise in practice. However, this review has not been made available for independent scrutiny. Consequently, affected parties are unable to assess the methodology used, the assumptions applied, or the validity of the conclusions reached. The fact that twelve locations were identified where movement within the Limits of Deviation may result in residual significant adverse effects from construction noise demonstrates that this issue cannot simply be dismissed. Whilst NG subsequently concludes that practical constraints would prevent such impacts occurring, the evidence supporting this conclusion has not been provided.	Irrespective of the practical constraints at those specific locations, as outlined in the response above, significant adverse effects can be avoided irrespective of the distance between works and receptors with appropriate measures in place. Those measures are secured by commitments NV01 and NV05 of 7.2 Outline Code of Construction Practice [Revision F] and will be subject to agreement with the relevant Local Planning Authority prior to the start of works by commitment NV05 and through the Noise and Vibration Management Plan secured by Requirement 4 of the 3.1 Draft Development Consent Order [Revision F].
REP5-301	John Stacey	<i>Comments on Response from National Grid to My Submission (J Stacey) REP4-301</i> National Grid states that there is limited scope to move TB98 further because of electrical clearances, safety requirements and span lengths. Previously, however, National Grid justified the current alignment on the basis of the Holford Rules and the requirement for an additional angle pylon. The justification now appears to rely primarily upon span lengths. This is difficult to understand, as moving the alignment out of the horse paddock would only require an additional 20–30 m of route length. The approximate span lengths are: • TB94 to TB95 – approximately 430 m • TB95 to TB96 – approximately 430 m • TB96 to TB97 – approximately 390 m • TB97 to TB98 – approximately 355 m	The Applicant responded to Mr Stacey's concerns at CAH2 to explain why the route is as shown at this location and why the pylons cannot be located further from the property and horse paddock. The Applicant notes there is no single figure that serves as a target of span length, as each span must adhere to a variety of factors, including relevant safety clearances, restrictions in terrain topography, pylon height and strength regulating the distance of adjacent spans. The respondent's premise that there is scope to move particular pylons where spans appear shorter is incorrect – it cannot be inferred that spans of shorter length can simply be extended where they appear to be relatively shorter than other spans. 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 Submissions to Compulsory Acquisition Hearing 2 [REP4-301] pages 13 and 14 for further details on routeing and siting.

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		- TB98 to TB99 – approximately 320 m - TB99 to TB100 – approximately 320 m To avoid the horse paddock, TB96, TB97 and TB98 would need to be moved further west. This would increase the span lengths between TB95 and TB99; however, these spans would still not be excessive and would remain comparable to, or shorter than, other spans along the route. In addition, the landowner affected by TB94 has requested that this pylon remains further to the west.	The Applicant and our delivery partners (the Great Gird Upgrade) at detail design will seek to microsite the pylon further should it be suitable; additionally we will seek to develop a construction methodology such that the haul road and pylon work area does not encroach into the horse paddock as per aspiration commitment (See Additional Detailed Design Request reference ADDR 50 in Appendix F).
REP5-301	John Stacey	National Grid stated that a meeting would take place on 12 May 2026 to address a number of outstanding issues, including the relocation of horses and practical matters relating to crossing points. UKPN was also expected to attend. That meeting has now taken place. My understanding was that the meeting would provide information regarding: - Crossing points for the farm; - National Grid's proposals for managing the impact on our horses; - The possibility of moving the red line boundary, pylon and haul road further west to avoid the horse paddocks; - Management of land adjacent to the draft Order Limits; - The location of SuDS features; - Speed limits on haul roads; - Tree replacement proposals; - Biosecurity measures; and - Badger set protection. These were among the issues for which we expected clear answers. Unfortunately, no substantive information was provided. These matters had already been discussed with National Grid's agent on 12 February, and we had been led to believe that answers would be forthcoming. As of 8 June, we still have not received answers to these questions. This is not acceptable given that National Grid has had approximately four years to develop its proposals.	The Applicant met with the landowner and his agent, and UK Power Networks and their agents, on 12 May 2026. The meeting involved a walk around the land holding and a detailed discussion on a number of points. The landowner and their agent were advised on site that a number of queries can be answered with reference to the 7.2 Outline Code of Construction Practice [Revision F] and documents which are publicly available on the planning website. The Applicant has responded to a number of these points via email on 23 June 2026 and is awaiting feedback from the landowner's agent.
REP5-301	John Stacey	<i>Document: 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 on my submission REP3-159, REP-298– Pages 331–332</i> Construction Noise National Grid states that construction noise is assessed against fixed thresholds in accordance with BS 5228 rather than against background noise levels. However, National Grid has also assessed the magnitude of effect at Jasmine Cottage, where it predicts an increase in noise levels of 11.4 dB arising from construction traffic. This increase is described as a large adverse	Construction traffic noise is assessed against different criteria to construction noise, with construction traffic noise principally being assessments relative to a change in noise level. The methodologies and criteria are stated in Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].

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		impact. It is therefore evident that the assessment considers more than simply fixed threshold levels.	
REP5-301	John Stacey	<i>Pages 335–336 Residential Visual Amenity</i> National Grid acknowledges that, under a worst-case scenario, a pylon could be located approximately 75 m from our garden and approximately 100 m from our house. Given that the pylon could be almost 60 m in height, compared with a dwelling of approximately 12 m in height, it is difficult to understand how National Grid can conclude that there would be no breach of the Residential Visual Amenity Threshold. National Grid states that [redacted] would experience views of the project from only two elevations. This is incorrect. [Redacted] would. would experience views from three elevations, not two as stated within the assessment. In reality, the only room within the house that would not have views of the project is the bathroom. National Grid recognises that there will be a high magnitude of visual change. It is therefore important to understand whether this assessment was undertaken on the basis that the line and pylon could potentially be located approximately 100 m from the property, with the nearest pylon approaching 60 m in height. National Grid's response refers to TB98 as reaching a height of 53.84 m AOD. It is concerning that National Grid appears not to acknowledge that, under the permitted Limits of Deviation, a pylon could potentially be approximately 6 m taller than this figure.	Table A13.4.55 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 1 [REP5-126] acknowledges that the assessment has been carried out with consideration for the worst-case scenario. This being the raising in height (by 6 m) and movement of the current nearest pylon (TB98) and overhead line closer to the property of Whiteheads Farm within the Limits of Deviation. In this scenario, pylon TB98 would be situated approximately 90 m from the building, and 70 m from the garden boundary. Table A13.4.55 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 1 [REP5-126] sets out our considerations upon why there would be no breach of the Residential Visual Amenity Threshold at the property of Whiteheads Farm. As presented in Table A13.4.55 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 1 [REP5-126] the Residential Visual Amenity Assessment acknowledges that the property of Whiteheads Farm would experience visibility of the Project in three directions.
REP5-301	John Stacey	<i>REP4-151 Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment – Tracked Changes Version – Part 2</i> The image presented on page 27 is wholly unrealistic. It suggests that it is possible to see approximately 80 pylons, with the furthest located more than 15 miles away. This does not present a realistic representation of the visual experience from the property. This final image, shown at one of the consultation events, whilst not entirely accurate in relation to vegetation, at least demonstrated the full scale of the height difference between the proposed pylons and the surrounding trees. <i>[Applicant Note: please see original representation for images – they are not replicated in this document].</i>	The visualisations set out in 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 – Part 1 [REP5-205], Part 2 [REP5-206], Part 3 [REP5-207] and Part 4 [REP5-208] provide a series of computer generated visualisations to supplement and provide further context to the wireline visualisations presented in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment - Parts 1 to 5 [REP5-126 to REP5-134]. 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. Trees and hedgerows were 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.
REP5-301	John Stacey	<i>REP4-170 Document: 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan</i> Section 4.4.7 sets out the information that will be included within a Section 61 application, including: - Proposed construction methods and plant; - Working hours and any justification for departures from core hours;	This is noted. The level of detail described is typical of Environmental Statement stage assessments, where a proportionate assessment is undertaken based on reasonable worst-case assumptions. Commitments NV01 and NV05 of 7.2 Outline Code of Construction Practice [Revision F], secure a framework requiring the Main Works Contractor(s) to undertake further detailed assessments, identify appropriate mitigation, and develop monitoring proposals. These measures are secured through the Noise and Vibration Management Plan, which is required to be submitted to and approved by the relevant Local Planning Authority under Requirement 4 of the 3.1 Draft

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		• Programmes of work identifying the duration and location of significant noise- and vibration-generating activities; • Predicted noise and vibration levels; • Mitigation measures; • Monitoring proposals; and • Notification procedures for affected residents and stakeholders. Whilst these commitments are noted, they reinforce the fact that many important details regarding construction impacts, monitoring arrangements and mitigation measures have yet to be finalised. As a result, affected residents are currently being asked to assess the impacts of the project without access to information that will ultimately determine the extent of those impacts in practice.	Development Consent Order [Revision F] , prior to the commencement of works. This ensures that construction impacts, mitigation measures and monitoring arrangements are appropriately defined and agreed before works begin.
REP5-302	Joseph Long	Bad planning [sic], Better options, save the countryside, off shore such as other country's. The project is poorly planed and much better options available, we do not need to destroy countryside especially when so much natural landscape is under attack from housing. Other options have not been look at properly or just written off. If other nations such as Norway have made a full off shore grid why can we not? Protect natural wildlife and countryside and do the same off shore, countryside that needs to be protects for the next generation	The Applicant acknowledges the objection to the Project. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
REP5-303	Karl Owen	<i>[The Applicant has identified that many points raised in this detailed submission are similar or expansions to points made in previous submissions by Mr Owen. Therefore the Deadline 5 submission is summarised in this document to avoid repetition. Some points of detail are extracted for specific response where appropriate]</i> <i>1.Introduction and Standing</i> Summary of IP position and household <i>2.Systematic Breach of the Holford Rules</i> • Concern that NPS EN-5 and NG's own guidance is not being complied with in requiring Applicants to embody the Holford Rules as the established framework against which routing decisions are assessed • Concern that Holford Rules 2 and 4-7 are not complied with in respect of the AP's land	The Applicant's position is that the respondent has misunderstood the application of the Holford Rules. The Rules provide guidance and their wording recognises that different locations require a different balance to be struck. There is nothing in the wording of the Rules that requires all Rules to be complied with. The Applicant notes that, following a meeting on-site with the respondent, various aspects of the Project were changed including routing of the overhead line and position of the haul road to benefit the respondent.
REP5-303	Karl Owen	<i>3.Failure to Discharge the Public Sector Equality Duty — Equality Act 2010</i> <i>4. Impact on the Wider Household — Four Children and Seven Dogs</i> <i>7. The Annexe — A Reasonable Adjustment Under the Equality Act</i>	The Applicant notes Mr Owen's response in relation to these matters. Given the nature of the issues raised, it is considered appropriate that ongoing engagement takes place with Mr Owen to understand further detail. Following an initial meeting prior to the Compulsory Acquisition Hearing on Wednesday 24 June 2026, the Applicant has subsequently been in contact with Mr Owen regarding next steps and a meeting on site has been agreed for 7 July 2026.

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		- Detailed account of household composition and potential effects of the Project on respondents' family and dogs. Particular concern raised regarding Public Sector Equality Duty under Section 149 of the Equality Act 2010. - Request for ExA to require evidence of a equality impact assessment carried out following National Grid site visit and to confirm whether the assessment took place prior to decision to move pylon closer to the IP property was made - Request for an annexe to the east of the property to be considered as reasonable and necessary mitigation in order to address particular potential impacts to one member of the household [medical details redacted]. - Concern that dogs owned by the household are at risk from construction traffic. Request that the Examining Authority require the Applicant to address dog safety specifically in its construction management plan, including fencing, signage, and speed restrictions on any haul route adjacent to the property.	
REP5-303	Karl Owen	<i>5. Construction Traffic, Road Safety and the Bacton Gas Pipeline</i> [redacted] is accessed via two single-track public highways country lanes, Lambert's Lane, and Stonham Road. Lambert's Lane becomes Stonham Road at a bend; Wimble Lane (also designated as U5239) spurs off at that same bend; our home lies along Wimble Lane which is a no-through road. These roads form our only route of vehicular access. There is no alternative. The household currently makes a minimum of ten vehicular journeys per day along these roads, rising to a minimum of sixteen from August 2026 when all four children are at home. The Applicant's proposals include the use of Lambert's Lane and parts of Stonham Road as haul routes for up to three years — roads entirely unsuited to the volume and weight of construction traffic of this scale. At the bend where Lambert's Lane becomes Stonham Road, the Bacton high pressure gas pipeline runs underground — a pipeline originating on the Norfolk coast that supplies gas to London, passing within approximately 50 metres of [redacted] — a [redacted]. The proposed pylon route crosses this pipeline in the adjacent field to the west. The simultaneous presence of a 400kV overhead line crossing a high pressure gas pipeline, in close proximity to a public road and an active construction haul route, raises serious safety questions requiring specific and transparent consideration by the Examining Authority. I ask the Examining Authority to confirm that the Health and Safety Executive has been specifically consulted on this interaction and that its response is on the examination record, and to secure a legally binding resident access protocol,	The Applicant notes the concerns but would like to clarify that neither Stonham Road, Lambert's Lane or Wimble Lane are proposed as Primary Access Routes or construction haul road routes. The construction access is routed from south to north broadly following the route of the overhead line for which it serves. There is a crossover bellmouth located to the west of the proposed overhead line at span RG138 to RG139. All crossover bellmouths on the Project have undergone a Road Safety Audit and have been designed in accordance with the Design Manual for Roads and Bridges; these have been presented to, and agreed with the Local Highway Authorities. To confirm the extent of the Order Limits in this location along the public highway is to encompass visibility splays, but Construction HGVs will only cross Stonham Road and Lambert Lane Both the overhead line and haul road in this location were changed to respond to statutory consultation feedback (including a meeting with the respondent on site), see paragraphs 5.3.10 to 5.3.12 of 5.15 Design Development Report [APP-122]. In summary the overhead line was moved from the east to the west of the residential property on Wimble Lane to avoid conductor oversail of the curtilage and to increase distance from the property to the overhead line. Additionally this change facilitated a modification to the temporary access arrangements between RG134 and RG137 to respond to feedback requesting it to be close to field boundaries and to utilise an existing track where possible, noting some deviation is required to maintain highway safety requirements at the crossover bellmouth location. The change to alignment also removed the potential conductor oversail of woodland at RG137 and enabled a modification of the UK Power Networks underground diversion works to further reduce ecological effects. In relation to health and safety and proximity of the gas pipeline to the roads and the proposed works, the Applicant is aware of the gas pipeline and as such pylons and work areas have been positioned to avoid it and where the haul road must cross it, it does so at a perpendicular angle. The Applicant and its contractors shall adhere to relevant Health and Safety Executive and National

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		reinstatement bond, and guaranteed access arrangements as conditions of consent.	Grid specific legislation, policy and guidance when constructing, operating and maintaining the Project. Furthermore, we are in continued engagement with National Gas Transmission plant protection team. The Applicant acknowledges the need to adhere to the relevant legislation, guidelines, codes of practice, and international standards for the Project. Necessary precautions have been taken, and these addressed comprehensively throughout the planning and execution phases of the Project. For further details on how the Applicant and its delivery partners account for gas pipelines in proximity to the works see ref no. 9-9.37 in 5.1 Consultation Report [APP-066]. Additionally, the Health and Safety Executive was consulted and details of such can be found in ref no. 9-2.100 in 5.1 Consultation Report [APP-066] in relation to three Major Accident Hazard sites in proximity to the Project. We do not oversail any of them and have consulted with each of them.
REP5-303	Karl Owen	<i>6. Severance from Ancient Woodland and Loss of Essential Heating Fuel</i> - Concern that access to ancient woodland known as The Thickett is to be severed by construction and will prevent access to the sole fuel source for the family (firewood for wood burner). - Request that status of The Thickett confirmed in Applicant EIA and a specific mitigation plan provided securing right of access of AP during construction. If access not provided, request for secured funding for alternative heating solution during construction.	This party is a Category 3 occupier of a property outside the Order Limits. He is not a landowner within the Order Limits and no rights are being sought. In regard to potential access concerns the Applicant will review accommodation works as required and physically possible in order to facilitate access when needed to the land. This will form part of an ongoing conversation with the party as detailed design is progressed.
REP5-303	Karl Owen	<i>8. Request for Meeting with the Applicant</i> Request for ExA to facilitate meeting with Applicant to discuss and resolve above matters prior to end of Examination.	The Applicant has reached out to Mr Owen and spoken to him ahead of the Compulsory Acquisition Hearing on Wednesday 24 June 2026. The Applicant has followed up by email regarding next steps and a meeting is scheduled for 7th July 2026
REP5-251	Lower Thames Crossing Project	Protective provisions In previous examination submissions, NH LTC confirmed to the Examining Authority that it was actively engaging with the Applicant in relation to the interface between the consented LTC project and NGET's proposals. This engagement is continuing but it is becoming apparent that a detailed agreement between the parties may not be reached before the end of examination. As a result, NH LTC is now contemplating submitting into the examination protective provisions in favour of the Lower Thames Crossing Project which, in order to safeguard its position, it would invite the Examining Authority to include in its recommended DCO should the Norwich to Tilbury project be consented. NH LTC has made the Applicant aware of this and, if it proceeds with this course of action, it anticipates being able to share a draft of the protective provisions with the Examining Authority at Deadline 6 on 7 July 2026. Either way a further update will be provided at that time.	The Applicant intends to progress Heads of Terms for a Side Agreement in parallel to the Examination. The intention is to complete the Side Agreement by Deadline 7, albeit given the complexity of the issues, that may or may not be possible. The Applicant will work to a timetable that aims to achieve resolution of the issues satisfactorily before the end of the Examination. The Applicant notes NH LTC's comments regarding protective provisions, and their intention to submit draft provisions at Deadline 6. The Applicant also notes NH LTC's intention to submit their proposed amendments to Norwich to Tilbury's Development Consent Order (DCO) at Deadline 6. The Applicant will review this drafting, and if agreement cannot be reached between the parties, submit its own proposed Protective Provisions at Deadline 7. Engagement between the parties' respective legal teams on these matters is ongoing. This includes continued discussions on the side agreement, protective provisions and DCO drafting.

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		NH LTC is also discussing with the Applicant amendments to the Norwich to Tilbury DCO which, again, NH LTC expects will be communicated to the Examining Authority at Deadline 6.	
REP5-253	National Highways	BOOK OF REFERENCE SUBMITTED AT DEADLINE 4 2.1. As the Examining Authority are aware, the Book of Reference includes approximately 154 plots of land owned or occupied by NH in respect of which compulsory acquisition powers are sought. Those plots constitute land acquired by NH for the purpose of maintaining its statutory undertaking and are subject to section 127 of the Planning Act 2008. NH have undertaken a detailed plot-by-plot review and have discussed this with the Applicant. It is noted that three new NH interests have been added to the revised Book of Reference submitted at Deadline 4. NH are reviewing these plots and will liaise with the Applicant. 2.2. Within the land over which rights are sought, there are plots where NH's ownership is historic and the relevant roads have been detrunked, with ownership having passed to the local highway authority but the transfer not yet been registered at the Land Registry. The Applicant acknowledged that it would update the Book of Reference accordingly. Despite this acknowledgement, the Book of Reference submitted at Deadline 4 does not contain this update. 2.3. In addition, NH has consistently requested the removal of operational highway land from the Book of Reference for the reasons set out below. Discussions in relation to all items above are on going.	Of the 154 identified plots, the parties have classified these as follows: • Plots to be removed from 4.3 Book of Reference [Revision E] because they have been de-trunked. The ('De-trunked Plots') • Plots of land over which Class 1 land take are sought within the adopted Strategic Road Network (for the purposes of highways works). The ('SRN Adopted Highway Plots') • Plots identified for acquisition of rights only for subterranean easement below the highway and Plots identified for acquisition of rights only for oversail over the highway. The ('OHL and UGC Plots') • Plots of land over which Temporary Possession powers were sought. The ('Temporary Possession Plots') • Plots of land which interact with the Lower Thames Crossing (LTC) proposals. The ('LTC Plots'). It is proposed that these plots are excluded from the protective provisions for National Highways and dealt with in the protective provisions in relation to the LTC Development Consent Order With reference to the 3 new plots added to the 4.3 Book of Reference [Revision E] at Deadline 4, the Applicant will continue to communicate with National Highways directly regarding changes to the underlying land plot numbers and/or spatial extents, where these land plots concern National Highways land interests. The Applicant is scheduled to contact National Highways regarding any further changes to the land plot numbers and/or spatial extents in respect of Deadline 6. 2.2 National Highway's interest in the de-trunked plots will be removed from the 4.3 Book of Reference [Revision E] subject to National Highways sign-off on a plot-by-plot basis. The Applicant and National Highways are in regular communication regarding the de-trunked plots, with a view to conclude this matter imminently and by the end of the examination. As set out below, the Applicant will include protective provisions in the Order which prevent the Class 1 land acquisition of any of the SRN adopted highway plots within the operational extent of the SRN, without National Highways' consent (see 'Lands' section towards the end of the protective provisions for National Highways in the Deadline 6 version of the Development Consent Order ((3.1 Draft Development Consent Order [Revision F])). National Highways have explained that they do not have registered title to or absolute certainty about all extents of adopted highway within the SRN, and accordingly, in order to ensure that as a fall-back position the Applicant could potentially acquire and dedicate any areas of disputed adoption/owner which are required for the highways works, it seems safest to keep these plots within the compulsory acquisition powers in the Order but provide that they cannot be acquired unless National Highways want them to be, which would only arise to rectify any title issues and ensure Project delivery.

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REP5-253	National Highways	Compulsory Acquisition Is Not Necessary or Proportionate 2.4. Notwithstanding the on-going discussions, NH's position remains that compulsory acquisition of NH's operational land is not necessary or proportionate. NH's detailed review demonstrates that the proposed permanent land take falls into two categories where compulsory acquisition is not required. First, land which is NH's managed highway required for highway works or widening — such works are authorised by the DCO subject to protective provisions ensuring NH approves the detail of those works. Second, land owned by NH required for Strategic Road Network ("SRN") widening which does not need to be acquired only to be transferred back to NH; access can be granted through protective provisions and by agreement. 2.5. The plots in both categories are either part of the SRN or land which NH owns that will become part of new SRN. Their inclusion in the Book of Reference is not necessary or proportionate as required by the Planning Act Compulsory Acquisition Guidance.	2.4 - In relation to the first category identified i.e. class 1 land acquisition within the extent of the adopted SRN, the Applicant has confirmed their position on this above. In relation to the second category, we are not aware of any plots where highways works are proposed in land identified as owned by National Highways which is outside the adopted limits of the Strategic Road Network but if there were this would be caught by the same restriction in the protective provisions on the acquisition of Class 1 land, i.e. it can only be acquired with the consent of National Highways and is necessary to ensure that the highways works required for the Project can go ahead but at all times in accordance with National Highways' approval. 2.5 – The inclusion of plots in both categories above in the 4.3 Book of Reference [Revision E] is both necessary and proportionate to ensure that all land required for the highways works and highways widening works is within either the Applicant's or National Highways' control. The fact that there will be no compulsory acquisition powers exercised in Class 1 land take without National Highways' consent means that they control any Class 1 land take within the Strategic Road Network (SRN), such that these powers will only be capable of being used by the agreement of National Highways where an issue arises over title or highways boundaries.
REP5-253	National Highways	NRSWA Provides Adequate Statutory Powers 2.6. In relation to the acquisition of rights, the Applicant has statutory powers under section 50 of the New Roads and Street Works Act 1991 ("NRSWA") to install, maintain and repair apparatus in a public highway, including carriageway, verge and footway. Section 105 of the NRSWA confirms that references to "in" a highway include works, apparatus or other property under, over, across, along or upon it. The Applicant can therefore undertake the overhead line works without compulsory acquisition, and the inclusion of these plots is not necessary or proportionate. 2.7. At the Compulsory Acquisition Hearing, the Applicant indicated that the issue of use of powers under section 50 of the NRSWA remains outstanding and that further discussions are required. As indicated above, this remains the case. 2.8. To the extent that any underground cable crossings may require an easement, NH is prepared to grant that by consent. Compulsory acquisition is not necessary.	2.6 and 2.7 It is the Applicant's understanding that National Highways have moved away from their initial assertion that the Applicant be given a licence under s50 of NRSWA. Licences under s50 of NRSWA are subjected to Schedule 3 paragraph 6(1) c, which provides that a licence under s50 is terminable on three months' notice in the event that National Highways consider necessary for the purpose of the exercise of its statutory function. This is unacceptable to the Applicant, who will not be able to divert their apparatus on three months' notice, given the design, consenting, land rights and construction implications relevant to diverting apparatus of this nationally significant nature. Accordingly, the Applicant seeks permanent land rights as acknowledged in National Policy Statement (NPS) EN-5 which is very clear that this is a multi-billion pound critical national priority network project, where overhead line is supported as the starting point and the NPS is clear that permanent rights should be sought. Government could have added text to say that NRSWA could displace or substitution for the strongly preferred arrangements, it did not. - NPS EN-5 states: '... <i>permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the nation's net zero goals</i>' – paragraph 2.6.4. However, the Applicant understands that National Highways have changed their position and are now asserting that provisions other than s50 NRSWA are applicable. The Applicant will therefore respond to these in their post hearing written submissions following Compulsory Acquisition Hearing 3. 2.8 The Applicant acknowledges that National Highways have confirmed that they are happy with the principle of the voluntary grant of an easement in the subsoil below the Strategic Road Network and will seek to negotiate the same

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			with National Highways. Any such voluntary easement needs to provide the permanent land rights to retain the cable easement in accordance with NPS EN-5 (as referred to above). However, until the terms of an easement are agreed and either the easement is in place or an option for an easement, the Applicant requires compulsory acquisition powers as a fall back to ensure that the Project is deliverable and not delayed. Accordingly at this stage it is not correct from the Applicant's perspective to say that compulsory acquisition is not necessary.
REP5-253	National Highways	Serious Detriment to the SRN 2.9. Compulsory acquisition of NH's operational land could cause serious detriment to its undertaking. NH controls the freehold beneath the highway to the centre of the earth and to the heavens above, held for the benefit of its statutory undertaking. Without appropriate protections, any damage to the SRN or highway estate would require funding to rectify that is not within NH's budget, with no recourse to public funding for emergency works. It is not acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying the statutory protections available to NH.	2.9 We dispute National Highways' overarching assertion that they own the freehold beneath the highway to the centre of the earth and to the heavens above, which is sited without authority. It is commonly acknowledged that in the absence of contrary evidence that the ad medium filum rule would apply to the subsoil ownership of the highway (below the 'top two spits'), such that the subsoil of highway is owned to the mid-point of the highway by the adjoining land owners. Obviously any such assumption can be refuted as a result of registered title ownership or the subsoil or other unregistered evidence of ownership. National Highways' control above the highway extends as far as relevant for the functional highway/zone of ordinary use (LB Southwark v TfL). There is no intention to disapply the statutory protections of the New Roads and Street Works Act 1991 (NRSWA) by the Applicant, however notwithstanding compliance with these requirements in relation to the functional highway boundary the Applicant needs both rights in the subsoil for underground cables beneath the highway (the principle of which is accepted by National Highways) and a permanent right to oversail the highway by easement above the functional highway boundary. This is not in itself in conflict with NRSWA and the parties could agree an easement or acquire compulsory acquisition powers in a way which still ensures the application of NRSWA.
REP5-253	National Highways	Relief Sought 2.10. NH respectfully requests that the Examining Authority: (a) finds that compulsory acquisition is neither necessary nor proportionate given the Applicant's existing statutory powers under the NRSWA and the availability of access through protective provisions and agreement; (b) records that NH maintains its objection until satisfactory protective provisions and a side agreement are in place. 2.11. NH remains committed to engaging constructively with the Applicant and is prepared to assist in whatever way is reasonable to ensure the Authorised Development proceeds efficiently. However, the safety and integrity of the SRN must be protected, and the statutory tests for compulsory acquisition must be met.	The Applicant asserts that compulsory acquisition (CA) powers are necessary and proportionate and are required for the reasons identified above, i.e. that acquisition of rights beneath the highway in the subsoil are required (this is not disputed by National Highways) and until such time as rights are granted voluntarily. CA powers to secure them are required. The Applicant will work with National Highways to agree a voluntary easement in the subsoil and this work is ongoing. The Applicant also asserts that notwithstanding compliance with the New Roads and Street Works Act 1991, that they require permanent rights for their critical Nationally Significant Infrastructure Project infrastructure to over sail the highway. Accordingly, the powers to CA rights are required. The powers to CA Class 1 land are also required for the reasons explained above but the Applicant agrees that these should be subject to National Highways' consent which is provided for in the protective provisions included for National Highways' benefit in the Deadline 6 version of the Order (3.1 Draft Development Consent Order [Revision F]). The Applicant notes National Highways' position in (b) and continues to seek regular engagement with National Highways to seek to resolve or narrow as far as possible the outstanding points. To the extent that it is not possible to reach full agreement with National Highways, the Applicant will submit a section 127/138 submission to address the statutory tests.

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REP5-253	National Highways	DRAFT DCO SUBMITTED AT DEADLINE 4 3.1. It is noted that the draft DCO has not been updated to address NH's concerns raised in its Relevant Representations [RR-2657] (paragraph 6), Written Representations [REP1-192] as further supplemented by its Deadline 2 comments [REP2-043] paragraph 2.5 and Table T1.2 (page 24 onwards) and nor have any amendments been made to reflect the discussion at ISH2 on 28 and 29 April [REP-343] save for the amendment to Requirement 4(1) which is welcomed (see page 2 and 4 of [REP-343]). NH's objections are not set out again to avoid repetition. NH's objections as previously stated remain.	NH's objections as previously set out are noted and have been responded to by the Applicant previously including in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] (Appendix T, including the further detail provided in Table T1.2 as well as in Table T1.1), 8.8.1 Applicant's Comments on Written Representations [REP2-029] (page 62), 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070] (pages 141 – 149) and 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] (Table 2.3, page 28). It is not clear that NH raise a new issue that requires a further additional response.
REP5-253	National Highways	COMMENTS ON LATEST STATUTORY UNDERTAKER TRACKER SUBMITTED AT DEADLINE 4 4.1. It is noted that the latest statutory undertaker tracker submitted for Deadline 4, sets out the recent meetings between the Applicant and NH. By way of an update, the Applicant shared updated draft protective provisions and a draft side agreement on 29 May. A further meeting is schedule for 18 June. NH note the comment in the tracker that "The parties are continuing to work together to resolve issues and arrange future meetings. As these protective provisions are under negotiation, the Applicant anticipates including them in the draft Order at Deadline 6". It is assumed that an updated Book of Reference will also be submitted at Deadline 6.	The Applicant confirms that updated protective provisions for National Highways will be included in 3.1 Draft Development Consent Order [Revision F] at Deadline 6. The Applicant confirms that in relation to 4.3 Book of Reference [Revision E] has been updated to remove the de-trunked plots.
REP5-260	North-West and South-West of Chelmsford Parishes Group	Summary of Applicant's Comments at ISH2 [REP4-302] - Alison Farmer Associates Report ('the AFA Report') 3. In the Recording of ISH2 Day 2, Part 5 at 55 mins in, the Applicant's barrister undertook to provide a full written response to the AFA Report. However, in their Summary of Oral Comments [REP4-302] at para. 8.3.r, the Applicant states that they have already responded to it in their Addendum to Comments on Relevant Representations – Part 2 [AS-089], pp 650-654. There is no reference to a forthcoming written response. 4. We raise this point now in case the need to respond to the AFA Report has been overlooked. The quoted pages in [AS-089] are not a response to the AFA Report. Rather, they appear to contain an outline of the Applicant's general approach to various other landscape assessments. The AFA Report remains the only detailed assessment of the relative impacts of both the Preferred Route and the east/south of Chelmsford alternative.	Heritage – The Applicant has addressed concerns regarding the churches at Little and Great Waltham in 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302].
REP5-260	North-West and South-West of Chelmsford Parishes Group	Applicants Comments on any further Information or Submissions received by Deadline 3 [REP4-298] 5. In this document, pp. 240 – 245, the Applicant provides some further comments on the Group's proposals for alternative alignments to the east and south of Chelmsford. They refer back to the Applicant's Response to First Written Questions [REP3-	The Applicant does not consider that providing further detail is necessary given that its position is that this alternative has been carefully considered and is less preferred because of constraints. These constraints have been documented through the documentation produced in support of the consultations and we see no purpose to identifying parts where the route is possible when this is not being taken forwards.

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		074], ALT1.6 (p.72) in which the Applicant stated of the east/south Chelmsford route: ‘Whilst conceptually possible in certain sections there are also locations where there is no reasonable solution to secure a route for either 400 kV cable or overhead lines.’ This position is restated in these further comments, citing a ‘lack of sufficient space to safely provide a route for an undergrounded 132kv connection, a new 440 overhead line connection and, in a number of places temporary 132kv and 440kv diversions ...’ 6. However, there is a lack of detail and evidence to support these assertions. For instance, in which sections is this alternative alignment ‘conceptually possible’ and in which locations is there ‘no reasonable solution’ and why? Do these comments refer to the entirety of Corridor L – both Eastern and Western Arms, which experience quite different potential constraints – or is the Applicant referring primarily to the Western Arm containing the existing 440kv line? How are temporary diversions normally achieved where they are necessary for maintenance or to upgrade technology? Further information and detail would be helpful (particularly with accompanying maps), as this would enable a better assessment and comparison with the detailed maps in the Group’s written representation [REP1-261].	
REP5-260	North-West and South-West of Chelmsford Parishes Group	Transposition 7. The Parishes Group is grateful to the Applicant for addressing this issue. Transposition is not necessary to achieve the Group’s proposed alignment to the east and south of Chelmsford but, at the Group’s meeting with the Applicant in July 2024, it was noted that: ‘Transposition is fine in principle – and therefore a good solution to the need to cross another high voltage line. However, it is more complex in practice due to the need to preplan the necessary outage (which needs at least a year’s lead in). ‘ (Notes of meeting, Annex A, REP1-261) The Group therefore included transposition in preference to underground crossings (with cable sealing ends etc) where appropriate, on grounds of potential lower cost and with the expectation that outage requiring a year’s planning can be comfortably accommodated within the Project’s construction phase. 8. However, in these new comments, the Applicant has raised further potential issues with transposition in addition to planned outage. These are: access to circuits to maintain the security of the system; replacement of protection systems and movement of reactive compensation; reconductoring and potentially pylon changes. It would be helpful to have more detail about these. For instance, are these normal features of transposition (which we understand is a common occurrence to upgrade to new technology) or not?; how likely is it that existing pylons would have to be replaced (bearing in mind that both sets of pylons	The Applicant does not consider that providing further detail is necessary given that its position is that this alternative has been carefully considered and is less preferred because of constraints. These constraints have been documented through the documentation produced in support of the consultations. We responded conceptually regarding transpositions but do not have available a design solution that allows us to provide more information as this alternative was not progressed to this level of detail.

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		would be designed for 440kv lines)?; in broad terms, how does the cost of transposition compare with the cost of an underground crossing of an existing 440kv line?	
REP5-260	North-West and South-West of Chelmsford Parishes Group	Identified Valued Landscape west of Broomfield 9. The Applicant's Comments [REP4-298], pp. 245-7, include some points about their use of neighbourhood plans (NPs). We have already raised concerns about this [in REP3-102], so will not repeat them in detail now, but for clarity the key issue is about the use of the evidence base that supports a NP. It is one thing to acknowledge the existence of such studies now, and another to use them to help reach the judgements made in the ES. In the case of the Broomfield NP, there is no evidence that the NP Landscape Appraisal [REP3-105] and the 'Review of Local Green Space, Valued Landscape and Key Views' [REP3-106] have been used to reach judgements in the ES. There is no reference to them in the ES and they are not listed in the bibliography. 10. The Applicant's Comments on pp. 246/7, (responding to REP3-106) confirm their methodology of assessing landscape value by utilising landscape character areas (LCAs) as part of the impact assessment process. The character areas to the west of Broomfield comprise the Central Essex Farmland LCA (assessed as being of medium value) and where adjacent to Broomfield, the Chelmsford and Environs LCA which is awarded a low-medium value, contrary to the Valued Landscape assessment. By using the broader LCA classification to award single sensitivity judgements, the Valued Landscape west of St Mary and St Leonard's Church Broomfield is not acknowledged. 11. The Group considers the value to be higher than medium or medium-low in this location by virtue of its perceptual qualities such as tranquillity, lack of overt development and historical features. This matters because an understanding of value feeds into an understanding of sensitivity which in turn informs judgements on significance of effect. The Group agrees with the Applicant that there would be major and significant effects within 500m but contends that they extend further than this in the area west of Broomfield. This issue affects both confidence in the Applicant's proposed scheme and the relative merits of alternative routes in the Chelmsford area.	The Applicant is in agreement with the Group's assertion that significant effects extend beyond 500 m. These findings are set out in the Environmental Statement (ES) and explained below. The Applicant notes the points relating to Neighbourhood Plans and the contribution and evidence such sources can provide to baseline studies. As noted by the Parishes Group, the Applicant has responded previously to confirm that consideration has been given to these studies as part of baseline research and directed them to relevant references on page 102 of 5.6 Planning Statement [APP-085], and also in 8.1 Errata List [REP4-185]. Published landscape character areas are used in addition to desk-top research and site survey to support the assessment and provide a consistent approach to establishing baseline conditions over a Study Area, from which the Applicant is able to draw its own conclusions about value and susceptibility. The Applicant notes that significant effects are identified in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] within 1.5 km of the Project in LCA B1: Central Essex Farmlands. The Valued Landscape identified in the Alison Farmer study lies over 600 m from the west of the Project alignment, and the conservation area and church lie over 1.2 km from the Project alignment. LCA B1 extends to approximately 1 km from the east of the Project as it passes to the west of Broomfield, indicating that major significant effects are anticipated within 0.5 km, and moderate between 0.5 km and 1 km. The LCA G2: Chelmsford and Environs lies at approximately 1 km east of the Project, and minor effects (not significant) landscape effects are reported. There will be no direct landscape effects, such as loss or changes to landscape features, resulting from the Project within either the Valued Landscape area or within the conservation area. Viewpoint 6.14: PRow west of Broomfield (Broomfield 12) in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Part 4 of 4 [APP-232] is located adjacent to the conservation area and church. Sensitivity is reported as high with acknowledgement of the conservation area and church, along with the Broomfield Neighbourhood Plan and proximity to key views 19 and 20 included in the report. Minor-moderate (not significant) visual effects are reported at this location. The Applicant remains confident in its approach and findings, noting major effects within 500 m, a transition to moderate effects between 0.5 km and 1 km, and to minor effects beyond 1 km. This is in line with the Group's assertion that significant effects extend beyond 500 m. Landscape and visual matters, along with all other matters relating to route selection, were considered when establishing the preferred route alignment.
REP5-262	Palmer & Klein Limited	Palmer & Klein's Written Representations ('WR') set-out their efforts since January 2024 to engage with the Applicant to agree measures to mitigate the scheme's impact on the oil recycling business. It noted there was no engagement by anyone in a decision making role from the project and the need for P&K to	Representatives of the Applicant have met representatives from Palmer & Klein (P&K) at a number of events and at a number of site meetings. The Applicant's response regarding the mitigation requests is as follows: Request 1: The Applicant can confirm that an appropriate mechanism can be developed to ensure that the P&K business is not in a negative cash flow position if it is required to respond in a manner that incurs additional external

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		write 17 times before the Applicant agreed to the first on-site meeting in November 2025. At Compulsory Acquisition Hearing 3 (CAH 3), I set out the main mitigation requests: 1. Need for an advance compensation mechanism to advance fund any unavoidable costs of exporting waste-water from site (and avoid critical cash-flow risk if left to the compensation code) 2. Mitigation – agree re-alignment of haul road to the edge of order limits to avoid the waste water spreading area 3. Agree to move cable pulling to other locations The Applicant had told P&K these issues were being progressed through their 'Commitments' process. Following CAH 3 we met with the Applicant on-site in early May 2026 where they agreed to set out their position on Commitments for the above by the end of May. To date we have no response on these Commitments. P&K are therefore in the same position as in January 2024, with no certainty or commitment that there will be any measures to mitigate the significant and avoidable impact of the Scheme. Relevant government guidance says: "The confirming authority will expect the acquiring authority to have considered what mitigation measures will be in place against any identified impacts of the exercise of the compulsory purchase powers included in the compulsory purchase order and the acquisition of a person's interest in the land . This may be through mitigation already built into the existing compulsory purchase order process and compensation regimes, or through specific mitigations put in place for the compulsory purchase order to deal with identified issues." Palmer and Klein's requirements are reasonable and proportionate. They are open to constructive discussions, and await the Applicant acting on the previous assurances they have made, including that the issues will be progressed through the Commitments process. Until then the Applicant has not made reasonable efforts to acquire rights and land by agreement, has therefore not justified a compelling case in the public interest as required for S.122 of the Planning Act 2008 .	costs to implement off-site mitigation. This has been captured as Additional Detailed Design Request reference ADDR 66 in Appendix F. Request 2: The Applicant cannot accept this change as it increases the length of haul road to an extent that substantially increases cost without offering a material benefit. This is in the context that the potential for interaction may be limited due to the timing of construction works. Request 3: The Applicant notes the respondent's preference but cannot confirm whether this is possible until the completion of detailed design. A decision will be based on engineering requirements noting that if not here, then it will move to affect a different landowner. The Applicant has the following dialogue with the AP since CAH2: • 9 May 2026 – Site meeting with landowner and their agent. The Applicant's land, engineering and construction representatives attended. • 9 May 2026 – Email summarising the actions was sent by the AP's agent to the Applicant. • 29 May 2026 – Email response from the Applicant requesting information on the contaminants within the wastewater, required to understand a suitable drainage solution. • 1 June 2026 – Email to AP's agent confirming appropriate wording will be sent to agent in due course. • 5 June 2026 – The Applicant responded to the AP's agent with a summary detailing the proposed mechanism for advanced compensation to minimise impact on the business and information required to progress this. This has also been captured as Additional Detailed Design Request reference ADDR-66 (see Appendix F). • 10, 11, 12 and 17 June 2026 – Liaising with the AP's agent re • 22 June 2026 – Teams call with the Applicant and the AP's agent to discuss matters in relation to the compensation mechanism and proposals to move this forwards. • 22 June 2026 – Email response from the AP's agent requesting further clarification. • 22 June 2026 – Email received from AP's agent providing details of contaminants and other requested information regarding the business and waste water. • 26 June 2026 – Email from the Applicant to the AP's agent regarding the proposed GI works. • 2 July 2026 – Email response from the AP's agent requesting further clarification. • 3 July 2026 - The Applicant has arranged a Teams meeting with the landowner, their agent and the Environment Agency on 3 July 2026 to discuss points regarding wastewater and boreholes. The Applicant will work with the AP to set out a schedule of proposed future engagement and to draft a side letter to confirm the appropriate mechanism for advanced compensation.
REP5-305	Paul John Whittle	Comments on NG's responses on PEA Appendix I – Heritage Bounds Farm [REP3-137]	The Applicant does not agree with the respondent's interpretation and notes: • There is no undergrounding of the substation at Orsett

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		“Too close” – the Applicant says it is all the fault of the listed property! The Applicant feels that as the substation is so close to Bounds Farm there is no way that they can mitigate the impact of the project on the listed building's setting. The Applicant says that the operational noise from the proposed substation is what it is, and the proximity of the listed building is such that no mitigation is possible. The undergrounding of the substation is apparently too costly - an option to consider whereas it apparently can be justified at Orsett. Have they attempted to value the effect on the historic property's setting and experience of noise? Laughably the Applicant states that the impact on the historic environment is only temporary during construction, and it is only a permanent impact once the substation is finished. The Applicant acknowledges that through routeing and siting the proposed substation there is a permanent impact on the listed building. So why did they site the sub-station where they did in the first place? Through routeing and siting the Applicant has ensured the proposed substation has the maximum impact on the historic environment of Bounds Farm. A “permanent moderate adverse effect” is acknowledged by the Applicant, but this is a blatant misrepresentation and downplaying of the true situation. “Wirescape” The Applicant acknowledges there is a potential ‘wirescape’ with the proposed substation and the North Falls and Five Estuaries substations. A breach of the Planning Rules. Alternatives Why has compulsory purchase or discretionary purchase not been considered? The owners, as the Affected Party, were not made aware by National Grid that the property was now classified as Category 2, whatever that is. Abuse of land ownership The Applicant has already taken liberties in trespassing on the Bounds Farm site to obtain access to a neighbouring property.	- The respondent ignores the reality of the planning and environmental assessment system which does not require there to be no effect for development to be considered to be acceptable - The Applicant disagrees that there is a wirescape created with the North Falls and Five Estuaries developments which comprise underground cable connections. The Applicant acknowledges that there would be significant cumulative effects on landscape character and visual amenity as a result of the Project in addition to the North Falls and Five Estuaries Substations, within the Bromley Heaths Landscape Character Area (LCA) and Visual Receptor Area (VRA) C13 Little Bromley as set out in Table 2.2 of 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. The Applicant has sought to reduce effects on landscape and visual receptors through embedded mitigation measures, including the proposed Environmental Area around the East Anglia Connection Node (EACN). The Applicant has engaged with the North Falls and Five Estuaries projects on matters of design, as set out in response to DES 2.1 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211]. Heritage – The Applicant has previously addressed concerns regarding Bounds Farm in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303] (pages 28–29). The assessment of the asset, including the contribution of its setting and the effects of the Project, is set out in the Environmental Statement, where Bounds Farmhouse is assessed as experiencing a moderate adverse significance of effect and mid less than substantial harm (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision C] and 6.11.A7 Environmental Statement Appendix 11.7- Assessment of Harm to Designated Heritage Assets [APP-215]). As construction activities cease at the end of the construction phase, impacts arising due to changes in the setting of a heritage asset due to construction activity are treated as temporary. The presence of the permanent infrastructure is assessed for the operation phase. The Applicant has reviewed the comments and does not consider that the points raised materially affect the conclusions of the assessment, and therefore maintains the position set out in the Environmental Statement and subsequent submissions. Siting – The Applicant considered the potential effects arising from alternatives locations, but notes that it is not possible to identify a location that has a complete absence of effects. In this case the effects on the heritage assets are considered acceptable in terms of policy compliance Under the UK Planning Act 2008, Category 2 encompasses individuals or organizations with a legal interest in land affected by a proposed Development Consent Order (DCO), or those who have the power to sell, convey, or release that land, but do not actually occupy The Applicant notes the APS concern and will investigate this allegation and then reach out directly to the AP and their agent to resolve any outstanding matters if they are substantiated. The Applicant confirms there has been regular contact between Fisher German and the AP's agent. The position regarding voluntary negotiations and land acquisition was confirmed by Fisher German to the AP's agent in an email

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			dated 8th June 2026. This confirmed that the Applicant is not seeking to progress negotiations for voluntary agreement on the AP's holding. Under the UK Planning Act 2008, Category 2 encompasses individuals or organizations with a legal interest in land affected by a proposed Development Consent Order (DCO), or those who have the power to sell, convey, or release that land, but do not actually occupy
REP5-307	Penny Lang	Comments on NG response at DL4 to Action Pt 34 (8.5.8 – SIH2 Action Points (A) COLNE VALLEY The Applicant's mention of an already (accepted as) rejected "western route" is irrelevant to the Action Point 34. The request from the Panel at the ISH was for NG to justify their lack of similar consideration for Colne Valley as for Waveney Valley – i.e. why was underground not considered in the same way at the appropriate time. Their explanation at Deadline 4 still fails do so. There appears to be no mention by the Applicant of the importance of the settings of heritage assets, which is crucial to the positioning of any infrastructure which would interfere with their historical context. NG: <i>"and across Mill Road at a point where the Project is able to avoid the Roman Villa excavation site and potential impacts on buried archaeology"</i> My reply: I understand that the position of pylon TB047 is still not clear: NG statements and maps are at odds, the pylon appears still to sit on top of this sensitive archaeological site. NG: <i>"at this stage, and bearing in mind the cost and programme implications of change at this stage, it is appropriate to note that the Application should be judged on its merits and against the relevant policy. It does not stand to be judged against the perception by some that one or other alternative is in some way better"</i>. My reply: i] If suitable alternatives had been considered at the appropriate point in the process, there would not have been "cost/programme implications at this stage". And it is being judged by the Panel (as appropriate) against "the relevant policy". ii] Bearing in mind the number of methodology failures with regard to surveys/assessments by the Applicant, it seems unreasonable that we should be asked to accept that the Application should be "judged on its merits". If that was the case, there would be no need for the DCO; it is those purported "merits" which are being discussed. Through flawed judgement, the Applicant has failed to prove that the project would not cause widespread significant adverse effects to the Colne Valley	The Applicant notes the respondent's opinion that its response to Hearing Action Point ISH2 34 is not sufficient. The Applicant disagrees with this position and notes that should the ExA require more information than has been provided, this request can be made of the Applicant. The Applicant acknowledges that an early iteration of the Order Limits placed a pylon immediately south of the Romano-British excavation site. The archaeological potential of this site, however, was identified early and the location of pylon TB47 was moved into the neighbouring field to the north-east as a result. The pulling location for TB47 has also been modified to avoid the excavation area. The pulling location will not result in any below ground impacts. The current iteration of the Order Limits and pylon alignment is detailed in 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [REP4-109]. Although significant landscape and visual effects are identified in the Colne Valley, the Applicant does not consider them to be 'widespread' in the context of NPS EN-5.
REP5-307	Penny Lang	The Interested Party has submitted a summary of their main points and observations from Examination so far. The Applicant has not replicated this submission in full as it reiterates matters	The Applicant acknowledges the comments raised by the Interested Party and the continued objection to the Project. The Applicant has responded to previous and similar submissions by the Interested Party in the following documents:

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		previously raised by the Interested Party, however in summary the key points raised are: - Concern that Colne Valley routing and assessment is different to Waveney Valley - Preference for strategic offshore coordination and HVDC alternative - Concern over impacts to properties (Jasmine Cottage, Ardleigh as discussed in ISH2 cited as an example) and businesses (Palmer & Klein cited as an example). - Treasury Green Book ignored as set out by Lord Banner KC in Pylons East Anglia submissions - Incomplete agreements with other parties at this stage of the Examination - Concern over use of 'where practicable' in the DCO, with reference to recent hedgerow works in nesting season under the Bramford to Twinstead DCO - Impacts to agricultural land, trees and hedgerows - Concerns about length of written responses by the Applicant and usefulness of 3D visualisation tools at consultation - Improper assessment of heritage assets and soils as described in Pylons East Anglia submissions - Concern over length of construction hours - Concern regarding cumulative effects in conjunction with other proposed developments, and overall visual impact on Colne Valley as set out in Landscape Partnership report submitted with Pylons East Anglia Deadline 5 submission	8.8.1 Applicant's Comments on Written Representations [REP2-029], pages 313–314 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070], under reference REP2-093 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299], page 142 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-154], page 88. The Applicant also notes references to several matters as raised by Pylons East Anglia including regarding the Colne Valley; the Treasury Green Book; hedgerow works on the Bramford to Twinstead Development Consent Order; assessment of heritage assets and soils. The Applicant refers to its detailed response to the Deadline 5 Pylons East Anglia submission at Appendix D1 which addresses these matters, in addition to the Deadline 4 and Deadline 5 responses to Pylons East Anglia submissions which also cover similar points: 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] 8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202].
REP5-264	Pylons East Anglia	Please see Appendix A of this document	The Applicant has provided a response to the Pylons East Anglia submissions at Appendix D1 of this document.
REP5-266	Raydon Parish Council	Our overall position in Raydon is that the proposed works will have a considerable and long term effect on the residents and businesses in and around Raydon. Our priority is for NG to fully consider an off shore solution. Failing that a proper consultation on the HVDC options for the full length from Norwich to Tilbury should be reviewed on the basis that timescales are being extended in any case. Below we list a series of detailed comments and considerations in response to the consultation, noting the significant shortfall in consultation documents and details at this stage.	The development of the Project has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5. Through the course of developing the Project, the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground solutions (HVDC) and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project. It is also important to acknowledge that offshore solutions are not free from environmental effects nor technical challenges. The area around Tilbury is increasingly constrained by other developments, and requires cable installation in a mobile marine environment with multiple other users and risks. Other alternative landing points such as Bradwell require routeing through multiple environmentally protected areas and

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			onward connection challenges to make the necessary connection to Tilbury Substation. The Project progressed therefore as an onshore solution. NPS EN-5 (2024) makes it clear that government's strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change. In addition to the policy guidance on the strong starting presumption, HVDC onshore was also less preferred due to the additional cost. The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the Project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements).
REP5-266	Raydon Parish Council	Timescales - There is no clear understanding of the construction programme and the duration of negative impact on residents. - NG should clarify their timescales for works phases and local impact.	Image 4.1 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] presents the Project's indicative construction phasing, to be refined as part of the detailed design. Requirement 3 of 3.1 Draft Development Consent Order [Revision F] requires the Applicant to submit a written scheme of stages prior to construction. This document will include the detailed construction timescales for each stage.
REP5-266	Raydon Parish Council	Proximity to dwellings in Raydon - The cable route is immediately adjacent to the most southerly properties in Raydon and the topsoil stockpiles wrap around Pipers Went. The proposed realignment, whilst being a welcome change, makes minimal mitigation of the negative impact upon adjacent dwellings in Raydon. - The cable alignment should be moved to be further distant from the dwellings in Raydon. The current change has no material improvement. Sufficient and suitable proposals for sound attenuation and dust suppression between the works and the adjacent dwellings in Raydon should be confirmed and agreed.	The Applicant confirms that dust mitigation measures are secured through 7.2 Outline Code of Construction Practice [Revision F] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision C] and that these documents require detailed measures to be developed and agreed with the relevant planning authority prior to the commencement of works. The Applicant confirms that noise and vibration mitigation measures are secured through 7.2 Outline Code of Construction Practice [Revision F] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision C] and that these documents require detailed measures to be developed and agreed with the relevant planning authority prior to the commencement of works.
REP5-266	Raydon Parish Council	End sealing compound west of Notley Park Industrial Estate - Pylons arriving at the end sealing compound have been realigned further east of Wenham Grove - This relocation still closes use of the airstrip during construction. The location of the pylons will affect use of the airstrip. Moving further east affects adjacent residences and heritage sites more heavily.	Matter 7.7 within 8.3.35 Draft Statement of Common Ground – Raydon Wings [REP4-245] states the Applicant's willingness to explore the potential for adjustments to the made within the order limits surrounding the proposed underground cable route to minimise temporary disruption of the aerodrome during its construction. The Applicant's position is that the cable trenches have potential to be routed at the eastern end of the runway. The construction of the proposed overhead line alignment is not assessed to have a significant impact on aerodrome operations during its construction.
REP5-266	Raydon Parish Council	Access to compound via Woodlands Rd - It is proposed to provide a junction from Woodlands Rd to the end sealing compound. NG at webinar confirmed this route is for maintenance access only and will not involve heavy plant access. Otherwise this would result in increased traffic attempting to pass through Raydon and negotiating the very narrow and difficult Woodlands Road junction in Raydon. - Construction access to the End Sealing Compound (ESC) and works should either be along a haul road adjacent to the works from Acacia Rd north to the ESC or via the existing airfield access route off Acacia Road	There is no access proposed to the Cable Sealing End compound via Woodlands Road. Permanent access to the Cable Sealing End compound will be via a new site access bellmouth on Bottle Bridge Road.

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		instead of via Woodlands Rd. NG have advised that the new junction proposed off Woodlands Road is for maintenance access to the ESC for ongoing maintenance only. Heavy vehicles will not be required to access this compound. The junction with Woodlands Road and The Street Raydon cannot accommodate large vehicles.	
REP5-266	Raydon Parish Council	Aggregate storage - Major concerns regarding the aggregate store that was on the original plans North of Raydon, where has it gone ? Where is NG going to be obtaining aggregate from? - NG to clarify.	As the design of the Development Consent Order (DCO) developed between statutory consultation and the final design submitted for DCO it was concluded by the design team that the location of aggregate storage could be rationalised into the cable compound area located off Acacia Road.
REP5-266	Raydon Parish Council	Crossing B1070 - Anglia Water's ongoing new NSIP pipeline works have not closed the B1070 apart from two weekends. We seek confirmation that the NG works will not disrupt traffic on the B1070 or result in diversions on Quiet Lanes and unclassified roads. - Local roads cannot take diverted traffic. Active management of such works will be required. See below.	The Applicant is proposing to install a crossover bellmouth on the B1070, in Raydon. Section C, Sheet 7 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [Revision C] detail that a section of the B1070 could be temporarily closed for the installation of the crossover bellmouth and cabling activities depending on the method of construction developed within the detailed design. If a temporary traffic management was not appropriate the proposed diversion would be via lines SMD-C-018, SMD-C-017, SMD C-020 and SMD-C 021 as shown on Section C, Plan B of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [Revision C] . The proposed route uses the B1070, Noaks Road and Bacons Green. Detailed in paragraph 5.8.10 of 7.3 Outline Construction Traffic Management Plan [Revision E] , where diversions are necessary, due to the temporary closure of roads, they will adopt the principle that they will use the same standard of road, or higher, where practicable and available.
REP5-266	Raydon Parish Council	Tourism - The effect on tourism will be devastating , especially in Flatford, Constable Country etc, and local businesses will be hugely affected - Mitigation of the effects on visitors to the area is a key consideration to be clarified.	The Applicant acknowledges the concern raised regarding potential effects on tourism. It is noted that the locations referenced are situated outside the Project's Order Limits and, as such, would not be directly affected by construction activities. The Applicant recognises the importance of tourism to the wider local economy and has provided a range of mitigation measures to minimise disruption to visitors and tourism-related businesses during construction. These measures are secured through 7.2 Outline Code of Construction Practice [Revision F] , 7.3 Outline Construction Traffic Management Plan [Revision E] , and 7.6 Outline Public Rights of Way Management Plan [REP5-163] , and include: managing construction traffic to reduce congestion and disruption on the local highway network; maintaining access to community facilities, businesses, tourism and recreational assets within the Order Limits, where practicable; implementing temporary diversions where required, with clear signage, advance notification, and appropriate alternative routes; and ensuring PRoW crossings and routes are managed in consultation with the relevant Local Authorities, with closures kept to a minimum duration. Through these measures, access to tourism assets and visitor routes would be maintained, and disruption minimised where practicable. On this basis, and with the implementation of the above mitigation, significant adverse effects on tourism in the Wider Study Area are not anticipated.
REP5-266	Raydon Parish Council	Traffic - There are concerns regarding the road situation, mud on the roads, dust from all the traffic, the local roads are not designed to take large volumes of traffic or large vehicles.	The Construction Access Strategy is detailed in Section 5.2 of 7.3 Outline Construction Traffic Management Plan [Revision E] . The Applicant is not proposing to route construction traffic on Woodlands Road.

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		Woodlands Road is not wide enough to act as an access route to any construction traffic - Traffic will not only require management at interfaces with construction activity crossing roads. There will also be a need to actively manage diversion routes around road closures since light vehicles will attempt to divert down unsuitably narrow and single track roads. This regularly results in gridlock of single track lanes. NG will have to liaise with SCC Highways to implement active traffic management. There is a farm HGV route across the old airfield which has to be maintained as the Woodlands Road route is inadequate for this traffic. Access for emergency vehicles will need to be maintained at all times.	Paragraph 5.5.10 of 7.3 Outline Construction Traffic Management Plan [Revision E] details that at crossover points, construction traffic will ‘give way’ to public highway traffic, with detail on the proposed traffic management measures set out in Section 5.8. Paragraph 5.8.10 of 7.3 Outline Construction Traffic Management Plan [Revision E] details that where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher, where practicable and available. Woodlands Road is noted as a diversion route in Schedule 8 of 3.1 Draft Development Consent Order [Revision F]. The diversion route is proposed for the temporary closure of Bottle Bridge Road/Wenham Road and is detailed in Sheet 6, Section C of 2.5 Access, Rights of Way and Public Rights of Navigation Plans [Revision C]. Diversion routes will be signposted and traffic management measures agreed with the Local Highway Authority prior to closures being implemented. The means of access will be communicated to the relevant highway authorities and emergency and essential services.
REP5-266	Raydon Parish Council	Footpaths and cycle routes - How will the local footpaths be affected ? Raydon and the surrounding areas are all famous for their walking routes and cyclists - Footpath routes cross in several locations and require maintenance as Public Rights of Way.	Information on how Public Rights of Way (PRoWs) in Raydon and the surrounding areas will be managed during construction, including the proposed management arrangements and indicative durations, is set out in 7.6 Outline Public Rights of Way Management Plan [REP5-163] and on Sheets 6 to 8 of 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [Revision C]. The overall strategy is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through the provision of appropriate temporary diversions where required. As a result, no severance of PRoWs within Raydon or the surrounding areas is anticipated from the Project.
REP5-266	Raydon Parish Council	Air quality - The air quality will be affected by all the construction vehicles and pollution that they cause. This could cause respiratory issues. - We will require assurance that dust and pollution controls will be in place and enforced.	The air quality assessment in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] assessed the impact of emissions from construction vehicles. The assessment concluded there would be no significant effect on human health. The dust and air quality mitigation measures secured through 7.2 Outline Code of Construction Practice [Revision F] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision C] require agreement with the relevant planning authority before works can commence.
REP5-266	Raydon Parish Council	Compensation - There will be numerous and wide ranging effects on residents. - NG to clarify how they propose to compensate residents and the community for the disruption and disturbance of quiet enjoyment of their residence and village.	The government has published guidance on community funds for transmission infrastructure. In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the

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			Development Consent Order, as per the Community Funds for Transmission Infrastructure guidance⁶. Additionally, the government has announced its intention to develop a bill discount scheme for households located within 500 metres of new transmission infrastructure. This remains an area of evolving government policy. The Planning and Infrastructure Act 2025 provides the government with the enabling powers to establish a scheme, with further regulations and secondary legislation required before it can be brought into operation.
REP5-266	Raydon Parish Council	War memorial - The War Memorial and airstrip have major historical value and should be retained . The War Memorial should be avoided completely, the proposed alteration on the new plans will destroy it ! - NG to advise how they will protect the historic WWII air field construction and war memorial.	The USAAF Station 157 Raydon Memorial lies outside the Project's Order Limits and will not be impacted by the Project. The concrete surface, at the north-eastern end of which the memorial is located, falls partially within the Order Limits but will not be physically impacted by the Project. Raydon airbase has been archaeologically evaluated (geophysical survey and trial trenching) and any elements of the airfield identified will be considered for mitigation. Should any above ground elements of the airfield (e.g. the perimeter concrete track) be affected, they will be replaced following the underground cable works.
REP5-266	Raydon Parish Council	Raydon Wings airstrip - Raydon Airfield is on the register as a "live airfield " so how can it be cut off while construction is underway ? - Pylons JC34 & JC35 are both located within the normal traffic zone of Raydon Wings airfield which is very dangerous and too restrictive for pilots and could put residents in danger. Raydon concurs with the Holton St Mary proposal to move the ESC and pylons further north and to access them from a haul road connection running parallel to the railway line into the A12.	Matter 7.7 within 8.3.35 Draft Statement of Common Ground – Raydon Wings [REP4-245] states the Applicant's willingness to explore the potential for adjustments to be made within the Order Limits surrounding the proposed underground cable route to minimise temporary disruption of the aerodrome during its construction. The construction and operation of the proposed overhead line alignment (and Cable Sealing End compound) is not assessed to have a significant impact on aerodrome operations
REP5-266	Raydon Parish Council	Ecology - Badger setts are present and widespread - NG to confirm they have identified and have plans to protect or relocate badger setts in advance of the works. Ecology - What specifically is planned for the new area near Pipers Went for "Ecological Mitigation" ? - NG to clarify proposals.	Badger surveys have been undertaken in impacted areas within the Order Limits, the results of which are presented in 6.8.A15 Environmental Statement Appendix 8.15 - Badger Report - Confidential [AS-042]. Pre-commencement surveys for badger would be undertaken in advance of each phase of construction works. The surveys would be undertaken a maximum of 12 months prior to the start of construction as detailed in 7.4 Outline Landscape and Ecological Management Plan [Revision F]. Where it is necessary to close an active badger sett, or undertake works that would cause disturbance to badgers, the mitigation would be secured through a Natural England licence. A draft licence application for badger has been submitted to Natural England, and the Applicant has received a Letter of No Impediment confirming that '<i>Natural England sees no impediment to licences to derogate for impacts to badger being issued, should the DCO be granted</i>' (8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England [REP4-307]). 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 this area may not be required.

⁶ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

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REP5-266	Raydon Parish Council	Maps quality - There are houses on your maps on your site that have been omitted from your new maps and you have structures and red boxes behind where these houses are . What is the red box on your latest map where Greengage Close should be marked? Bells Meadow, and Dunningham Drive have all been omitted from your maps as have the newer homes . The maps provided for consultation are wholly inadequate. They are out of date; do not show key features such as housing since built and have inadequate annotation as to the proposed changes	It is believed the maps referred to relate to a proposal for Early Enabling Works that do not form part of the Development Consent Order application. These maps comprise a standard baseline Ordnance Survey map with the proposal overlaid. Should further clarification of the proposal be required, then it is recommended to reach out to the Applicant via the advertised contact methods.
REP5-266	Raydon Parish Council	Notley Park activity - The industrial estate is actively trading and requires 24hour access for vehicle movements - NG to advise on continuity of operations.	The Notley Park industrial estate has two accesses off Raydon Road and Acacia Road, Short duration road closures are proposed on both of these to facilitate the construction of the crossover bellmouths and underground cabling, with diversion routes shown on Sheets 6 and 7 of the 2.5 Access, Rights of Way and Public Rights of Navigation plans, Section C [Revision C] . These closures will not occur at the same time, and access to Notley Park will be maintained.
REP5-266	Raydon Parish Council	Lighting - Suffolk 6 is a well noted area of dark skies. - Lighting of the esc as well as the lighting while all the works are being carried on will infringe on the dark skies . If HVDC is used there's no need for so many compounds. Light spillage will be detrimental to ecology, particularly bats routes. Lighting regimes to be confirmed to mitigate these issues. Lighting is a key consideration for all Planning Applications in the area.	Measures to minimise the effect of artificial light on biodiversity receptors are detailed in 7.4 Outline Landscape and Ecological Management Plan [Revision F] and are secured through commitment B06 in 7.2 Outline Code of Construction Practice [Revision F] . Lighting used for construction must be switched off when not in use and positioned to minimise spill on to adjacent land or retained vegetation. Lighting will be directional, away from biodiversity receptors and kept to a minimum so that the surrounding landscape remains unlit. All lighting (i.e. construction and operation (and maintenance)) will also be designed following the joint guidance provided by the Institution of Lighting Professionals and Bat Conservation Trust (2023) ⁷ . The lighting design will account for the potential effects on ecology by taking measures to minimise lighting usage, minimise light spill, use most appropriate wavelengths of light and locate lighting in the most appropriate locations to decrease the potential displacement effects on the natural environment and light-sensitive fauna such as bats.
REP5-266	Raydon Parish Council	Access roads - Two access roads on your new map have no explanation as to what they are for. - NG to clarify functions of roads and compounds.	It is believed the maps referred to relate to a proposal for Early Enabling Works that do not form part of the Development Consent Order application. These maps comprise a standard baseline Ordnance Survey map with the proposal overlaid. Should further clarification of the proposal be required, then it is recommended to reach out to the Applicant via the advertised contact methods.
REP5-310	Robert Willis	I have written previously regarding the impact of the proposals on our property - and amenity - at [redacted]. As we review the additional information and evidence submitted as part of the Examination process, we are becoming increasingly concerned about the very likely impacts on our property and lives. The examination documents demonstrate that Lark Hall/Sandpits Lane is not peripheral but sits at the centre of a defined construction corridor, combining access infrastructure, haul roads and drainage proposals in immediate proximity to our	The Applicant recognises the Affected Party's concerns around their property interest. V2 Heads of Terms were issued on 26 March 2026 with specific reference to the comments raised in respect of structural integrity, road access and residential amenity. We refer the Affected Party to the 7.2 Outline Code of Construction Practice [Revision F] submitted under the 3.1 Draft Development Consent Order [Revision F] and will reach out to further the discussions as required. Sandpits Lane is not proposed to be a Primary Access Route for construction traffic and therefore no construction traffic will travel along this road or impact

⁷ Bat Conservation Trust and Institution of Lighting Professionals (2023) *Guidance Note 08/23 Bats and Artificial Lighting*

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		house and several other sensitive receptors. This warrants very careful consideration of impacts on heritage, residential amenity and local road conditions. These concerns have been consistently raised throughout the consultation process, but to date they have not been meaningfully acknowledged or addressed by the applicant in the evolution of the scheme. We have reviewed the recent correspondence between PINs and the applicant, which you referred to in you recent letter to us. This correspondence highlights apparent flaws and a lack of assessment or full understanding of the impacts of the project on people and landscapes. This reinforces to us the importance of the DCO process ensuring sufficient safeguards are in place to protect the structural integrity of our building, road access and our residential amenity throughout the construction of the project. Picking up on my previous comments, such is the level of impact on our property, National Grid would need to carry out a robust assessment of cumulative impacts before being able to identify mitigation, and for an assessment on whether that mitigation is appropriate or adequate.	local road conditions. Construction traffic will travel along a haul road adjacent to the transmission alignment and cross Sandpits Lane at crossover bellmouths as shown on Sheets 7, Section C of the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [Revision C]. Short duration closures of Sandpits Lane are likely to be required for the construction of the crossover bellmouths and the underground cable swathe, however access will be maintained via the diversion routes as shown on Section C, Sheets B and C of 2.5 Access Right of Way and Public Rights of Navigation Plans [Revision C]. Haul road traffic will be required to give way to traffic using the local roads, and therefore will not obstruct general traffic using Sandpits Lane.
REP5-311	Russell Matthews	1. The purchase of The Gables and routing at RG081 National Grid's Deadline 2 response confirms that the fields associated with The Gables Farm, Roydon, lie within the project's redline boundary and are subject to permanent infrastructure in the form of the conductor oversail between towers RG081 and RG082. This directly contradicts the statement made in National Grid's letter of 6 August 2025, in which it was stated that the purchase of The Gables was unrelated to the project. I respectfully ask the Examining Authority to require National Grid to explain how the routing decision at RG081 was made independently of its ownership of The Gables land, and to confirm that the routing was determined on technical and environmental grounds rather than influenced by land availability. 2. The right of access through Woodcrest Barn National Grid's Deadline 2 response confirms that the right of access claimed through my property is for survey and maintenance purposes only and is not incorporated into the project design. This commitment is now on the examination record. However National Grid has not addressed the physical workability of the claimed access route. At a site meeting on 12 March 2026, I demonstrated to Fisher German, acting for National Grid, that the position of the hedgerow and ditch makes the access route as described in the 2014 Deed physically unworkable. No written response has been received since that meeting. I ask the Examining Authority to require National Grid to confirm its position on the physical workability of the claimed access, given that its examination commitments assume the access route is available. 3. Discretionary purchase and impact on Woodcrest Barn National Grid's Deadline 2 response does not address the	The Applicant confirms that the alignment has not been modified since the Applicant acquired the interest in land at Gables Farm. 3. The purchase of The Gables and routeing at RG081 – Pylon RG81 has not moved since its first publication in non-statutory consultation, through statutory consultation and again to Development Consent Order submission. The siting of the angle pylon RG81 is required to facilitate the route alignment south to RG84, approximately midway between properties on the edges of Snow Street and Bressingham Common to the east and west respectively. The position means properties also benefit from some filtering of views by existing tree cover and was identified pre purchase of the property. 4. Claimed right of access through Woodcrest Barn – The Affected Party (AP) accepts the Applicant's confirmation that access is not required for construction but raises concern that the claimed route is physically unworkable and seeks confirmation that it can be relied upon for future survey and maintenance purposes. A meeting is to be confirmed for the w/c 6 July 2026 to geo-locate the Rights Of Way. 5. Discretionary purchase and impact on Woodcrest Barn – The AP asserts that impacts on Woodcrest Barn, including loss of value and saleability, have not been addressed and seeks clarification on eligibility for discretionary purchase or hardship support, particularly given its proximity and connection to Gables Farm.

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		question of whether Woodcrest Barn meets the criteria for discretionary purchase, hardship support or mitigation, despite this being specifically requested in my earlier submissions. Woodcrest Barn is physically attached to The Gables. It is closer to the proposed alignment than The Gables. Two independent estate agents have confirmed a significant reduction in value and advised that the property is currently unsaleable as a direct consequence of National Grid's activities. The property was purchased as a retirement investment with a holiday let business generating growing annual revenue. National Grid's purchase of the adjoining property has materially damaged that investment without any compensation or explanation. I ask the Examining Authority to require National Grid to answer directly whether Woodcrest Barn meets any criteria for discretionary purchase or hardship support, and if not, to explain the basis on which two physically attached properties affected by the same project have been treated differently.	
REP5-312	Sally Richardson	We would like to inform you that we are totally against this Project. We appreciate the need for extra electricity in the area but I would be interested to know the cost that has accrued to date with all the mountains of paperwork, consultations, objections and variations etc. Damaging farmers livelihood and totally devastating the beautiful landscape of East Anglia. What an eyesore we are leaving for future generations. The route around the coast would have been a better option and safer too as overhead cables are vulnerable.	The objection to the Project is acknowledged. National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Report on Interrelationship with Other Infrastructure Projects [REP4-296] The East Anglia THREE Offshore Windfarm is included in this document under section 3.3 "Non-NSIP Projects" which is misleading given The East Anglia THREE Offshore Windfarm is a nationally significant infrastructure project. In the same section, the only interaction noted between the Project and The East Anglia THREE Offshore Windfarm is the Project's Order Limits overlapping the EA3 cables connecting into the Bramford Substation, there is no mention of the interactions with the landscaping and SuDS basin required for the East Anglia THREE Offshore Windfarm and East Anglia ONE Offshore Windfarm and the access to the EA1 and EA3 substations, nor the compulsory acquisition of rights currently being sought over SPR land at plot B-20/199 which is also the operational substation for East Anglia ONE Offshore Windfarm. The SPR Parties have raised these concerns directly with the Applicant and requested that the document is updated accordingly.	The Applicant will make amendments to 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296] to be submitted at Deadline 7, to refine the description of the interaction between the Project and the East Anglia THREE Offshore Windfarm. The report will note the Project's interface with the East Anglia THREE Offshore Windfarm's sustainable urban drainage systems basin, access route and environmental mitigation. The report will also note that infrastructure is shared with the East Anglia ONE Offshore Windfarm. The consideration of this project has also been moved from Section 3.3 to Section 3.2 (Other NSIPs) of the report. The Applicant confirms in ID 6.5 and ID 6.10 of 5.9.30 Draft Statement of Common Ground – Scottish Power Renewables (UK) Limited and East Anglia Three Limited [REP5-103] that plot B-20/199 is to be reclassified as Class 8 in the 4.3 Book of Reference [Revision E] at Deadline 6, formalising that the Applicant is to no longer seek the compulsory acquisition of rights and/or temporary possession of this plot.

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REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Draft DCO [REP4-041] Class 8 Land: Class 8 land is defined in the Book of Reference [REP4-049] as “Land that is not subject to powers of acquisition nor temporary use”. Articles 27 (Temporary use of land by National Grid), 28 (Temporary use of land by UKPN and UKOP) and 29 (Temporary use of land for maintaining the authorised development) should therefore be amended to explicitly exclude Class 8 land. As currently drafted, the draft DCO allows temporary possession to be exercised over any Order Land.	The Applicant has provided a response to this comment in 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [Revision A] .
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Maintenance of access over Bullen Lane (i) Article 14(1) and Schedule 6 (streets subject to alteration of layout) – (i)(a) AP-B-003 – permanent carriageway widening including installation of a new road surface, road markings, kerbing, a suitable drainage system and utility works as required; and (i)(b) CW-B-007 and CW-B-008 – carriageway widening, junction widening and creation of passing places, including site clearance, construction of new road surface, white lining, kerbing and a suitable drainage system as required; and (ii) Article 16(4) and Schedule 8 Part 2 (streets to be temporarily closed for which no diversion is to be provided) – the temporary closure of Bullen Lane (SM-B-061 and SM-B-062) Bullen Lane is the only access road leading to the substations at Bramford, including the EA3 substation and the EA1 substation. The transmission assets, including the substation itself, have been transferred to an Offshore Transmission Owner, TC East Anglia One OFTO Limited; however East Anglia ONE Limited (a subsidiary of SPR) owns the generation assets which are wholly dependent on the operation and function of the EA1 substation. It is therefore vital that 24/7 uninterrupted access to the EA3 and EA1 substations via Bullen Lane is maintained for fire and safety reasons, as well as to ensure the continued maintenance of the EA3 and EA1 substations given these are vital parts of the overall windfarm operation. The Applicant's current proposals to temporarily close Bullen Lane with no diversions is unacceptable, dangerous and puts two critical national infrastructure projects at risk - EA3 and EA1.	The Applicant acknowledges the concerns raised by Scottish Power on access to their transmission assets. The road closure of Bullen Lane has been included to facilitate the safe construction of the permanent road widening of Bullen Lane, but, as secured in paragraph 5.8.3 of the 7.3 Outline Construction Traffic Management Plan [Revision E] , existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. The Applicant will include a commitment to provide access at all times to the transmission assets within the side legal agreement with Scottish Power.
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Land Plans – Section B [REP4-008] At present, plot B-20/180 is coloured brown on the Land Plans which would indicate that it is Class 1 land (compulsory acquisition of land). However, the Book of Reference [REP4 049] and the Statutory Undertaker Tracker [REP4-305] both note it as Class 7 land (temporary use). We therefore ask that the Applicant confirms the classification of plot B 20/180 and that the relevant documents and/or plans are updated accordingly at Deadline 6.	The Applicant confirms that plot B-20/180 is Class 7 (yellow) (not Class 1 brown). It is a sliver and therefore quite small on the 2.2 Land Plans [Revision E], which is difficult to see. The Applicant is satisfied we are only seeking Class 7 – Temporary Use land rights, as per 4.3 Book of Reference [Revision E] and 4.1 Statement of Reasons [Revision E] and no updates of the relevant documents are required.

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REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Statutory Undertaker Tracker [REP4-305] The Statutory Undertaker Tracker states at row 20 that there are no SPR owned plots affected by compulsory acquisition. This is incorrect and the following plots owned by SPR are identified as Class 1 land ("Compulsory Acquisition of land" as per the Book of Reference [REP4-049]): (i) B-20/181; (ii) B-20/183; (iii) B-20/202; (iv) B-20/203; and (v) B-20/215. The SPR Parties have raised these concerns directly with the Applicant and requested that the document is updated accordingly.	The Applicant acknowledges SPR's concerns and is actively working to update 8.7 Statutory Undertaker Tracker [Revision E] at Deadline 6
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Schedule of Affected Persons Objecting to CA or TP of their Land or Rights [REP4-313] EA3L and SPR are not currently included in the Schedule of Affected Persons Objecting to CA or TP of their Land or Rights. EA3L and SPR are not currently included in the Schedule of Affected Persons Objecting to CA or TP of their Land or Rights. The SPR Parties have raised these concerns directly with the Applicant and requested that the document is updated accordingly. The Applicant has confirmed that the document will be updated to note EA3 and SPR as Affected Persons at Deadline 5.	The Applicant confirms that the EA3L and SPR additions to 8.14 Schedule of affected persons objecting to CA or TP of their lands or rights [Revision D] were made at Deadline 5 (i.e. in Revision C) as requested.
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Comments on Draft Statement of Common Ground – Overview [REP4-055] EA3L and SPR are not noted as Affected Persons in the draft Statement of Common Ground – Overview. The SPR Parties have raised these concerns directly with the Applicant and requested that the document is updated accordingly. The Applicant has confirmed that the document will be updated to note EA3 and SPR as Affected Persons.	5.9 Draft Statement of Common Ground – Overview [Revision F] has now been changed to note EA3L and SPR as affected persons.
REP5-267	ScottishPower Renewables (UK) Limited and East Anglia THREE Limited	Draft Protective Provisions Although the SPR Parties and the Applicant are working together to agree an interface agreement; heads of terms for this are not yet agreed. Given the current status of the interface agreement and the time left in this Examination, the SPR Parties have decided to request bespoke protective provisions to protect their position until the interface agreement is entered into. A draft of these will be provided to the Applicant shortly.	The AP's position is noted, A meeting was held on the 16 June 2026 between the Applicant's legal representatives and ScottishPower Renewables' (SPR's) legal representatives and significant progress was made on Heads of Terms for the legal interface agreement. The Applicant is seeking to agree a legal interface agreement with SPR within the Examination window. A draft set of protective provisions was also shared with the Applicant on 29 June 2026 and the Applicant is currently considering the proposed terms. The Applicants version of Protective Provisions for the benefit of the SPR entities will be included in the DCO at Deadline 7 (agreed as far as possible) with any outstanding drafting issues reported in the Appendix to the SU Tracker submitted at that deadline.
REP5-268	Sheringham Shoal and Dudgeon Extensions Projco Limited	The Examining Authority of this examination have requested confirmation from Interested Parties of whether they wish to attend the Compulsory Acquisition Hearing 3 on Wednesday 24	The Applicant acknowledges the ongoing legal and technical engagement between both parties with the intention of resolving the concerns of Sheringham Shoal and Dudgeon Extensions Projco Limited.

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		June. We confirm we will be attending the hearing to represent our client who is concerned with a lack of progress being made with National Grid regarding protective provisions in respect of our client's development consent order project (the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm). Given our client's project is of national significance and is a critical national priority project, with land rights that require protection, we have an interest in representing our client's position at this Compulsory Acquisition Hearing where the powers being consented through the Norwich to Tilbury DCO will be discussed. The current proposals would interfere with that granted DCO in an unacceptable manner including creating overlapping compulsory acquisition powers without agreed protections for the wind farm project creating risk and uncertainty for both projects and the affected landowners, granting rights to acquire interests over land necessary to deliver the wind farm project in a manner that unreasonably interferes with that project, for example by allowing compulsory acquisition of rights to create overhead line infrastructure and place pylons over a consented export cable route. While our client had understood that National Grid recognised the need for collaboration on these matters and had indicated that suitable protective provisions for our client's extant DCO would be progressed, the provisions offered so far do not adequately address the overlap in compulsory powers nor the conflict between the projects in terms of the rights now being sought. Without suitable protections being forthcoming, our client must maintain an objection to the powers sought where they conflict with the windfarm DCO. We will continue to discuss matters with National Grid and hope to be in a position to provide an update at the Compulsory Acquisition Hearing on any progress made between now and then.	The Applicant reiterates its intention seeking to agree these protective provisions within the Examination window providing adequate protection to the respondent. The Applicant will include within the DCO at Deadline 6 a version of bespoke Protective Provisions for this AP's benefit, noting however that they are not currently agreed. The Applicant will continue discussions with this AP to seek to finalise agreement on the form of the Protective Provisions and the Legal Agreement. All contact between the parties is set out in the SU Tracker submitted at Deadline 6.
REP5-313	Sir Bernard Jenkin	Fair Appraisal of Alternatives It is essential that, in the consideration of alternatives, those alternatives are appraised on the basis of verifiable fact. There are serious concerns that this is not the case in the Applicant's presentation of alternatives to the Examination.	The Applicant disagrees with this characterisation and its position is that it has considered the alternatives on the basis of consistent information drawn from published data or from a comparable level of investigation.
REP5-313	Sir Bernard Jenkin	<i>AC versus DC Capacity Requirements</i> When it comes to transmission using alternating current (AC), some excess over planned capacity is required. With direct current (DC), no such excess is required. This is set out in the National Grid's Eastern Green Link 3 & 4 Strategic Optioneering document (see extract below). This explains that if an underground or subsea DC alternative to the Norwich to Tilbury AC overhead lines or undergrounding is selected, only 4GW of capacity would be required to do the same job as the 400kV overhead lines. This would mean that for a DC solution, only 2 x 2GW circuits with one converter stations at each end would be required, as opposed to 3 x 3GW circuits with two converter stations at each end.	Paragraph 15.4.14, page 124 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] stated: <i>'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).'</i>

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		(As a point of fact, neither Pylons East Anglia nor the Offset Group of MPs has ever proposed DC undergrounding for the Dedham Vale alone, with converter stations to the north and south of the Special Landscape area, NG appears to believe.) It will be immediately apparent that this would make a significant reduction in the cost of the DC alternatives, which NG say they have considered. The reduction in the number of cables and converter stations would also reduce the harms associated with land take, including farmland, hedgerows and trees lost, if an HVDC solution were to be delivered.	As set out in paragraph 3.2.10, page 25, of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]: <i>'The current post-fault capacities of:</i> • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.' This shows the physical capacity across the boundaries is required to be greater than 6,000 MW (6 GW); therefore, the Applicant as stated above in the quoted paragraph 15.4.14, could no longer in this case consider a 4,000 MW (4 GW) high voltage direct current (HVDC) solution as it no longer has the physical capacity to meet the need. The (Eastern Green Link) EGL3 and EGL4 HVDC projects only required HVDC capacity of 4,000 MW (4 GW) in that case; however, if an alternating current (AC) solution were to replace that option over a distance of >600 km, the capability requirement would still be 4,000 MW (4 GW). However, due to the way AC circuits work in that case a larger capacity AC solution would be required to better share across the rest of the AC network. Therefore, the Applicant always compares 2 GW HVDC links (as in the Case with Sealink) and 4 GW HVDC links (as in the case for EGL3 and 4), with a minimum of a 6,380 MW AC alternative. In the case of the EGL3 and EGL4 the alternative set out on page F3 of Appendix F 'Eastern Green Link 3 (EGL3) and Eastern Green Link 4 (EGL4) - Strategic Options Report (SOR) May 2025' was over 768 km in length, which is over four times the length of the Applicant's proposal. These distance impacts are reflected in the EGL3 and 4 evaluation, using the same consistent appendix set out in Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP 357], which is mirrored in the EGL3 and 4 documentation. This is regardless of the capacity required as AC circuits form part of an overall AC network and will naturally share the power flow across the new circuit. This requires it to be considered as a suitable size to allow those flows to occur. However, in the case where more than the 6 GW physical capacity is required across a boundary to meet the need, then the physical capacity of both a HVDC and AC need to be 6 GW or greater to meet the need. For the Applicant's Project this need for 6,000 MW (6 GW) of capacity is set out in Section 3: Need Case, pages 20–38, of 7.17 Strategic Options Backcheck and Review [APP-355].
REP5-313	Sir Bernard Jenkin	<i>Evidence from National Grid's Own Documentation</i> The following paragraphs from National Grid's Eastern Green Link 3 & 4 Strategic Optioneering document, which are directly relevant to the appraisal of alternatives in this case: <i>"5.0.1 The largest capacity AC technology option that can be used on NGET's transmission system consists of two 3,465 MW transmission circuits that are supported on a single set of towers (6930 MW double circuit capacity). The largest HVDC capacity systems that can currently be accommodated on our transmission system are 2,000 MW HVDC cables.</i>	Paragraph 15.4.14, page 124 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] stated: <i>'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).'</i>

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		5.0.2 Power flows on AC transmission system circuits cannot be controlled to the same extent as can be achieved using HVDC connections. This lower level of controllability can result in higher power flows particularly during transmission system fault conditions. Taking account of the potential for higher power flows that could be expected, therefore to provide the potential equivalent capacity, the AC option would need to consist of a high capacity (6,930MW) double circuit route to meet any high loading during fault conditions. 5.0.3 The required capacity HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option in this case. It is also recognised that delivery of an onshore solution with a long route length, carries much higher delivery risk than the HVDC reinforcement proposals (EGL3 and EGL4) that are currently being progressed. The use of overhead lines is not considered to be feasible because they cannot be delivered by the required 2030 timescale." The principles set out in these paragraphs are directly applicable to the Norwich to Tilbury project in that they have not been adequately addressed in the Applicant's alternatives assessment. The panel is respectfully asked to require the Applicant to demonstrate why a comparable HVDC approach has been rejected, particularly given the significant reduction in harm and cost that such an approach may offer.	As set out in paragraph 3.2.10, page 25, of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]: <i>'The current post-fault capacities of:</i> • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.' This shows the physical capacity across the boundaries is required to be greater than 6,000 MW (6 GW); therefore, the Applicant, as stated above in the quoted paragraph 15.4.14, could no longer in this case consider a 4,000 MW (4 GW) high voltage direct current (HVDC) solution as it no longer has the physical capacity to meet the need. The (Eastern Green Link) EGL3 and EGL4 HVDC projects only required HVDC capacity of 4,000 MW (4 GW) in that case; however, if an alternating current (AC) solution were to replace that option over a distance of >600 km, the capability requirement would still be 4,000 MW (4 GW). However, due to the way AC circuits work in that case a larger capacity AC solution would be required to better share across the rest of the AC network. Therefore, the Applicant always compares 2 GW HVDC links (as in the Case with Sealink) and 4 GW HVDC links (as in the case for EGL3 and 4), with a minimum of a 6,380 MW AC alternative. In the case of the EGL3 and EGL4 the alternative set out on page F3 of Appendix F 'Eastern Green Link 3 (EGL3) and Eastern Green Link 4 (EGL4) - Strategic Options Report (SOR) May 2025' was over 768 km in length, which is over four times the length of the Applicant's proposal. These distance impacts are reflected in the EGL3 and 4 evaluation, using the same consistent appendix set out in Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP 357], which is mirrored in the EGL3 and 4 documentation. This is regardless of the capacity required as AC circuits form part of an overall AC network and will naturally share the power flow across the new circuit. This requires it to be considered as a suitable size to allow those flows to occur. However, in the case where more than the 6 GW physical capacity is required across a boundary to meet the need, then the physical capacity of both a HVDC and AC need to be 6 GW or greater to meet the need. For the Applicant's project this need for 6,000 MW (6 GW) of capacity is set out in Section 3: Need Case, pages 20–38, of 7.17 Strategic Options Backcheck and Review [APP-355].
REP5-313	Sir Bernard Jenkin	<i>Advanced Conductor Technology</i> In addition, Pylons East Anglia has made me aware that a submission has been provided by TS Conductor to the panel. I would like to enquire what the Applicant has done to assess the options for upgrading the existing grid using conductors of this type before building costly and damaging new infrastructure. This appears to be a most relevant alternative that warrants proper consideration, and I therefore request that the Applicant be required to provide a clear and detailed response to that submission. I urge the Examining Authority to ensure that all alternatives are subject to rigorous, consistent and fair appraisal	The applicant addressed the issues associated with the Use of High Temperature Low Sag Conductor (HTLS) and the fact the system has been upgraded to the highest 5000A capacity in the area in Issue Specific Hearing 1 and in more detail in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-032]. Set out below is further detail on the consistent evaluation of HTLS technology. The Applicant has for 20 years used high temperature low sag (HTLS) conductors on routes where older pylons cannot achieve the highest ratings due to the limitations to the number of conductors that the tower can carry. The TS conductor is just one type of HTLS conductor from one manufacturer. The Applicant has been using the MATTHEW GZTACSR conductor for 20 years, for example, to maximise capacity on old routes.

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		before any conclusions are drawn as to the need for the proposed scheme in its current form.	These HTLS conductors operate at higher temperatures (typically 150–250 °C), allowing greater losses without breaching sag limits. This reflects the constraints of older pylons, which must use smaller conductor bundles to remain within structural weight limits. The only way heat is generated in the conductor is through power losses so HTLS conductors are designed not to sag when they heat up from higher losses due to smaller conductors. Where newer, structurally stronger pylons are available, the highest network ratings can be achieved more efficiently using standard conductors operating below 90 °C. These lower-cost conductors are installed in bundles to minimise electrical losses while maximising capacity, delivering better value to consumers. Newer structures therefore achieve maximum ratings with standard conductors and lower losses. In East Anglia, both the existing and proposed network can reach the highest required ratings using these lower-loss, standard conductor solutions. As stated in paragraph 3.2.9 to 3.2.12 page 25, of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-032]: <i>‘There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission,</i> <i>of 5,000 amperes, being the highest available equipment. This equates to:</i> <i>• A capacity on a single circuit of 3,465 megavolt-ampere (MVA)</i> <i>• A double circuit of 6,930 MVA</i> <i>• Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.</i> <i>The current post-fault capacities of:</i> <i>• EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW</i> <i>• EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.</i> <i>These circuits are operating within about 300 MW of the maximum capability, and therefore, new infrastructure is required to meet the deficits.</i> <i>Given the system indicated above is operating within 300 MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected, is set out in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]:</i> <i>• LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings</i> <i>• TS Conductor — High Temperature Low Sag (HTLS) conductor</i> <i>• Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors</i> <i>• Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation</i> <i>• EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages</i> <i>• Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting</i>

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			<i>the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.'</i> The Applicant made it clear the existing network cannot be enhanced further as it is maximised to the 5,000 A rating currently. Therefore, reconductoring in East Anglia has been maximised to 5,000 A rating; where reconductoring is being done on the Applicant's system it is to improve circuits to meet this maximum 5,000 A rating limitation. Where circuits are operating below this limit reconductoring is always considered, including using HTLS conductors where the pylons cannot meet the 5,000 A rating with standard conductors. The triple Araucaria conductor, which is a 700 mm² conductor carried in a three-wire formation, operating at 75 °C, can meet the 5,000 A year round rating. Where the Applicant uses HTLS conductors in double formation with conductor sizes below 700 mm², the resistivity of the conductor which is proportional to the total cross-sectional area of the conductor bundle increases. This means that 5,000 A cannot be achieved without conductor operating temperatures closer to 200 °C. This gives rise to higher system losses, which impact consumers. Therefore, using HTLS has to be a balance of system need, transmission infrastructure and cost to consumer. Where the system can accommodate the maximum 5,000 A rating with traditional conductors, they are chosen to minimise electrical losses while maximising capacity, delivering better value to consumers. As set out above the Applicant has provided a clear and detailed response on the use of conductor technologies and how they are best applied to meet the maximum 5000A circuit rating. This takes into account the best way to achieve the maximum possible 5000A circuit rating at the lowest possible electrical losses, delivering value to consumers and delivering a more efficient and operable transmission system for the future.
REP5-270	Suffolk County Council	Table 1: 2.16 (B) Trees and Hedgerows to be Removed and or Managed Plans – Section B [REP4-030] and Section C [REP4-031] Table Item 1.1. The plans do not identify by reference to the numbering systems of the Tree Survey or the Hedgerow Regulations Report the trees and hedgerows, which would be useful to assess the impacts/significance of the proposed works, even if it is provided elsewhere, for ease of reference.	Table item 1.1. The Applicant acknowledges the Council's request to add the hedgerow numbers and tree numbers to these plans, but has no plans to amend 2.16 Trees and Hedgerows to be Removed and or Managed Plans – Section B [REP4-030] and Section C [REP4-031] to include this information.
REP5-270	Suffolk County Council	Table 1: 2.16 (B) Trees and Hedgerows to be Removed and or Managed Plans – Section B [REP4-030] and Section C [REP4-031] Table Item 1.16. South of Tye Lane, there appears to be great loss of vegetation. Not only numerous trees within a hedge line but also the severing of a linear TPO group in two separate areas and incursion into the Ancient Woodland of Bushy Grove. SCC would ask the Applicant to consider how harm can be minimised here and considers that this strengthens the argument that a landscape restoration scheme commensurate with the harm inflicted is required around Bramford substation and Burstall.	The plans referred to show a worst-case scenario whereby trees would be removed. As identified in 7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision C], Bushey Grove is affected by the replacement of the UK Power Networks overhead line with an underground cable and the measures outlined in the report have been designed to protect this habitat. 7.4 Outline Landscape and Ecological Management Plan [Revision F], identifies that tree and hedgerow loss will be kept to a minimum both to minimise the environmental impacts and avoid the need for replacement planting. The Applicant has been engaging with the Council regarding landscape compensation/offsetting measures around Bramford, whilst the Applicant does not consider the measures to meet the relevant legal tests for the reasons set out in 8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [Revision A],

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			should the Secretary of State consider the measures necessary, the Applicant is working with the Council to secure these.
REP5-270	Suffolk County Council	Table 2: 3.5 (C) Schedule of Changes to the Draft DCO [REP4-042] A drafting point: as drafted, for the relevant highway authority to be consulted on a management plan, the context would have to be relevant to the operation of the local <u>and</u> strategic road network. SCC considers relevance to either network should trigger consultation and so SCC would suggest that new paragraph 4(1) should be amended as follows – 4. Construction Management Plans (1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (following consultation with Natural England in the case of the landscape and ecological management plan and, where relevant in the context of the operation of the local or strategic road network, the relevant highway authority). The relevant plans are— ...	The Applicant has updated 3.1 Draft DCO [Revision F] accordingly.
REP5-270	Suffolk County Council	Table 3: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report – Part 1 [REP4-128]	The Applicant notes that SCCAS had already provided comments on this document, which were actioned and responded to at Deadline 4. The update requested in Table 3, item 3.1, will not be actioned as this asks for an ExQ1 response which addressed how geophysical survey results had been used to inform the assessment of archaeology in 6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C] be incorporated in the technical geophysical survey report, the purpose of which is to present the results of the survey not to undertake the impact assessment. The comments regarding interpretation of the greyscale have been passed to the archaeological contractor and if relevant an updated version of the report will be shared directly with SCCAS.
REP5-270	Suffolk County Council	Table 4: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report – Part 2 [REP4-130]	Noted. The Applicant will respond when SCCAS provide this information.
REP5-270	Suffolk County Council	Table 5: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report - Part 3 [REP4-132]	The Applicant confirms that this matter is addressed within the archaeological evaluation assessment reports, which include consideration of the relationship between geophysical survey results and the results of trial trenching.
REP5-270	Suffolk County Council	Table 6: 7.2 (D) Outline Code of Construction Practice [REP4-165] Please refer to comments made in the Joint LIR [REP1-178] in relation to Table 6.1 Mitigation measures / environmental commitments (LV01 – LV10). Comments copied below for ease of reference: • LV03 - SCC would welcome if temperature of light (Kelvin levels) could be agreed with relevant authority. • LV09 - Query, how this aligns with B07, B13 and LV10.	The Applicant notes the points raised and provides further clarification below: • LV03 – This commitment refers to B06 for additional details. B06 confirms that all lighting (i.e. construction and operation (and maintenance)) will be designed following the joint guidance provided by the Institution of Lighting Professionals and Bat Conservation Trust 2023⁸. Paragraph 4.2.9 of this 2023 guidance recommends ‘<i>A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component</i>’ amongst other recommendations. This commitment is to be confirmed by the Main Works Contractor in the Code of Construction Practice (CoCP) under Requirement

⁸ Bat Conservation Trust and Institution of Lighting Professionals (2023) *Guidance Note 08/23 Bats and Artificial Lighting*

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			4 to be submitted to and approved by the relevant planning authority at the Discharge of Requirements stage. LV09 – This commitment relates to works within tree root protection areas (i.e. access, excavations) and is associated with the below ground parts of the tree and their relating interaction with soil ecosystems. B07 – This commitment refers to retained habitats in general whilst making reference to watercourses. It states that the applied 10 m Construction Exclusion Zone may need to be extended for woodlands and trees in order to fully protect the root protection areas. By way of example and applying the guidance within British Standard 5837:2012, a tree with a recorded stem diameter of 1 m would have a root protection area of 12 m. B13 – Whilst making reference to tree surveys, this commitment is more inclusive of other constraints not related to trees and that may need to comply with Internal Drainage Board and the Environment Agency. LV10 – This commitment is distinctly different from LV09 as it relates to the above ground parts of a tree and any pruning that may be required to avoid injurious contact.
REP5-270	Suffolk County Council	Table 7: 8.2 (B) Drainage Strategy DCO [REP4-187] - Appendix A: SCC (LLFA) notes that not all drainage areas have a viable strategy for water disposal. - While the Drainage Strategy Appendix B is not required to address archaeological impacts directly, it identifies locations where drainage infrastructure, temporary and permanent construction works, and potential changes to surface-water movement may occur. These elements have the potential to affect buried archaeological remains through ground disturbance and/or changes to preservation conditions. The OAMS-OWSI should therefore take account of the drainage and construction-related works identified in this document, to ensure that all areas of ground disturbance are subject to archaeological evaluation (geophysical survey and trial trenching) and mitigation where required. - SCC (LLFA) states that the minimum infiltration rate is 10mm/hr, and that any drainage pipes under the public highway will require a licence from SCC Highways. Appendix C Illustrative Drainage Typical Details is missing.	- The Applicant notes there are 19 drainage features in 8.2 Drainage Strategy DCO [Revision C], Appendix A that are indicated to have '<i>no nearby watercourses to outfall to, therefore, full infiltration basin required. Groundwater table to be below base of infiltration basin. To be verified through GI survey of basin location. Ground conditions may not be favourable, with ground infiltration not possible or infiltration rate lower than expected. To be verified through infiltration test</i>'. If infiltration testing demonstrates that discharge via infiltration is not feasible, the Applicant will follow the discharge hierarchy set out in Section 5.3 and consider alternative discharge methods; this has been clarified with the addition of footnote 23, in 8.2 Drainage Strategy DCO [Revision C]. - The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial tenching, as shown in the proposed trench plans provided directly to SCCAS on 3 June 2026. - The Applicant confirms that it has updated the Drainage Strategy (8.2 Drainage Strategy DCO [Revision C]), to reflect the Suffolk County Council Managing runoff guidance; where shallow infiltration (circa 2 m deep) is proposed, all trial pits across the site are to be carried out to BRE365 specification with minimum infiltration rate of 10 mm/hr (2.78x10⁻⁶ m/s) if infiltration is to be the sole method of drainage. - Infiltration features should discharge from full to half full within 24 hours for the 3.33% + climate change (cc) AEP storm with space for an additional 10% + cc AEP storm if it exceeds 24 hours so that the risk of it not being able to manage a subsequent rainfall event is minimised. - Any drainage pipes to be installed within the Suffolk County Council public highway would require the appropriate licence from Suffolk County Council Highways.

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			The Applicant confirms Appendix C was included in 8.2 Drainage Strategy DCO [Revision C] on page 250 of 251.
REP5-270	Suffolk County Council	Table 8: 8.4.3 (B) Report on Interrelationship with Other Infrastructure Projects [REP4-297] SCC (Landscape) considers that the interaction of Norwich to Tilbury with mitigation areas of other projects, in particular, but not exclusively, with Bramford to Twinstead, at Bramford substation, needs to be agreed with the relevant local authority and that an equally suitable, alternative area will need to be provided for the approved Mixed Broadleaved Native Woodland planting in document 7.8.2 (b): LEMP Appendix B – Vegetation Reinstatement Plans submitted during the Bramford to Twinstead examination. Changes to approved mitigation for other projects, such as Five Estuaries and North Falls Offshore Wind Farms, Bramford Green Limited, East Anglia Three Offshore Windfarm, Pathfinder Clean Energy UK DEv Ltd, Clearstone Energy, and Bramford Power Ltd also should be agreed with the relevant local authority.	As stated in response to question BIO 2.16 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211], the Applicant considers that the interaction of the Project with the mitigation / enhancement areas of other projects is appropriately dealt with by the addition of commitment S07 to 7.2 Outline Code of Construction Practice [Revision F]. Commitment S07 is in Table 6.1 of 7.2 Outline Code of Construction Practice [Revision F], secured by Requirement 4 of Schedule 3 to 3.1 Draft Development Consent Order [Revision F]. Commitment S07 states: <i>‘Engagement will take place between National Grid, its Main Works Contractor(s) and developers of other planning applications within the Order Limits in relation to, where relevant, mitigation and / or enhancement measures within their planning applications that interact with the Order Limits, to facilitate delivery of both parties’ projects’.</i> The Applicant cannot ensure or secure the delivery of mitigation by third parties on their projects, as each project is independently required to deliver its own mitigation through its respective consent. Nonetheless, the proposed engagement mechanism in commitment S07 ensures that the Applicant takes steps to achieve coordinated mitigation / enhancement proposals where they interact.
REP5-270	Suffolk County Council	Table 9: 8.4.9 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] .	Please see Appendix E of this document.
REP5-270	Suffolk County Council	Table 10: 8.4.10 (A) Applicant's Comments on Responses to ExQ1 [REP4-299] .	The Applicant acknowledges Suffolk County Council's (SCC's) comments on the Applicant's comments on SCC ExQ1 responses. The Applicant notes the position of SCC in relation to ALT 1.7, SET 1.5, LV 1.26, LV 1.34 and HE 1.9 and does not comment further, as the Applicant's own position has been set out in its response to ExQ1 (8.9.1 Applicant's Responses to First Written Questions [REP3-074]) and subsequent comments on others responses to ExQ1 (8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]). Ongoing discussions with the Council on outstanding matters are reflected in 5.9.2 Draft Statement of Common Ground - Suffolk County Council [REP5-083]; the final version of this document will be submitted at Deadline 7.
REP5-270	Suffolk County Council	Table 11: 8.5.8 (A) Applicant's Responses to Issue Specific Hearing 2 Action Points [REP4-303]	The Applicant acknowledges Suffolk County Council's comments and has no further comment. Ongoing discussions with the Council on outstanding matters are reflected in 5.9.2 Draft Statement of Common Ground - Suffolk County Council [REP5-083] and this is being further developed for Deadline 7. In relation to 11.2, SCC's comments are noted. To clarify any onsite tree planting provided as a result of the 3:1 commitment regarding individual trees will be included in the reinstatement planting plan agreed under Requirement 9. Heritage: please refer to Appendix E of this document
REP5-270	Suffolk County Council	Table 12: 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.1 Health and Wellbeing	The scope of the Technical Note was not intended to address cumulative or overlapping pressures, but simply to present findings from a comparative assessment of 2019 and 2025 Index of Multiple Deprivation (IMD) data,

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			including a focus on localised deprivation as set out in the ExA's Rule 17 Letter [PD-019]. The Applicant considers the Technical Note fulfils this scope. An assessment of cumulative effects, which include cumulative effects on health and wellbeing, has been completed for the Project and covers how combined pressures may interact. The findings from this assessment are presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. 8.16 Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] concludes that the overall pattern of deprivation along the Project has remained broadly consistent between 2019 and 2025. Although there may be relative increases in deprivation in parts of Braintree and Mid Suffolk, which may highlight greater vulnerability among local populations, the Technical Note also notes that changes in IMD rankings are largely a function of methodological adjustments and boundary revisions rather than dramatic shifts in underlying living conditions. The revised data does not materially alter the sensitivity or assessment outcomes presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B]. Good practice measures already identified in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B] and associated documents such as 7.2 Outline Code of Construction Practice [Revision F] are considered sufficient to address potential impacts identified, which are not significant (for example include preparation of a detailed communication strategy to inform communities of construction activities and the preparation of a detailed complaints procedure).
REP5-270	Suffolk County Council	Table 12: 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.2 Skills	The scope of the Technical Note is limited to the scope set out in the ExA's Rule 17 Letter [PD-019] (i.e. comparison of 2019 and 2025 IMD data and changes in localised deprivation over time) and therefore does not address issues relating to labour market capacity, skills availability, or cumulative workforce pressures arising from the Project. The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak on-site construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors. The Applicant submitted 8.13 Outline Employment and Skills Plan [REP5-215] (OESP) at Deadline 5. This provides a clear and structured framework to support local workforce development, skills enhancement and engagement with local businesses, and will be refined as part of the Project's delivery. The OESP includes an overview of employment and skills profile data for the local population and is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The OESP was developed in collaboration with host authorities including Suffolk County Council; the

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			Applicant is committed to ongoing engagement with stakeholders during the preparation and delivery of the Final Employment and Skills Plan.
REP5-274	The Coal Authority	The Coal Authority have been consulted by yourselves in relation to the above. This consultation was received on the 22nd May 2026 and the correspondence requests that we provide comments back to the Planning Inspectorate Having reviewed the site plan for the proposal against the information we hold we can confirm that the site falls outside of the defined coalfield. On this basis the Planning team at the Coal Authority have no specific comments to make. Please do not hesitate to contact me if you would like to discuss this matter further.	The Applicant notes the response from The Coal Authority.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 1. Comments on the updated Outline Code of Construction Practice (OCoCP) 1.1 The Outline CoCP has two commitments in relation to air quality. They reflect the fact that the main concerns are construction dust and onsite power generation. 1.2 The Council has the following comments regarding AQ01. Work packages are being treated as separate developments for the purpose of dust management. Outline CoCP, , Section 1.4.4 states that each package will be given an individual Dust Management Plan (DMP) that reflects the works and context of the site. Risk ratings will be calculated within each DMP, and mitigation measures will be detailed in accordance with the IAQM recommendations for that risk rating. OCoCP commitment AQ01 states that: “Dust-emitting activities will be reduced by applying site-specific mitigation measures for high-risk sites during construction.” 1.3 The language of this commitment is ambiguous, and it is not clear whether the applicant intends only to apply mitigation to high-risk sites or whether the IAQM recommended measures for high-risk sites will be implemented at all sites. If the former is to be the case, I would not consider that to be acceptable. Packages where a DMP calculates there is a low or medium risk must implement mitigation measures recommended by the IAQM for low or medium risk sites in order to ensure impacts on sensitive receptors are not significant. 1.4 The Council has the following comments regarding AQ02. Commitment AQ02 states that: “Where diesel generators are used and located next to sensitive sites consideration will be given to increasing the release height of emissions for sufficient dispersion, and relevant abatement technology.” 1.5 A commitment to “consider” mitigation does not require that any physical action be taken and therefore we see this commitment as ineffective. In addition, it is the Council's opinion that in the first instance, consideration should be given to where on a given site a generator might be located so as to increase the	AQ01: The construction dust assessment identifies a high risk of dust impact and therefore conservatively applies the IAQM mitigation measures that are relevant for high-risk dust impacts to the Project. This does not mean there would be no mitigation if a work package was determined to have anything less than a high-risk of dust impacts. AQ02: 7.2 Outline Code of Construction Practice [Revision F] under AQ01 states <i>‘Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as practical or possible.’</i> This means that in the case of diesel generators that are anticipated to be in construction compounds, they will be located away from receptors where practical. To address the concern raised regarding the commitment AQ02 in 7.2 Outline Code of Construction Practice [Revision F] has been changed to state the following: <i>‘Where diesel generators are used and located next to sensitive sites consideration will be given to increasing the release height of emissions for sufficient dispersion, and relevant abatement technology to ensure there would be no likely significant effects on relevant receptors.’</i>

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		distance between it and the nearest sensitive receptor. The Council suggests the commitment is rewritten as follows: “Where diesel generators are used, consideration will be given to siting them as far as possible from sensitive receptors. In some cases, it may not be possible to place generators at an effective distance from sensitive receptors. In these cases, the release height of emissions will be increased in order to aid dispersion, and abatement equipment will be used where adverse effects are anticipated.”	
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 2 Comments on the updated Noise and Vibration Management Plan (NVMP) 2.1 The revised NVMP includes a more detailed monitoring procedure; however, it still does not propose routine noise monitoring. Instead, monitoring is only proposed in response to complaints or where requirements are secured through a Section 61 consent. Further clarification is required regarding the types of activities for which Section 61 prior consent applications are anticipated, as this is currently unclear. 2.2 The general monitoring methodology is broadly acceptable. However, as noted above, monitoring is not proposed on a routine basis. In addition, Section 4.6.7 states: "If the location is free-field, then the levels will be corrected to façade by the addition of 3dB." 2.3 This appears to be an error. A free-field measurement would not normally require correction if the objective is to report free-field levels.	The Applicant acknowledges that the wording of 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [Revision C] is not sufficiently clear on this point, and this has been updated at Deadline 6 to align with the commitments set out in 7.2 Outline Code of Construction Practice [Revision F]. In accordance with commitment NV05 of 7.2 Outline Code of Construction Practice [Revision F], monitoring proposals during construction will be determined by the Main Works Contractor(s) through detailed assessments, documented within the Noise and Vibration Management Plan and agreed with the relevant local authorities prior to construction under Requirement 4 of 3.1 Draft Development Consent Order [Revision F]. Whilst monitoring may form part of any Section 61 agreement, this will not be the sole mechanism for securing monitoring requirements. For clarity, the intent of not undertaking routine monitoring is to avoid unnecessary monitoring where there is no material benefit. Given the scale of the Project, extensive sections of the works are located away from sensitive receptors, such that noise and vibration do not represent a material issue or constraint. In these locations, monitoring is therefore not generally required in principle. However, noise and vibration monitoring will be undertaken where it provides a material benefit, with the need, scope and methodology agreed through consultation with the relevant Local Planning Authority. Additionally, the Applicant agrees that the requirement in 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [Revision C] to correct monitored noise levels to façade noise via the addition of 3 dB will be removed.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Drainage strategy 3.1 The applicant has submitted an overall drainage layout of the development. However, a detailed drainage strategy is required for each temporary and permanent site demonstrating the location, type, function, connectivity and operation of all proposed drainage features. It should include the following details: • Infiltration test: The strategy states that infiltration may not be suitable across parts of the site; however, no infiltration testing results have been provided. The applicant must submit infiltration testing undertaken in accordance with BRE365 together with groundwater monitoring data to justify the	3.1 - The further information the Lead Local Flood Authority (LLFA) requests on individual detailed drainage designs will be provided following the Development Consent Order (DCO) Examination as secured by the Surface Water Management Plan that is secured via commitment GG22 within the 7.2 Outline Code of Construction Practice [Revision F]. • The information the LLFA requests on infiltration testing will be provided following the DCO Examination as secured by the Surface Water Management Plan that is secured via commitment GG22 within the 7.2 Outline Code of Construction Practice [Revision F]. The Applicant will follow the discharge hierarchy set out in Section 5.3 of 8.2 Drainage Strategy DCO [Revision C]; as stated in this section appropriate justification will be provided for any progression between the hierarchy levels

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		proposed drainage hierarchy and demonstrate the suitability of infiltration-based drainage features. - Design events: All permanent drainage systems and attenuation basins shall be designed to accommodate runoff generated by rainfall events up to and including the 1 in 100-year event with a 40% climate change allowance in accordance with the National Standards for Sustainable Drainage. - Discharge rate: The applicant should provide greenfield runoff calculations for each drainage catchment. The LLFA notes that some proposed discharge rates associated with the Tilbury North Substation exceed 3 l/s/ha. The applicant must demonstrate that discharge rates comply with the National Standards for Sustainable Drainage and are restricted to the equivalent greenfield runoff rate, unless otherwise agreed by the LLFA. - Detailed hydraulic calculation: The applicant has provided the table showing the contributing area, attenuation volume, and discharge rate; however, they must submit the calculations showing that there is no flooding occur during the design events, storage volumes are sufficient, and the drainage features operate within design capacity.	- This requirement is met within the Project Drainage Strategy, as set out in Table 5.2 of 8.2 Drainage Strategy DCO [Revision C] - The information requested by the LLFA regarding the greenfield runoff calculations and detailed hydraulic calculations will be provided following the DCO Examination, within the Surface Water Management Plan as secured by commitment GG22 within the 7.2 Outline Code of Construction Practice [Revision F].
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Water quality 3.2 The submitted document states that water quality treatment will be assessed using the Simple Index Approach. However, the LLFA requires quality risk assessment to be carried out based on the following: - Low & medium polluted site – Simple index approach - High medium polluted site – Water Quality risk assessment in accordance with Environment Agency requirements. 3.3 In addition, the applicant must submit the water quality risk assessment for each individual outfall prior to discharge into the watercourses.	3.2 - Paragraph 6.1.3 in 8.2 Drainage Strategy DCO [Revision C] (to be submitted at Deadline 6) has been updated to acknowledge that for the high risk sites within the Study Area in Thurrock (set out in 6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]), water quality risk assessments will be undertaken in accordance with Environment Agency requirements. This is secured by commitment GH10 in 7.2 Outline Code of Construction Practice [Revision F]. 3.3 - The risk assessments will inform the detailed design of the Project and will be submitted by the Applicant to the relevant authorities in support of their requests to discharge into watercourses, under either the approval of plans process set out in the protective provisions for drainage authorities, or as part of any formal discharge consent applications.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Sedimentation control 3.4 The applicant must demonstrate how sediment mobilisation due to the runoff generated from the construction yard, particularly from pylon working areas and construction compounds, will be effectively managed and treated prior to discharge. The submitted information should provide sufficient evidence that appropriate sediment control measures are in	To discharge Requirement 4 of the 3.1 Draft Development Consent Order [Revision F] the Applicant has committed that the Main Works Contractor(s) will prepare a Surface Water Management Plan (commitment GG22 within 7.2 Outline Code of Construction Practice [Revision F]). This will demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and or pollution. Construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs), with ongoing dialogue during implementation of the measures. There will be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority.

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		place to prevent adverse impacts on the water quality of downstream watercourses and receiving waterbodies.	
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Overland flow route 3.5 The application must consider the overland flows generated by the upper catchments as follows: • For haul roads – The culverts shall have enough capacity to convey the overland flows for the rainfall event up to 1 in 100 plus 25% climate change. • For permanent access roads – The culverts shall have enough capacity to convey the overland flows for the rainfall event up to 1 in 100 plus 40% climate change.	The Applicant confirms that this requirement is addressed within the Project Drainage Strategy, as agreed through engagement with the relevant LLFAs. For the permanent features, the climate change allowance applied is as set out in Table 5.2 of 8.2 Drainage Strategy DCO [REP4-186]. The requirements for temporary features are also set out in Table 5.2, although the climate change allowance is specified at 20% as a minimum. This was agreed with the LLFAs previously. Commitment W03 within 7.2 Outline Code of Construction Practice [Revision F] commits that new culverts will be as short as practicable and sized to avoid narrowing of natural channel widths and to convey flows generated by upstream catchments to maintain the current land drainage regime. The Applicant will engage with relevant authorities as the detailed designs of culvert crossings are developed and approvals for these structures would be secured via the approval of detailed plans process set out in the protective provisions.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Surface water flood risk mapping 3.6 As requested earlier, the applicant must provide a plan showing an overlay of the Environment Agency's Risk of Flooding from Surface Water mapping across all temporary and permanent works areas. This will help demonstrate how the proposed layout has considered areas potentially susceptible to surface water flooding.	The Applicant provided the requested mapping to Thurrock Council LLFA on the 4 June 2026.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B Water quality monitoring 3.7 The applicant must provide the details of water quality monitoring arrangements for both the construction phase and the operational phase, outlining how potential pollution risks will be managed and monitored throughout the lifecycle of the development.	Commitment W23 has been added to 7.2 Outline Code of Construction Practice [Revision F]. This describes that, where construction works are undertaken in proximity to watercourses with high sensitivity to water quality changes, regular visual monitoring for signs of water pollution would be undertaken by the Environmental Clerk of Works (ECoW)), in particular during periods of heavy rainfall. If signs of water pollution were detected the ECoW would use in situ handheld devices to record key parameters and if pollution is confirmed, appropriate mitigation measures should be implemented to prevent further deterioration. During operation of the Project, given its nature and the Sustainable Drainage features that are integrated into the design to serve the proposed new and extended substations, there would be a low risk of pollution and therefore water quality monitoring is not considered to be necessary or proportionate. To discharge Requirement 4 of the 3.1 Draft Development Consent Order [Revision F] the Applicant has committed that the Main Works Contractor(s) will prepare a Surface Water Management Plan (commitment GG22 within 7.2 Outline Code of Construction Practice [Revision F]).
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 3 Comments on the updated Drainage Strategy DCO and Drainage Strategy - Appendix B	The Applicant provided further information to Thurrock Lead Local Flood Authority on the 10 June 2026. A technical note was provided setting out the common interfaces with watercourses, which are limited to 2 No. ordinary

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		Interaction with the Lower Thames Crossing Scheme 3.8 The applicant has not provided sufficient information regarding the cumulative impacts associated with the Lower Thames Crossing project. The applicant must consider and demonstrate the potential cumulative impacts on watercourses and drainage networks, combined flood risk implications (various sources of flooding including overland flow), interactions between proposed drainage infrastructure, and potential impacts on receiving watercourses.	watercourses, and describing how the potential for cumulative effects on these receptors has been assessed and mitigated.
REP5-275	Thurrock Council	Appendix B – Comments on the Applicant's Updated Documents 4 Comments on Applicant's Comments on Responses to ExQ1 4.1 The Applicant responded to the Council's comments regarding NV 1.13 EACN and Tilbury North Substations operational noise assessment in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299]: "BATNEEC is not a policy of National Grid, and this terminology is not stated within 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] or the associated operational noise assessment appendices [APP-259] and [APP260], for the proposed new EACN Substation and Tilbury North Substation, respectively. The assessments are worst-case and based on highest specification noise level data for noise generating equipment (e.g. transformers). Based on this worst-case, the assessments indicate that mitigation of substation noise sources is required to avoid significant adverse effects. Standard noise mitigation for transformers is acoustic enclosures, and these are in the design principles for both proposed new substations. With enclosures, adverse and significant adverse effects can be avoided from both sites, even assuming worst-case transformer sound levels. Specifically at the proposed new Tilbury North Substation, noise levels are predicted to be comfortably below background sound levels during both daytime and night-time periods and would therefore meet the aim stated by the local authority. Noise mitigation at substations is committed to via commitment NV21 of 7.2 Outline Code of Construction Practice [Revision D], which has been updated at Deadline 4 to state: 'The proposed new substations will include any required noise mitigation measures by design to ensure significant adverse effects are avoided and adverse effects are mitigated and minimised. This may include plant selection, siting, screening, and enclosures, as appropriate'." 4.2 The applicant's response is noted. 4.3 The applicant has confirmed that the operational noise assessments are based on worst-case plant noise data and that mitigation measures, including acoustic enclosures, are incorporated within the design principles for both substations. This provides some confidence that suitable mitigation can be	The Applicant notes this response and has updated commitment NV21 of 7.2 Outline Code of Construction Practice [Revision F] at Deadline 6 to include for provision of: • Detailed operational noise assessment based on the final plant specification, layout and operational characteristics • Defined operational noise limits at identified noise-sensitive receptors, derived in accordance with BS 4142:2014+A1:2019 • Post-installation verification monitoring to demonstrate compliance • A mechanism to secure additional mitigation should the approved limits not be achieved.

Examination Library ID	Name	Matter	Applicant's Comment
		incorporated into the final design. The commitment contained within NV21 is also welcomed. 4.4 Whilst NV21 this establishes a general commitment to mitigation; it does not itself secure specific operational noise limits or provide a mechanism for demonstrating that the final design achieves the outcomes predicted within the Environmental Statement. 4.5 Accordingly, the Council continues to support the inclusion of: • A requirement for a detailed operational noise assessment based on the final plant specification, layout and operational characteristics; • Defined operational noise limits at identified noise-sensitive receptors, derived in accordance with BS 4142:2014+A1:2019 • Post-installation verification monitoring to demonstrate compliance; and • A mechanism to secure additional mitigation should the approved limits not be achieved. • Any such requirement should be discharged by the relevant planning authority.	
REP5-275	Thurrock Council	<i>Appendix B – Comments on the Applicant's Updated Documents</i> <i>5 Comments on updates to the Environmental Statement</i> <i>Appendixes and Figures</i> 5.1 A number of the documents issued at Deadline 4 appear to contain corrections to previous versions although no revision has been provided to explain what these corrections are. These documents are as follows: • 6.13.F1 Environmental Statement Figure 13.1 - LVIA Study Area and Landscape Designations Revision B [REP4-158] • 6.13.F6 Errata Environmental Statement Figure 13.6 - Landscape Character Types and Landscape Character Areas Revision B [REP4-159] • 6.13.F7 Errata Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints Revision C [REP4-160] • 7.4 Errata Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan Revision B Part 1 – Part 2 [REP4-176 and REP4-177] 5.2 This is required in order to fully understand what the amendments are and why they have been carried out. 5.3 With regards to the updates to the residential visual amenity assessment in ES Chapter 6 Volume 13 [REP4-148 to REP4-157], the Council notes that field surveys for properties taken to step 4 have all been carried out from public locations only. The Council would like to understand if site visits have been conducted inside these properties to fully inform the stage 4 assessment.	The Applicant confirms that 8.6.2 Deadline 4 Cover Letter [REP4-001] provides commentary on the reason for updates to the documents listed by Thurrock Council. 6.13.F1 Environmental Statement Figure 13.1 - LVIA Study Area and Landscape Designations [REP4-158], as required under APFP Regulation 5(2)(1), has been updated to show the revised Order Limits following the ExA's procedural decision to accept the change applications. The following documents, listed by Thurrock Council, form Appendix A of 8.1 Errata List [REP4-185]: • 6.13.F6 Errata Environmental Statement Figure 13.6 - Landscape Character Types and Landscape Character Areas Revision B [REP4-159] • 6.13.F7 Errata Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints Revision C [REP4-160] • 7.4 Errata Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan Revision B Part 1 – Part 2 [REP4-176 and REP4-177]. Justification for the updates is detailed within 8.1 Errata List [REP4-185]. 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 [APP-233 and APP-234] 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 3.2.13 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126 to REP5-134] with

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			fieldwork from publicly accessible areas (i.e. public rights of way and public highways) used to verify this information where necessary. Fieldwork was undertaken in winter 2025. This enabled the worst-case scenario to be assessed, on the basis that any available screening offered by deciduous vegetation was at a minimum during winter months.
REP5-276	Tritton Farming Partnership LLP	1. Alternative Technologies This is highlighted given the enormous technological change in the last 4-6 years when NG first developed its “Preferred Route” as East Anglia Green in 2022. Many other companies are going bust as a result of these changes and others such as Nvidia have increased their value by \$5trillion. Standing still is not an option in these rapidly changing times, yet this project is broadly unchanged and should last over 50 years. All solutions on projects this large should be considered and continuously re-evaluated in light of technology change. Is a 180km line, mainly of 40-50m steel lattice pylons utilising 1950s technology, really the best the UK/NG can do? This technology is behind Europe and other parts of the UK. a. NG is proposing utilising the most damaging environmental, especially visual, solution to transport energy compared to the other main methodologies of subsea cables, underground cabling, increasing existing pylon capacities with new conductors and cables, or replacing old pylons with new pylons, conductors and cables. b. NG has not made any technological changes since East Anglia Green began 4-6 years ago. c. Large steel lattice pylons are no longer widely adopted in the Western World at scale in populated areas. d. Very little analysis has been shown of combining partial onshore and offshore routes in this project. One solution may not fit all, e.g: pylons in low density areas in Norfolk and then offshore in populated Essex. What energy transmission projects have happened in last 4-6 years i. EU, particularly Belgium and Netherlands, are using advanced conductors to reconduct existing power lines with much larger capacity. NG has published little information on why this is not possible. ii. NG has been replacing overhead pylons with underground cables in UK AONBs, an admission of the flaws of large pylons. iii. Viking link from UK to Denmark, 760 km of HVDC cables so technology is proven. iv. 4,300-mile cable to Singapore from Australia approval from both Governments. v. North Sea link 720km power cable between Norway and UK becomes operational.	The multi-factor evaluation of all alternative options confirms the same conclusion. 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Section 5 Options assessment process, pages 47–49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socio-economic 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 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. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in 7.17 Strategic Options Backcheck and Review [APP-355] (Chapter 5 Strategic Option Overview pages 45-47 summarises the options), 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] (entire chapter), and 5.15 Design Development Report [APP-122] (Section 2 Project-Wide Consideration Relevant to Design Development pages 17–33 and local issues addressed in Section A-H siting and routeing alternatives). More localised design variants have also been considered. The Applicant considered the following options, as well as AC overhead lines: • An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal • AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20–30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed • High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection. Appendix D: Economic Appraisal of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] pages D1–D14, presents the costs, based on a transparent economic appraisal. The Applicant uses HVDC for applications where appropriate, like in the examples provided where the capacity required is economic and distance is greater than 100 km then HVDC can be a viable solution. In the case of East Anglia the capacity required is 6 GW and other connections to the AC network

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		The first commercial subsea HVDC link celebrated its 70th anniversary in 2024 having been built in 1954 between the Swedish mainland and Gotland by Vattenfall. So, Sweden built a subsea HVDC 70 years ago and National Grid struggles to go around the North Sea coast and has quoted technology as a reason as well as cost? Has anyone spoken to Vattenfall for their opinions?	provide advantages to the network. This makes the AC co-ordinated solution for the higher capacities required the most appropriate solution as set out in 7.19 2023 - Strategic Options Backcheck and Review [APP-357] The Applicant has for 20 years used high temperature low sag (HTLS) conductors on routes where older pylons cannot achieve the highest ratings. The TS conductor is just one type of HTLS conductor from one manufacturer. The Applicant has been using the MATTHEW GZTACSR conductor for 20 years, for example, to maximise capacity on old routes. These HTLS conductors have been deployed for many years on legacy parts of the network. They operate at higher temperatures (typically 150–250 °C), allowing greater losses without breaching sag limits. This reflects the constraints of older pylons, which must use smaller conductor bundles to remain within structural weight limits. The only way heat is generated in the conductor is through power losses so HTLS conductors are designed not to sag when they heat up from higher losses due to smaller conductors. Where newer, structurally stronger pylons are available, the highest network ratings can be achieved more efficiently using standard conductors operating below 90 °C. These lower-cost conductors are installed in bundles to minimise electrical losses while maximising capacity, delivering better value to consumers. Newer structures therefore achieve maximum ratings with standard conductors and lower losses. In East Anglia, both the existing and proposed network can reach the highest required ratings using these lower-loss, standard conductor solutions. As stated in paragraphs 3.2.9 to 3.2.12, page 25, of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-032]: <i>‘There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission, of 5,000 amperes, being the highest available equipment. This equates to:</i> <i>• A capacity on a single circuit of 3,465 megavolt-ampere (MVA)</i> <i>• A double circuit of 6,930 MVA</i> <i>• Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.</i> <i>The current post-fault capacities of:</i> <i>• EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW</i> <i>• EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.</i> <i>These circuits are operating within about 300 MW of the maximum capability, and therefore, new infrastructure is required to meet the deficits.</i> <i>Given the system indicated above is operating within 300 MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected, is set out in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]:</i> <i>• LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings</i> <i>• TS Conductor — High Temperature Low Sag (HTLS) conductor</i>

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			• <i>Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors</i> • <i>Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation</i> • <i>EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages</i> • <i>Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.'</i> The Applicant made it clear the existing network cannot be enhanced further as it is maximised to the 5,000 A rating currently. Therefore, reconductoring in East Anglia has been maximised to 5,000 A rating; where reconductoring is being done on the Applicant's system it is to improve circuits to meet this maximum 5,000 A rating limitation. Where circuits are operating below this limit reconductoring is always considered, including using HTLS conductors where the pylons cannot meet the 5,000 A rating with standard conductors. The triple Araucaria conductor, which is a 700 mm² conductor carried in a three-wire formation, operating at 75 °C, can meet the 5,000 A year-round rating. Where the Applicant uses HTLS conductors in double formation with conductor sizes below 700 mm², the resistivity of the conductor which is proportional to the total cross-sectional area of the conductor bundle increases. This means that 5,000 A cannot be achieved without conductor operating temperatures closer to 200 °C. This gives rise to higher system losses, which impact consumers. Therefore, using HTLS has to be a balance of system need, transmission infrastructure and cost to consumer. Where the system can accommodate the maximum 5,000 A rating with traditional conductors, they are chosen to minimise electrical losses while maximising capacity, delivering better value to consumers.
REP5-276	Tritton Farming Partnership LLP	2. Cumulative effect of Great Waltham and TFP Land, including Lions (Lyons) Mineral Site TFP asks the Planning Inspector to look at the cumulative effect of the issues at Great Waltham and Great Leighs as they are adjoining land parcels and landowners both proposing the same NG solution due to new factors since 2023. So far National Grid have separated them as two different areas with separate problems. When viewed together the argument for the NG Great Waltham Alternative Route (aka Western Route) becomes much more compelling. • NG claim that there is no new factors since 2023 to relook at this alternative route despite requests from Chelmsford City Council, Micklem Family, Cllr Mike Steel, TFP and many others. The Lions Mineral site NG admits was not known in 2023 and clearly Great Waltham heritage and complexities are substantial and weren't all known in 2023 so new factors have arisen since 2023 so this alternative route should be relooked at. • NG claims Great Waltham Alternative Route (and others), in Document: 7.21 2024 - Design Development Report for the	The Applicant notes the opinion of the respondent but does not agree with their conclusions. The comparison of alternative routes was made based on an equivalent level of investigation at the time and considering the cumulative position by the comparison of whole sections between common start and end points. We acknowledged (paragraph 9.2.4 of 5.15 Design Development Report [APP-122]) the potential for some reduction of some heritage effects but with the introduction of such effects on a Scheduled Monument east of Howletts and of Pleshey Castle and listed buildings in Pleshey. We have a different position on community effects to the respondent and do not consider the difference to be as pronounced with residential property affected on both routes. We also note that it is not surprising that further assessment detail has been identified for the preferred route, as this has been subject to further study, but it cannot simply be assumed this means the respondent's preferred alternative has a more acceptable balance of effects. The Applicant presents a scheme that it considers is capable of securing consent against the relevant Policy and in line with its regulatory duties and decision-making criteria as relevant. This balanced decision making considered all material factors (environmental, socio-economics, technical and cost). When considering new information about the Project, there are various question to be considered. These include: Is it clear that the new information means that the existing

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		Project Final Issue A Para 5.4 .178-5.4.187 "...would increase effects, compared with the 2023 preferred draft alignment, to varying degrees on woodland, residential amenity, and heritage assets". This contradicts the information below. 7.21 2024 - Design Development Report for the Project Final, Issue A, August 2025 and NG Document: 5.15 Design Development Report - Final Issue A - August 2025 A states Great Waltham Alternative Route: - would be 2.5-3.0 km longer, 8 or 9 pylons extra, hence increased costs. TFP says this is cost mitigated by the route having no impact on Lions mineral site. - Reduces heritage impacts and avoids Langley's Park, Grade 1. - Micklem says it reduces heritage overall by 60 properties approx. even more if Goodmans Lane heritage assets (see below) are added to Great Waltham heritage assets. - Impacts the Wilderness Foundation HQ - TFP says this is dramatically reduced since the purchase of Mann Wood in 2024, a new factor as unknown in 2023, which is approx. 90 acres bigger and located a mile away. -Avoids pinch points (incl. Great Waltham Pinch point) between settlements and clusters of properties TFP agrees - It reduces impact on residential amenity compared to 2023 preferred draft alignment due to less houses being impacted TFP agrees - Located within a less sensitive landscape TFP agrees TFP would argue these are all positives and NG's Alternative Great Waltham Route, is more Compliant with Holford Rules 1,2 & 7 with Shetl 2003 Clarifications. NG should once again investigate this alternative and its reasons for not choosing it now.	preferred route is unlikely to be considered acceptable in Policy terms? Will the alternative meet the Project need case which may encompass aspects including transmission capability and programme? Importantly there is no requirement for the Applicant to present the alternative with the lowest level of environmental effects. The Applicant notes the information about the Woodland school but also points out that this was never identified as a critical decision factor. In respect of the Lowley's minerals site, at Deadline 5 (10 June 2026) the minerals site referred to has no confirmed planning status, though is acknowledged to be under consideration. The Applicant recognises the potential change in policy status and also the potential claim for sterilised resources and is investigating (and expected to confirm) a localised change in route and pylon positioning to reduce the potential for, interaction. Whilst noting this would reduce the differential in route length between the Project alignment and the respondent's preferred alternative it remains longer. The Applicant's position is that this does not lead to a conclusion that the Project route is unacceptable. Even if others would take a different view then there needs to be careful consideration of the impact of making a change. It is clear that this would be likely to lead to at least a two year programme delay. The Applicant's position is the programme delays from a change at this stage, for a limited change in effects that are not inconsistent with policy, would not meet the Project need case given the status as a critical national priority project.
REP5-276	Tritton Farming Partnership LLP	3. Lions (Lyons) Minerals Site Alternative Route a. TFP and NG have been discussing a Route B to reduce the impact on the Lions mineral Site. b. 8.11 Approach to Scenarios Revision B Clean Version May 2026 Table 2.6 states In "order to provide clarity for detailed design, affected land owners, and in light of the substantially reduced sterilization associated with scenario B, the applicant confirms the change to scenario B will be taken forward." TFP was unaware this decision had been made. c. TFP has been shown some ideas on Route B in a meeting, but no designs have been completed or left until an email this morning. This makes it hard for TFP to comment and a meeting request to discuss it next week.	The Applicant must complete various technical and assessment checks before it is able to share detailed alternative proposals and must be confident that the alternative can meet technical and environmental constraints. The design process can also mean that taller pylons may be required to achieve the span length and clearance sought or that additional separation to features may be necessary to avoid impact to tree root zones or avoid tree removal for temporary works such as stringing areas. It is understood that a further design has been shared with further discussions planned. The Applicant can confirm it will only seek the rights necessary to construct and operate the Project.

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		d. TFP was also unaware that Route B would require taller pylons. This has not been discussed or agreed. e. More collaborative work must be done on this Route design including: haul road, surveys, pylons height and locations. TFP has requested Route B pylons are tight against the woodland, not all is ancient woodland and a pylon at the Southern most point within the red corridor. f. On completion of agreed designs, NG can reduce the acquisition area, the temporary and permanent rights on TFP land, which are at present excessive as designed for two possible routes.	
REP5-276	Tritton Farming Partnership LLP	4. TFP Housing Site NG states the Chatham Green site was not included in the emerging Chelmsford local Plan. TFP, remains of the opinion, that the site should be and is of interest to Chelmsford City Council (CCC), who are experiencing rapid growth in housing and other needs, especially large sites. It is very difficult to allocate a large housing area when there is uncertainty around a DCO proposal to build a very high voltage power line over the housing area as it affects desirability and thus certainty of delivery. A re-routing of the N-T away from the area would dramatically increase the desirability again and moving to Route B also reduces the sterilization of housing if Route B is taken to the most Southern point at the bottom of the red corridor as requested by TFP. TFP will continue to engage with CCC as NG plans progress, including if Route B is adopted as TFP believes the reasons given by CCC can all be dealt with: • relatively isolated from the strategic highway network and new railway station. TFP points out the new railway station Beaulieu Park is 3 miles away and the Chelmsford North East Bypass phase 2 has direct roundabout access to TFP land • Landscape capacity and sensitivity concerns. TFP believes these should not be strong concerns. • There is limited wastewater capacity to accommodate this development. TFP has land adjoining wastewater plant to facilitate this expansion. • Reliance on car and employment opportunities would be less accessible to the wider population. TFP says that there is already a cycle route alongside and direct access to the new Chelmsford North East bypass. These apply to nearly all large new garden village style developments and are solvable.	The design detail of option B has been circulated to the respondent following completion of the necessary checks. With in principle agreement from the respondent on the revised arrangements this is expected to be confirmed as the basis for progressing the Project. The Applicant is unable to take into consideration more speculative development aspirations (regardless of the merits promoted by the respondent) to avoid spurious plans being identified as a basis to seek to frustrate necessary infrastructure reinforcements. The Applicant previously commented on the planning status of the land at Chatham Green at 8.8.1 Applicant's Comments on Written Representations [REP2-029]. In the interim period Chelmsford City Council has submitted its Local Plan for examination. The Applicant notes that the submission Local Plan does not include the land at Chatham Green as a potential housing allocation. The Applicant also notes that there are no current planning applications for that site.

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REP5-276	Tritton Farming Partnership LLP	5. Environmental & Visual 1. TFP notes the lack of any visualisations of a sensitive area that NG hasn't done a visual assessment from the area where Goodmans Lane meets Paulk Hall Lane despite this being highlighted by both Chelmsford City Council (7.2 Response June 2024) and TFP of a cluster of listed assets and their closest distance to the corridor as estimated by NG with their assessment in 6.11.A2 Environmental Statement Appendix 11.2: a. Goodmans farmhouse (1122135) 65m – low adverse impact b. Goodmans Barns (1171336) 65m– low adverse impact c. Barn at Hole Farm (1171364) – 110m– low adverse impact d. Hole Farmhouse (1338437) – 115m– low adverse impact e. Lowleys farmhouse (1305642) – 260m– low adverse impact f. Ponds (6404)– 40m – medium adverse impact g. Goodmans Lane (6602)– Protected Lane – low adverse impact h. Paulk Hall Lane (6601) – Protected Lane – low adverse impact TFP does not believe that the impact of the pylon line so close to these listed buildings will have a low adverse impact, and requests a site inspection of this area especially as NG states that as a low value asset the setting of the protected lane was not considered in 7.13 CCC response June 2024, 8.8.1 Applicant's Comments on Written Representations Final Issue A - March 2026. CCC in Protected Lane Study September 2009 state that Planning permission will be refused for development that would have an adverse environmental impact upon Protected Lanes. In addition, both Goodmans Lane and Paulk Hall Lane are closed during construction with large impacts on TFP. NG state that temporary crossover bellmouth is proposed to be installed on each of these routes. There is a drop of about 9 feet between the banks and the lanes making this almost impossible for the haul road to cross using this methodology as it would either be in the sky or blocking the lane with its disastrous implications The re-routing of the route to the Great Waltham Alternative route would avoid the significant engineering required over Goodmans Lane and the environmental impact in this area.	The Applicant is confident in the robustness of its assessments which have been reviewed by Historic England. Even if individual assessments are judged by others to be somewhat higher, the Applicant's position is that this would not change the conclusion drawn regarding the preferred route alignment. The access arrangement will be developed as part of Detailed Design but it is not expected that road closures will be required. Some traffic management may be necessary but this is normal for projects requiring new bellmouths.
REP5-276	Tritton Farming Partnership LLP	6. Administration a. The size and importance of the intrusion of the route have meant that TFP has to spend a large amount of time trawling documents and meeting DCO deadlines and this has an effect on the business and individuals. b. TFP has been repeatedly told by Agents and advisors that The Heads of Terms should not be signed in their current form because of the unreasonable terms presented. c. Plans shown in meetings have not been left for TFP to review and provide comment on. d. SOCG documents have been turned a number of times; however, NG's appointed agents, Fisher German, continue to	The Applicant may bring draft plans to meetings to help aid discussions but these may not be able to be left with the stakeholder as they are not formal issue communications or final plans, and may therefore be subject to change. The Applicant is working with Tritton Farming Partnership LLP to agree a Statement of Common Ground (8.3.32 Draft Statement of Common Ground - Tritton Farming Partnership and Brett Aggregates (Lowleys Farm Mineral Site) [REP5-178]) - which appropriately reflects both parties' positions, to be signed and submitted to the Examining Authority at Deadline 7, as per the Rule 6 letter [PD-009].

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		adopt an unreasonable and overly pressurised approach by requesting that TFP respond to SOCG comments within unrealistic timeframes. For example, at Deadline 1, TFP was given just 24 hours to review documents which had been with NG for approximately eight weeks. TFP remains willing to engage constructively with NG to reach a suitable solution. However, given the significance and complexity of the impacts on TFP, should NG continue with its current approach to the SOCG, through no fault of TFP, we are sceptical as to whether the SOCG can be concluded by Deadline 7 as requested by PINS.	
REP5-279	Ward Hadaway LLP on behalf on Northumbrian Water Limited (NWL)	Book of Reference [REP4-049] ("BoR") ESW does not agree with the classification of plots 3/91, 3/93 and 3/96 in the BoR submitted by the Applicant at Deadline 4. These were identified as "Class 7" land. These plots are critical to the operation, maintenance, and access of Little Waltham Pumping Station, which is an integral component of ESW's waterway network. The current classification fails to recognise the essential role this land plays in enabling ESW to discharge its statutory duties and maintain safe and effective operations. Any interference with, restriction of access to, or acquisition of rights will materially impair ESW's ability to perform its statutory functions including responding to incidents or emergencies. Accordingly, ESW strongly opposes these classifications in the BoR, and considers that the plots should be reclassified as "Class 8" land. This would more accurately reflect their operational importance and ensure appropriate protection for infrastructure supporting essential public utility services.	The Applicant has previously, and continues to, offer the Class 8 assignation to plot 3/96 which will be incorporated into the draft DCO at D7. It is the Applicant's understanding that concerns relating to plots 3/91 and 3/93 relate to access. The Applicant has offered a binding commitment to maintain unrestricted access at all times to the Little Waltham Pumping Station and this will be reflected in the Protective Provisions included at Deadline 6 Discussions are ongoing with the respondent.
REP5-279	Ward Hadaway LLP on behalf on Northumbrian Water Limited (NWL)	Alignment with Anglian Water's Position ESW confirms that AW's previous submissions, including those in response to question 1.S4 in ExQ1 are broadly aligned with those of ESW, particularly regarding concerns about statutory undertakers' ability to continue performing their functions if the Applicant's powers are exercised without adequate protections in place. ESW shares the concerns raised on protecting operational assets, safeguarding access rights, maintaining network resilience and securing robust protective provisions to ensure development consent powers do not impede statutory duties.	The Applicant is progressing legal agreement negotiations with both parties which seeks to address the full suite of concerns listed by offering adequate protections. These negotiations are ongoing with the intention to seek to formalise and submit these Protective Provisions within the Examination window. A full response on this issue is included in the [8.5.10 Applicants response to CAH3 Hearing Submission] also submitted at Deadline 6.
REP5-314	Yvonne Rann	I want to know why you require a third of my garden if pylons are erected in the field I overlook No one has requested to survey my garden and explain this. I would like to know exactly why a third of my garden is required if pylons are erected in the field I overlook No one has explained this to me No one has requested a visit to survey this area.	The rights being sought by the Project are for UK Power Networks enabling works which relate to plot number D-7/91 which is in relation to the Affected Party's freehold interest. These rights as described in the 2.2 Land Plans [Revision E] are Class 4 - Compulsory acquisition of rights - Overhead line and underground cable system. The Applicant will raise the matter with UK Power Networks to prioritise engagement.

Appendix A. Applicant's Comments on Appendix B of Ardleigh Parish Council and Little Bromley Parish Council Deadline 5 submission [REP5- 227]

Appendix A

Applicant’s Comments on Appendix B of Ardleigh Parish Council and Little Bromley Parish Council Deadline 5 submission [REP5-227 – Combined Cumulative Impact Ardleigh & Little Bromley (ALBA)]

2.1.2 Table A.1 provides the Applicant’s response to Appendix B Combined Cumulative Impact Ardleigh & Little Bromley (ALBA) of the Ardleigh Parish Council and Little Bromley Parish Council Deadline 5 submission [REP5-227].

Table A.1 Applicant response to Appendix B of REP5-227

Matter	Applicant’s Response
5.The Parish Councils submit that the cumulative effects experienced within ALBA are not properly understood when the various projects are considered in isolation and that a more holistic assessment is required in order for the Examining Authority to reach a fully informed recommendation. 6.There are five projects which converge in the same small rural area within ALBA a. EACN (National Grid): Ardleigh/Little Bromley / Lawford area b. North Falls substation: adjacent to EACN c. Five Estuaries substation: adjacent to EACN d. Battery Storage unit: adjacent to EACN e. Tarchon converter station: within 5 km of EACN, refined search centred on Little Bromley 7. In effect, this is a planned energy hub concentration within the ALBA. 8. To date North Falls, Five Estuaries the Battery storage unit and Tarchon have been treated as separate projects to the National Grid Norwich to Tilbury project and yet they contribute significantly to the overall negative cumulative effect of siting the EACN in the ALBA. 9. Although the precise location of the Tarchon converter has yet to be decided we know it will be within 5km of the EACN and that it will cover 10ha. The combined land take for the five projects will be circa 95ha or between 130 and 150 football pitches. Most, if not all, will be on Grade1 BMV land which is currently farmed. 1 10. Of course, within the ALBA it is not just the land take of the five projects but also the 5km of Underground cable route, up to 220m wide in some cases and the 21 50m high pylons and cable arrays. In addition, there will be multiple haul roads, access roads, construction compounds and drainage systems. 11. This will result in a networked industrial landscape.	Following the inter-project cumulative effects assessment of individual developments with the Norwich to Tilbury Project, the Applicant has undertaken a Stage 5 assessment of clusters of other development. The assessment looked at where at least two or more other developments identified in the shortlist of other developments could affect a common receptor (e.g. a Visual Receptor Area (VRA)) with the Project. The inter-project cumulative effect of clusters of developments is detailed in Table 2.2 of 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. Table 2.2 summarises the effects of the Project on the receptors taken from the environmental topic chapters [APP-138 to APP-271] and then the combined effect of other developments on the same receptor. The table also considers if additional mitigation is required. Significant landscape and visual effects are identified within the Bromley Heaths Landscape Character Area and VRA C13 Little Bromley as a result of development which includes North Falls and Five Estuaries Substations and Tarchon Interconnector.
Landscape & visual impact 12. The multiple substations, converter station and battery storage will result in large industrial buildings occupying a vast area of previously flat agricultural landscape with trees and hedgerows. The pylons and the cable arrays that will surround the village on three sides are the most visually damaging as most are angle pylons. 13. This will result in a loss of the rural skyline and the industrialisation of the countryside. Permanently adversely impacting the rural nature and setting of the ALBA.	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. The Applicant has sought to reduce effects on landscape and visual receptors through embedded mitigation measures, including the proposed Environmental Area around the East Anglia Connection Node. The Applicant has engaged with the North Falls and Five Estuaries projects on matters of design, as set out in response to DES 2.1 in 8.9.2 Applicant's Response to Second Written Questions [REP5-211].

Matter	Applicant’s Response
Land use & agriculture 14. The land take is BMV land, predominantly grade 1 with some grade 2 & 3. Many of the farms will become unviable as fields with pylons will lead to fragmentation of fields Those in the undergrounding swathe will find that the ground will be permanently damaged 15. There are 4 active mineral quarries currently and 7 other potential sites have been identified for future extraction of sands and gravel including very high value and rare silica sands. Some of which could be lost as a result of the developments. 16. This will result in long-term degradation of agricultural viability and loss of some of the most valuable agricultural land in the country. 17. There is also potential loss of minerals,	During route optioneering, the impacts on agricultural land, including on agricultural land-take (such as sterilisation) 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]. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [APP-085]). Temporary disruption to farming operations during construction would be reduced through good practice, such as maintaining/providing alternative access and water supplies, reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [Revision F]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project, as stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. The impact on minerals is assessed in 6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183] and 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]. The assessment concludes that effects on existing minerals site, candidate sites and safeguarded areas are not significant.
Traffic & construction 18. Simultaneous construction phases likely over 5+ years with road closures, noise and vibration and unprecedented volumes of construction traffic on rural lanes and through villages. 19. Proposed working hours from 7am and 7pm with slightly reduced hours at weekends and Bank Holidays. 20. This will lead to sustained disruption over multiple years and risk the health and wellbeing of the communities of the ALBA	7.2 Outline Code of Construction Practice [Revision F] includes a range of commitments relating to construction noise and vibration. Commitment NV01 requires the Main Works Contractor(s) to employ Best Practicable Means and follow good construction practices. Commitment NV05 requires the preparation of detailed construction noise and vibration assessments, including the identification of appropriate mitigation measures and any monitoring requirements. These will be documented within a Noise and Vibration Management Plan and agreed with Tendring District Council (and other relevant Local Planning Authorities) prior to the commencement of works via Requirement 4 of 3.1 Draft Development Consent Order [Revision F]. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B] includes an assessment of the impact of the Project in relation to noise, community safety (traffic) and access to social infrastructure and during the construction phase. It also includes a specific assessment summarising potential impacts on the mental health and wellbeing of local communities during the construction phase. No significant effects have been identified on either physical or mental health and wellbeing, once a range of mitigation measures has been taken into account as set out in 7.2 Outline Code of Construction Practice [Revision F] and 7.3 Outline Construction Traffic Management Plan [Revision E].
Drainage & water environment 21. Large impermeable surfaces, extensive trenching and altered drainage patterns will create flood risk and groundwater disruption.	The impacts of trenching and the introduction of new temporary and permanent areas of impermeable land cover have been subject to detailed assessment within 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]. Rainfall runoff from impermeable surfaces will be captured and conveyed to a range of Sustainable Drainage features, to be infiltrated back to ground where conditions are suitable or discharged to nearby watercourses at pre-development rates. This would prevent any increase in flood risk.
Ecological fragmentation 22. Hedgerow removal, wildlife corridor severance and habitat loss will lead to a breakdown of rural ecological networks	Potential impacts resulting from hedgerow removal, wildlife corridor severance, habitat loss and overall impacts on ecological networks have been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Most of the habitat loss would be temporary and will be replaced on completion of works. Replacement planting would be provided with no lasting effects from habitat fragmentation as recorded in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].

Matter	Applicant’s Response
Cumulative “energy hub” effect 23. The ALBA becomes one of the largest electricity infrastructure hubs in the UK a. National Grid hub (EACN) b. Two offshore wind substations c. One international interconnector converter station d. Battery Storage	As stated above, the inter-project cumulative effect of clusters of developments is detailed in Table 2.2 of 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163].
24. This is a deliberately planned strategic industrialisation of a rural parish landscape Over-concentration of infrastructure 25. The Parish Councils object strongly to the unprecedented concentration of major energy infrastructure proposed within the Ardleigh and Little Bromley area. 26. The Norwich to Tilbury project establishes the East Anglia Connection Node (EACN) as a large new 400 kV substation hub. This is then compounded by the proposed North Falls and Five Estuaries offshore windfarm substations, both of which are to be located adjacent to, and dependent upon, the EACN. 3 2 7. The Tarchon Interconnector further intensifies this concentration by proposing a converter station within a 5 km radius of the same node, with consultation material indicating a refined search area centred on Little Bromley. 28. Taken together, these projects would result in the co-location of: a. A major National Grid transmission hub b. Two large offshore wind substations c. An HVDC interconnector converter station 29. This represents a level of infrastructure concentration wholly out of scale with the rural character of the area.	The Applicant disagrees with this characterisation. A robust and considered routeing and siting exercise has been undertaken that has been subject to consultation and careful consideration of feedback culminating in the Project submitted. This has balanced technical, environmental, socio-economic and cost considerations. Studies considered a range of sites with the final location subject to appropriate consideration of environmental effects and necessary mitigation.
30. National Grid has updated it’s response to cumulative effects in the document: Document: 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update. 31. The Parish Councils consider that this response update is still inadequate for the following reasons: 32. As in Exa Q2 Gen2.3 we question the assessment methodology, For example in Table 2.2 Assessment of inter-project cumulative effects from clusters of other development with the Project (see below) there are many examples of where the Significance of Effect is rated as Major adverse and significant and yet under the heading Additional Mitigation it states No additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 Landscape and Visual [APP-226] 33. A specific example of this is for effects on Bromley Heaths LCA (Project Section C) which covers all the projects that affect the ALBA i.e. the EACN, North Falls, Five Estuaries, Tarcon and Battery Storage, Martells Quarry extension, Food Storage facility and Asphalt plant, as can be seen from the table below the inter project cumulative effect is rated: Major adverse and significant but Additional Mitigation is: No additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 –Landscape and Visual [APP-226]	The assessment methodology was agreed in 6.20 Scoping Opinion [APP-297] and the assessment methodology is detailed in 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects [REP4-163]. The Applicant’s approach to the mitigation hierarchy is set out in full in Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. Definitions of embedded, standard and additional mitigation measures are provided in paragraph 2.5.7. The original response to GEN 2.3 is set out within 8.9.2 Applicant's Response to Second Written Questions [REP5-211].
34. This is a common theme throughout the project. The reason for no Additional Measures appears to be the reliance on 6.13 Environmental Statement Chapter 13 –Landscape and Visual [APP-226] which explains the three levels of mitigation: a. Embedded Mitigation b. Standard Mitigation c. Additional Mitigation 35. National Grid maintains that no Additional Mitigation is required as even when there are “major adverse effects” identified they are covered by Embedded or Standard Mitigation.	The Applicant’s approach to the mitigation hierarchy is set out in full in Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. Definitions of embedded, standard and additional mitigation measures are provided in paragraph 2.5.7. The consideration of alternative route alignments and technology changes around Ardleigh and the East Anglia Connection Node are summarised in paragraphs 5.5.84 to 5.5.104 of 7.20 2023 - Design

Matter	Applicant’s Response
36. This assumption is highly questionable. For example, extracted from APP - 226: <i>13.6.2 Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features, including landscape and visual features, as far as reasonably practicable. 13.6.3 National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. 13.6.4 Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in Chapter 4: Project Description (document reference 6.4). Embedded measures relevant to Landscape and Visual include:</i> • <i>Sensitive routeing and siting of the alignment and Order Limits – as far as practicable, effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced</i> 37. Embedded Mitigation has clearly not been applied to The Norwich to Tilbury Project. In the case of ALBA and other locations on the route. 13.62, 13.63 and 13.6.4 (bullet 1) have clearly been ignored as there is little evidence that alternative routeing or locations have been seriously considered. The use of “as far as practicable” is the get out phrase that the ExA has picked up on. 38. As we have stated in previous submissions there has been no consultation or evidence that alternative routeing and locations have ever been properly assessed. <i>Standard Mitigation</i> <i>13.6.5 Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.</i> 39. Standard mitigation is in fact not mitigation at all as it is not applied to provide mitigation in a particular case but is just standard legally compliant construction practice generally applied	Development Report for the Project [APP-358] and paragraphs 5.4.120 to 5.4.127 of 7.21 2024 - Design Development Report for the Project [APP-359].
Safety and Security 40. All projects converge at the EACN at Ardleigh /Little Bromley and neighbouring Lawford which results in a large potential target for terrorism, with the ALBA becoming the potential victim of any ensuing explosion, fire or other related catastrophe. 41. The Tendring Peninsula is the sunniest and driest place in the UK and with tinder-dry crops and stubble fields for many months of the year, fire is always a hazard. Crop and stubble fires spread extremely quickly with "wildfires" becoming increasingly common in the UK - so any proposals must consider these issues and the impact/increased risk that construction and siting of electricity infrastructure will pose for local communities and the security of the nation’s power supplies. As witnessed in Ukraine, exposed clustered infrastructure is extremely vulnerable. 42. Access to the sites is along country lanes and fire and rescue services are many miles away. Battery storage is now known to be extremely difficult to control and extinguish if a fire occurs.	The Applicant acknowledges the Council's concerns regarding the concentration of energy infrastructure within the area. The Project has been designed and will be operated in accordance with the regulatory requirements, industry standards and security measures applicable to critical national infrastructure. The Applicant notes that a number of the developments referred to are separate schemes promoted by different applicants. Those developments are subject to their own planning applications, environmental assessments and regulatory requirements, and each applicant is responsible for demonstrating that its own proposals satisfy the relevant safety, security and resilience requirements. Appropriate operational, safety and emergency response arrangements are developed in consultation with the relevant statutory authorities and emergency services. The Project does not materially alter the existing security or safety arrangements applicable to the area, nor does it introduce a materially different operational risk profile. The Applicant therefore considers that safety and security matters have been appropriately addressed through the design, operation and regulatory framework applicable to the Project.
43. Ardleigh Parish currently in only 15% built on, and this generously includes agricultural buildings like glass houses. Little Bromley is even less developed. This is essential quantification of why we are classified as a 'rural parishes ', something that is cherished by residents and part of the USP of living here. 44. The Parish Councils believe that: a. Even though NG have produced tables which include projects that are in geographical proximity the cumulative harms are not being properly assessed	The Applicant recognises the rural nature of Ardleigh and Little Bromley and the value attributed to this by residents. The Project has been designed and assessed having regard to this baseline, and mitigation measures are secured through 7.2 Outline Code of Construction Practice [Revision F]. The Applicant considers that effects on rural character are appropriately managed and policy compliant. The assessment methodology was agreed in 6.20 Scoping Opinion [APP-297] and the assessment methodology is detailed in 6.17.1 Environmental Statement Chapter 17 - Cumulative

Matter	Applicant’s Response
b. When the assessment is combined it is focussing on the construction phase and maintenance but does not seem to appreciate the long-term cumulative effect on the communities of the sheer volume of new infrastructure. c. The construction and maintenance phase will be devastating but the permanent loss of amenity and rural character can never be restored to the communities. d. There is no proper integrated assessment of combined effects on: i. Ardleigh ii. Little Bromley e. Other neighbouring Parishes [Appendix A-E drawings not replicated here, please see REP5-227 pages 10 to14] 47. The Parish Councils consider that: a. The combined effect of these five projects represents an over-concentration of nationally significant infrastructure in a single rural locality, resulting in unacceptable cumulative harm. As well as a health and security risk b. Until a full, integrated cumulative assessment is undertaken, including maximum design scenarios across all projects, the proposals must be strongly resisted. c. These are not five separate projects, but a single, cumulative energy super-hub being created in a rural parish area. Appendix E shows the scale of current and proposed developments in the area.	Effects [REP4-163]. The Cumulative Effects assessment for Norwich to Tilbury has assessed the construction and operation (and maintenance) phases.

Appendix B. Applicant's Comments on Essex County Council Appendix 3 [REP5- 243]

Appendix B

Applicant’s Comments on Essex County Council Appendix 3 [REP5-243]

- 2.1.3
- Table B.1 provides the Applicant’s responses to Appendix 3 of the Essex County Council (ECC) Deadline 5 submission [REP5-243].
- 2.1.4
- Appendix 3 as submitted by ECC is titled ‘Response to Applicant’s Comments on Responses to ExQ1, Doc 8.4.10 (REP4-299)’. The tabular format as submitted by ECC is replicated, with a final column on the end added to provide the Applicant’s response at this deadline.

Table B.1 Applicant response to Appendix 3 of REP5-243

Ref	ExQ1	ECC Response	Applicant’s Response	ECC Latest Response [REP5-243]	Applicant’s Response
TT.1.20	Cumulative impacts: Are there any specific impacts from other projects which you consider could cause additional impacts and risk to the proposed development and do you consider these have these been addressed adequately by the applicant?	Therefore, ECC will want to ensure that the applicant commits to joining and engaging with the Developer’s Forum on the basis of the high level approach set out in our response to TT 136 below and commits to flexibility to adapt to changing conditions.	The Applicant has committed to joining and engaging with the Developers Forum in paragraph 6.6.2 of 7.3 Outline Construction Traffic Management Plan [Revision C].	The Applicant has not committed to the high level approach set out in our response to ExQ1 for TT 1.36 (REP3-078) in their latest Outline CTMP, Rev C (REP4-174). For clarity ECC required the following wording to be added to the Outline CTMP (APP-309): <i>“National Grid and the Main Contractor(s) commit to joining and positively engaging with a Developer’s Forum on the basis of the following high level principles:</i> <i>• The Developer’s Forum would be a regular monthly online meeting beginning as soon as the DCO is granted. It would be chaired by ECC with key members of the other NSIP Teams invited as well as other Strategic Site Teams, alongside relevant members of the Local Highway Authority and Planning Authority</i> <i>• The Forum would be attended by National Grid as scheme promoter alongside their Main Contractor(s) constructing the scheme</i> <i>• At critical times where programmes overlap National Grid and the Main Contractor(s) will attend more regular weekly or bi-weekly meetings for urgent discussions on collaboration</i> <i>• Funding will be provided for the time spent by ECC in organising and chairing the meetings over the life of the construction period of Norwich to Tilbury capped at £45,360 (based on monthly meetings) with any additional meetings charged at £105 per person</i>	The Applicant has provided a response to the developers forum in TT 1.36 in 8.4.14 Applicant’s Comments on Responses to ExQ2 [Revision A] , submitted at Deadline 6.

Ref	ExQ1	ECC Response	Applicant's Response	ECC Latest Response [REP5-243]	Applicant's Response
				- Commitment to provide flexibility to adapt to changing conditions as identified during the Developers Forum” - ECC request that the above is included in an updated version of the latest Outline CTMP, Rev C (REP4-174).	
TT.1.20	As above	ECC has raised concerns around a co-ordinated approach to workable AIL routes and that ECC would expect the review to have been completed prior to the end of the Examination so that workable AIL routes are defined. The applicant has confirmed their Contractor is aiming to complete this by the end of Examination assuming all relevant information is provided from the asset owners in a timely manner. Whilst ECC understand the caveat around ensuring sufficient information is available ECC believe that a position statement could be provided showing the routes on a map along with constraints as currently known (if not all information is available). This will enable an understanding of where there are particular issues on the network that need further work and how this impacts the various authority areas.	The Applicant notes ECC's request for maps showing the AIL routes and constraint locations, and draws their attention to 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans Sections A-B and D-G [APP-312 to APP-319] and Sections C and H [Revision B] which contain the information requested. The Applicant has and will continue to engage with ECC on this matter.	The point that ECC was trying to make was around having a complete route map from port to site to understand the wider constraints across all authority areas. This would then show any specific issues on the route as a whole and illustrate whether there is a viable route or if not what are the key blockers. In this way, all parties would have a full understanding of what needs to be fully resolved and have an understanding of any mitigation that has been agreed to determine whether this will impact the individual local authorities. For example, mitigation in the form of restrictions on strategic road or rail bridge structures may then impact on the local road network.	The Applicant has and will continue to engage with ECC on this matter, and will provide a response at D7. .
TT 1.36	Outline construction traffic management plan - 2 For the avoidance of doubt, please detail any matters in the outline CTMP [APP-309] which you consider requires amending and your proposed amendment. This could be in the form of a schedule or tracked changed version of the outline CTMP.	ECC provided proposed wording on a number of items to be included in the CTMP (APP3-078): - Restricting school drop off/pick up at a list of schools - High level principals relating to the Developer's Forum - A drive through review of the PARs prior to construction and review of structures in relation to HGVs - Variable messaging boards and commitment to providing more detail on AILs and	The Applicant has reviewed and included some of the wording but has omitted a large proportion of the requirements.	A comparison table has been produced which shows the wording that ECC proposed in REP3-078 for the CTMP (APP-309) against what has been included in the latest version by the Applicant (REP4-174). ECC has then provided a response next to each point. This is included within the Deadline 5 response at Appendix 3A.	Noted. The Applicant has provided a response to all points raised by ECC in Appendix 3A below (Appendix C).

Ref	ExQ1	ECC Response	Applicant's Response	ECC Latest Response [REP5-243]	Applicant's Response
		associated impacts to the community • A commitment to review movements against the assumptions in the TA and ES to ensure no additional impact occurs beyond what has been assessed • Update to Table 5.7 to include restrictions on HGVs using routes past schools (as identified above) • Commitment to review and discuss ways of reducing freight by road with the Local Highway Authority including a list of items for discussion • Add details of staff working hours and commitment to restricting access to staff during peak hours • Commitment to reviewing potential impacts due to inappropriate HGV parking associated with lack of nearby rest facilities for drivers • Inclusion of car parking supply and demand information in the access design approvals and cycle parking • Commitment to reinstate land to previous condition unless agreed otherwise • Comprehensive investigation of carriageway construction where permanent road widening is to occur • Table 6.1 to include monitoring of HGVs and construction workers (rather than just vehicles) • A list of potential corrective actions to be included • Update to wording on construction traffic operating outside of agreed hours to include workers • List of non compliance at section 6.4.1 to include construction traffic (worker traffic and HGVs) beyond those assumed in the TA and ES			

Ref	ExQ1	ECC Response	Applicant's Response	ECC Latest Response [REP5-243]	Applicant's Response
TT 1.38	In the SoCG with National Highways [REP1-048] a number of statements suggest that you are awaiting further information following requests to allow you to further consider the applicant submission. Please can you state if this additional information is now available to you and if not, what timescales you require to ensure an adequate response to any outstanding matters or concerns. Please can all local highway authorities address this same question.	ECC is waiting for the following information: - TROs to be reviewed when the following information is available: - Existing baseline traffic on diversion routes - Existing baseline traffic on the route that is to be temporarily closed - Proposed construction traffic (volume and traffic makeup) for diversion routes - Speed surveys for mitigation works - Parking demand surveys for parking restrictions - Timescales for each TRO listed in the DCO Schedule - Statement of reasons for each TRO proposal - Parking data to support the parking restrictions - Details of proposed shift patterns for workers - Junction mitigation proposals - Further consideration of Wick Lane proposals as the principle of using Wick Lane temporarily between the two proposed haul road access points is not accepted based on current option provided - Alternative design of Ardleigh Road based on passing bays (permanent)	TRO information: The Applicant has agreed to provide further clarification on the reasons for and anticipated durations of each of the TROs provided within Schedule 13 of 3.1 Draft Development Consent Order [Revision D]. This information will be provided by or before Deadline 5. The Applicant would welcome further discussions for reaching agreement on the TRO proposals with ECC following provision of these clarifications.	ECC has received some of the information set out in our response to ExQ1 (REP3-078) but there is still an amount outstanding as follows: - The Applicant does not appear to have committed to including all the information requested for the TROs. We require all the information to be able to provide a detailed review. ECC then need time to be able to review the information. - Details of shift worker patterns – this is required to include in the CTMP - Alternative designs for Wick Lane and Ardleigh Road Note the Applicant has provided the traffic modelling and survey Technical Note which ECC are to review. This will lead to discussions on junction mitigation.	This is noted by the Applicant. The Applicant has provided a technical note to Essex County Council providing additional detail on the Traffic Regulation Orders associated with the Project. The Applicant is and will continue to liaise with Essex County Council on this matter. The Applicant has responded to the point around shift worker patterns in Appendix C below. The Applicant has responded to the Ardleigh Road and Wick Lane Response in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A] submitted at Deadline 6.

Appendix C Applicant's Comments on Essex County Council Appendix 3a [REP5- 243]

Appendix C

Applicant’s Comments on Essex County Council Appendix 3a [REP5-243]

- 2.1.5
- Table C.1 provides the Applicant’s responses to Appendix 3a of the Essex County Council (ECC) Deadline 5 submission [REP5-243].
- 2.1.6
- Appendix 3a as submitted by ECC is titled ‘CTMP Text Updates Comparison with DL 4 version of the report (REP4-174) against our requested wording in REP3-078 – Appendix to ECC’s Response to REP4-299’. The tabular format as submitted by ECC is replicated, with a final column on the end added to provide the Applicant’s response at this deadline.

Table C.1 Applicant response to Appendix 3a [REP5-243]

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant’s Comment
Paragraph 2.3.5	The Contractor(s) commits to restricting HGV movements during school drop off/pick up times on PARs where there is school related activity for the following locations: – Quilters Infant & Junior School, Billericay, A129 and A176 – Billericay School (secondary), A129 and A176 – Cressing Primary School, B1018, Tye Green – Maltings Academy (secondary) and Powers Hall Academy (primary), Spinks Lane/Spa Road, Wickham – Margaretting Church of England Primary School, B1002, Margaretting A further review will be undertaken and agreed with the LHA prior to construction to consider restrictions on routes where any new schools have been built.	The Applicant has not included text in red, but has committed to review of routes where new schools have been built (text in blue).	The Applicant has agreed in REP4-298 that they agree to undertake site observations at the schools listed by ECC during school drop-off and pick-ups to confirm site conditions. They have also stated that they will continue to engage with ECC and review this matter. ECC would accept the site observations being undertaken prior to construction and the outcome discussed and included in the CTMP produced by the Contractor (if restrictions are agreed as necessary). On this basis our response to REP4-298 states the following: “We would require a commitment in the Outline CTMP to: • undertake the site observations and agree the outcomes with ECC prior to construction. • Any agreement following the site observations should be included in the Detailed CTMP produced by the Contractor.”	The Applicant has responded to the point raised by ECC in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]. As detailed within the response to TT 1.36 of 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299], the Applicant has discussed undertaking site observations at the schools listed by ECC during school drop-off and pick-up times to confirm site conditions. The Applicant will keep this matter under review and will continue to discuss it with ECC as part of the Statement of Common Ground.
After Section 3.3	National Grid and the Main Contractor(s) commit to joining and positively engaging with a Developer’s Forum on the basis of the following high level principles: – The Developer’s Forum would be a regular monthly online meeting beginning as soon as the DCO is granted. It would be chaired by ECC with key members of the other NSIP Teams invited as well as other Strategic Site Teams, alongside relevant members of the Local Highway Authority and Planning Authority – The Forum would be attended by National Grid as scheme promoter alongside their Main Contractor(s) constructing the scheme	The Applicant has not included text in red on the high level principles of the Developer’s Forum. They have stated the following at Section 6.6.2 (italics show the updated text): “<i>National Grid has committed to join and engage with a Developer’s Forum to be set up by Essex County Council, subject to agreeing suitable terms of reference</i>, to continue to formalise project coordination.” The Applicant set out how they will continue to liaise with ECC on the requirements for the Developer’s Forum with detail provided within the Final Construction Traffic Management Plan.	It is unclear if the Applicant means the final Outline CTMP or the final CTMP to be produced by the Contractor. As set out in ECC’s response to REP4-298 ECC requires the principles to be set out in the Outline CTMP as the approved document in the DCO. ECC would welcome further discussion on the principles to include in this document. ECC do not accept that the principles are discussed later with the Contractor if this is the approach that the Applicant is suggesting.	The Applicant is generally in agreement with the high-level principles of the Developer’s Forum put forward by ECC but wishes to discuss with ECC some points of detail. The Applicant will engage further with ECC and set out the high-level principles of the Developer’s Forum in the Outline CTMP at Deadline 7.

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
	– At critical times where programmes overlap National Grid and the Main Contractor(s) will attend more regular weekly or bi-weekly meetings for urgent discussions on collaboration – Funding will be provided for the time spent by ECC in organising and chairing the meetings over the life of the construction period of Norwich to Tilbury capped at £45,360 (based on monthly meetings) with any additional meetings charged at £105 per person – Commitment to provide flexibility to adapt to changing conditions as identified during the Developers Forum			
Paragraph 5.2.2	• 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. 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. In addition to condition surveys, a road safety review including structures should be undertaken prior to works commencing. This would include a drive through of all the PARs with the LHA to identify any issues that may need to be rectified prior to use and a review of the structures used to ensure they are still appropriate for the intensification of use. It is anticipated that the rural routes will be the focus of the safety review.	The Applicant has included a version of the text in blue (black text was original text) but not the text in red. However, they have included a version of the red text at 5.2.3 as follows: <i>“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.</i> <i>The Main Works Contractor(s) will use the Electronic Service Delivery for Abnormal Loads (ESDAL) process for planning AIL movements. This will include a review of the suitability of structures along AIL routes prior to AIL movements.”</i>	ECC welcome the inclusion of the text but note the requirement for a review of structures has been excluded for PARs. The Applicant states that a review of structures will be undertaken prior to AIL movements. However, as set out in the response to REP4-298 ECC require text to be included on review of structures on the PARs and diversion routes to ensure they are still appropriate for the intensification of use. It is anticipated the focus would be on the rural network.	The Applicant has committed to undertake structural inspections to confirm that the condition of the structures has not deteriorated since the initial assessment was undertaken. This will occur prior to AIL movements and be confirmed as part of the ESDAL process. Diversion routes have been selected to avoid known weak structures; the Main Works Contractor(s) will undertake a further review of the suitability of the diversion routes in line with typical road closure procedures. The Applicant has agreed to provide ECC with diversion route information to identify any other weak structures that may impact the suitability of diversion routes.

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
Paragraph 5.4.17	The construction and construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 6. The movements will be reviewed against the assumptions included in the Transport Assessment and ES to ensure no additional impact occurs beyond what has been assessed.	The Applicant has included a version of the red text proposed as follows: <i>“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 Transport Assessment (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4). Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents National Grid April 2026 May 2026 Norwich to Tilbury 35 and National Grid’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 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 CTMP.”</i>	ECC has responded to the Inspector’s Questions ExQ2 on this particular point which relates to whether a HGV cap should be included. The full response and any outcomes should be taken into account on this point. ECC has responded that a cap would be more definitive rather than the approach taken in the wording proposed by the Applicant. Notwithstanding whether a cap is introduced, a summary of the specific issues with the current wording is replicated below: - Total HGVs should be compared with TA/ES (not just deliveries) - Workforce vehicle numbers should be compared with the TA/ES - Information should be provided every three months at all times to the LHA and a discussion undertaken to agree whether there is a material impact and if so what corrective action should be taken - Potential corrective actions are required in the Outline CTMP (rather than the final version produced by the Contractor)	<u>Vehicle caps</u> ECC’s position on this matter is noted. The Applicant’s position on vehicle caps is set out in TT 2.11 of 8.9.2 Applicant’s Response to Second Written Questions [REP5-211]. <u>HGV comparison</u> Paragraph 5.4.18 of 7.3 Outline Construction Traffic Management Plan [Revision E] has been updated at Deadline 6 to remove reference to ‘deliveries’ and now refers to HGVs. <u>Monitoring worker travel</u> Paragraph 8.2.1 of the 7.3 Outline Construction Traffic Management Plan - Appendix B – Outline Construction Worker Travel Plan [REP5-151] provides an overview of the approach to the quarterly review of worker travel. The Travel Plan Coordinator (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. Additionally, car share ratios will be collated, and from this worker numbers will be inferred. This information will be sent to the relevant Local Highway Authority, at quarterly intervals, in the form of a monitoring review report. <u>Quarterly Report</u> The Applicant has updated paragraph 6.2.7 in 7.3 Outline Construction Traffic Management Plan [Revision E] submitted at Deadline 6 to capture the detail of the quarterly report. <u>Enforcement</u> The Main Works Contractor(s) will include potential sanctions for persistent enforcement breaches within the final Construction Traffic

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
				Management Plan. The 7.3 Outline Construction Traffic Management Plan [Revision E] includes the potential sanctions/enforcement procedure which could be considered by the Main Works Contractor(s). The enforcement procedure could include a warning letter being issued to the relevant contractor outlining what action would be taken in the event of any further non-compliance (in general terms). The contractor will then be required to produce an action plan to outline how the issue would be rectified and any additional mitigation measures proposed. Should further breaches occur, the contractor would be required to remove the offender from site and the contractor/supplier would receive a formal warning. Any continued breaches by individuals of the supplier/contractor may be dealt with by the formal dispute of the contract. The enforcement breaches will be captured within the Quarterly Reports issued to the Local Highway Authorities and National Highways.
Paragraph 5.4.11	The timescales for the implementation of these schemes is subject to change. The CTMP will need to be reviewed and amended in agreement with the relevant LHA should planned highway works or other external factors have a material effect on the agreed construction routeing strategy. In this way, the Contractor is providing a flexible approach to respond to changes in conditions.	The Applicant has not included the text proposed in red	ECC believe the red text provides more detail. External factors include emergency works for example that would not be covered by planned highway works. The last sentence provides some context and shows that there is flexibility in the approach when needed.	The Applicant considers that external factors, such as emergency works and planned highway works are captured within Section 5.4 Contingency Routes in 7.3 Outline Construction Traffic Management Plan [Revision E]. Section 5.4 of 7.3 Outline Construction Traffic Management Plan [Revision E] inherently commits the Main Works Contractor(s) to a flexible approach, where the traffic movements on the road network are compromised. The Applicant has omitted the proposed text as a result of the above position.
Table 5.7	Table 5.7 to be amended to include commitments to restrict the use of construction routes during school drop off/pick up as set out above.	The Applicant has not included the red wording.	This omission is acceptable on the basis that the above paragraph 2.3.5 is updated to reflect ECC's response.	The Applicant notes this comment and has provided a response to the suggestion to paragraph 2.3.5 above.

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
Section 5.4	- The Contractor will review and discuss ways of reducing freight by road with the Local Highway Authority. This will include (but not restricted to): - consolidation centres; - shared delivery logistics with other scheme promoters/developers; - wider considerations of the Multi Modal Strategy using rail and port facilities to replace long distance road freight; and - review of 'just in time' scenario (Scenario 2) set out in Appendix G of the Transport Assessment.	The Applicant has not included the red wording. They have referred to REP 3-074 detailing the design decisions to reduce HGV movements and developed a multi-modal strategy.	The Applicant has not included any wording to compel the Contractor to discuss ways of reducing freight by road. This is a national policy requirement and so is important to include in the CTMP to ensure the subject is discussed at a practical level.	The Applicant has updated 7.3 Outline Construction Traffic Management Plan [Revision E] to add a commitment for the Main Works Contractor(s) to explore and implement (where feasible, commercially viable and operationally reasonable) the reduction of freight by road.
Section 2.3	- Update Section 2.3 Working Hours to include the following: - Staff working hours will be <INSERT> - Staff will be unable to access the on site parking areas between the hours of 0800 and 0900hrs, or leave between the hours of 1645 and 1800hrs	The Applicant has not included the red wording. The Applicant has referred to REP3-074 to question DCO1.S10 however this does not include staff working hours.	ECC require these details to be included in the CTMP as they underpin the assumptions in the assessment in relation to staff working.	The Applicant provided a response to this point raised in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]. Core working hours are set out in Section 2.3 of 7.3 Outline Construction Traffic Management Plan [Revision E]. Paragraph 5.4.14 of this document states how construction worker LGV vehicles are to arrive and depart outside the normal highway network peak periods (i.e. 08:00–09:00 and 17:00–18:00 Monday to Friday). It is assumed that admin and office workers will arrive on site within these peak hours and therefore are accounted for in the assessment of the AM and PM peak hours presented within 7.11 Transport Assessment [APP-333] (assumptions set out in Section 6.7). The Applicant does not consider it necessary to prescribe restrictions on staff arriving at or leaving site, and considers that it would have adverse health and safety implications, for instance, in case of emergencies. The commitments within Section 8 of 7.3 Outline Construction Traffic Management Plan -Appendix B - Construction Worker Travel Plan [REP5-151] commits the Main Works

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
				Contractor(s) to report the shift arrival and departure times, which will be provided to Essex County Council.
Paragraph 5.4.10	- After paragraph 5.4.10 include the following: - To reduce the potential for impacts on the local highway network due to inappropriate HGV parking associated with lack of nearby resting facilities for drivers, baseline conditions will be collected prior to works commencing. The conditions will be monitored and reviewed using parking usage surveys for areas defined with the LHA through a scoping process. This will include laybys and industrial estates where clusters of HGV parking are identified, along with observations of other local roads where HGV drivers park and rest. This would be in areas on the local highway network along or within close proximity to the construction routes to determine any potential HGV parking issues. Mitigation would be considered in advance of construction works where necessary and agreed with the LHA. Depending on the results, the mitigation could either be implemented or a monitor and manage approach adopted with regular reviews at the key locations undertaken during the construction period.	The Applicant is considering the request and will continue to engage with ECC on this matter.	ECC welcomes further engagement to determine some appropriate wording for the Outline CTMP.	The Applicant will continue to engage with ECC on this matter, and will confirm it's position at Deadline 7.
Paragraph 5.5.5	- Include after paragraph 5.5.5 to ensure parking provision is in line with the assumptions in the assessment: - As part of the access design approvals details of car parking supply and demand for compounds will be provided along with cycle parking.	The Applicant has not included the red text on the basis that: - Sufficient parking is expected to be provided and the level of provision will be refined during detailed design phase - Parking at compounds will be limited and all spaces allocated - The TPC will monitor use of visitor parking bays	Essentially, ECC need to understand what solutions will be available if overspill parking were to occur. If there were issues then a quick response is required to deal with them. Monitoring does not offer a solution but simply provides the data showing the problem. ECC requires that the red text is included or alternative wording that sets out what solutions will be implemented if overspill parking occurs. ECC would welcome further discussion on this point to agree some wording for the CTMP.	This Applicant is and will continue to liaise with Essex County Council and will confirm its position at Deadline 7.
Paragraph 5.8.4	- Include after paragraph 5.8.4: - Access is required 24/7 to the Ardleigh Depot in Essex without hindrance for all vehicle types including a snow plough as worst case. It is noted that there are to be no delays to access/egress or on the surrounding local roads leading to the wider network as it will impact on road	The Applicant has included the following text which excludes the red text proposed by ECC: <i>"Before carrying out any works with a potential to affect access to the Essex County Council Depot in Ardleigh, National Grid/the Main Works Contractor(s) will develop and agree with Essex County</i>	ECC has responded to REP4-298 and require that the additional wording (red text) is included in some form. The relevant commentary on the response given to REP4-298 is replicated below: <i>"Essentially, we require wording that states the importance of minimising delays (ie it will impact on ECC's response to emergency incidents) and that the road closures and traffic management measures</i>	The Applicant notes that Essex County Council welcomes the addition of the paragraph in 7.3 Outline Construction Traffic Management Plan [Revision E] . The new paragraph states that 'National Grid/the Main Works Contractor(s) will develop and agree

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
	safety where ECC respond to emergency incidents on the local highway network.	<i>Council details of measures to ensure that access is maintained at all times to the depot; or where this is not reasonably practicable, that a suitable alternative access is provided and operational prior to any interruption of the existing access. National Grid/the Main Works Contractor(s) will provide reasonable advance notice of any proposed temporary road closures or traffic management measures that may affect access to the depot, including details of anticipated impacts on access and response times."</i>	<i>should be discussed and agreed with ECC to minimise impacts (rather than "notified")."</i>	<i>with Essex County Council details of measures to ensure that access is maintained at all times to the depot; or where this is not reasonably practicable, that a suitable alternative access is provided and operational prior to any interruption of the existing access' which is therefore considered to cover the request from Essex County Council regarding agreement.</i>
Table 6.1	- Table 6.1 at "Monitoring of vehicles and road network" to include: - Monitoring vehicle movements of HGVs and construction workers.	The Applicant has not included the red text in the table. They have stated that they have committed to the monitoring of vehicles in paragraph 6.2.6.	ECC would suggest that as the Table 6.1 is a summary of all the site checks relevant to the CTMP that this point is included for clarity.	Table 6.1 in 7.3 Outline Construction Traffic Management Plan [Revision E] has been updated to capture the monitoring of construction HGV vehicles, as committed within paragraph 6.2.6. The monitoring of LGV movements is captured within the monitoring process of staff arrival and departure times within 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [REP5-151] .
Paragraph 6.3.1	- The applicant should set out some examples of corrective actions that could be taken. ECC have included some in the proposed wording below to be provided after paragraph 6.3.1. Proposed - Where needed corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. These actions could include: - extending the programme of works to reduce the impact of traffic; - warnings given to drivers who do not adhere to the routing strategy or those waiting or parking at inappropriate locations in the vicinity of the site;and further disciplinary actions as necessary for repeated incidents - closure of compounds/on site parking to prevent staff arriving/departing during peak hours on the local highway network; or	The Applicant has not included the potential corrective actions in the Outline CTMP (as shown in red text). They have instead stated that further sanctions will be included in the final version of the CTMP.	It is assumed the final version mentioned is in relation to the Outline CTMP and not the version that the Contractor is to provide post DCO. If the latter, then ECC do not agree to this approach as ECC require some points that can be discussed with the Contractor.	Section 6.3 of 7.3 Outline Construction Traffic Management Plan [Revision E] has been updated to include additional detail for the non-compliance procedure and consultation with the Local Highway Authorities on the correct actions. National Grid will take all reasonable steps to avoid any breach of the CTMP through the implementation of the management measures. However, should any breaches occur, then enforcement procedures will be followed: Stage One: The Transport Co-ordinator will notify National Grid of any breaches of the CTMP arrangements as and when they occur, or the highway authority confirms a breach and requests the Transport Co-ordinator to

CTMP Ref	Original ECC Comments provided at REP3-078	Wording in CTMP Rev C [REP4-174]	ECC Comments [REP5-243]	Applicant's Comment
	– implementing additional shuttle buses to reduce worker traffic.			review the data and concerns. The highway authority and the Transport Co-ordinator would then agree the extent of the breach of controls, and agree action, which is likely to be a contractor warning at this stage • Stage Two: If a further material breach is identified then National Grid will issue a warning letter to the relevant contractor outlining what action would be taken in the event of any further non-compliance (in general terms). The contractor will then be required to produce an action plan to outline how the issue would be rectified and any additional mitigation measures proposed • Stage Three: Should further breaches still occur the contractor would be required to remove the offender from site and the contractor/ supplier would receive a formal warning. Any continued breaches by individuals of the supplier/ contractor may be dealt with by the formal dispute procedures of the contract
Section 6.4.1	• The list of non-compliance at Section 6.4.1 to include: – Construction traffic (both worker traffic and HGV movements) levels are beyond those assumed in the Transport Assessment and ES	The Applicant has not included the red text in the CTMP. They have noted that the requirement to monitor and manage vehicle movements against those in the TA/ES are captured as a commitment in paragraph 5.4.18.	As Section 6.4.1 is a summary of all the non-compliance then it should be included for clarity.	The Applicant has updated paragraph 6.4.1 in 7.3 Outline Construction Traffic Management Plan [Revision E] at Deadline 6 to reflect additional wording on construction traffic levels.

Appendix D1 Applicant's responses to the Deadline 5 submission from Pylons East Anglia (PEA) [REP5-264] and [REP5-265]

Appendix D1.

Applicant’s responses to the Deadline 5 submission from Pylons East Anglia (PEA) [REP5-264] and [REP5-265]

2.1.7 Table D.1 summarises the Applicant’s responses to the Deadline 5 submission from Pylons East Anglia (PEA) [REP5-264] and [REP5-265]. The Applicant has reviewed the submission and has identified that many of the points raised are similar to or extensions of matters previously raised by PEA and responded to by the Applicant at earlier deadlines. Therefore, the Applicant has sought to summarise the key points in this submission and respond in a proportionate and appropriate manner, with reference to its earlier responses and maintained position. Where there are new points of specific detail, the PEA submission may be quoted verbatim in some instances.

Table D.1 Applicant’s responses to Deadline 5 submission from [REP5-264] and [REP5-265]

Section	Matter	NG Response
Alternatives and Appendix G Good Design	PEA’s position is that alternatives to the Project have not been sufficiently evidenced. PEA state that: • The Applicant has over-scoped the HVDC underground solution both in terms of required capacity and in design terms • a DC alternative to the Project’s AC 400kV overhead line solution does not require 6GW capacity as stated by the Applicant. Eastern Green Link 3 and 4 is provided as an example where instead of a 400kV OHL solution, two 2GW HVDC solutions are to be deployed. This would require two sets of HVDC system and converter stations, not three as quoted by the Applicant, and would reduce land take and cable swathe significantly compared to HVAC. • HVDC installed by cable plough would result in far reduced land take compared to the Project, with a swathe of 40m instead of 80m. This would also be quicker, as supported by Welsh Government evidence as previously submitted by PEA. Appendix G of the PEA submission provides further detailed appraisal of the proposed differences between the construction swathes of the Project and a HVDC alternative. • the haul road required for the Project could be avoided entirely with a HVDC alternative through use of cable ploughing. This would also reduce carbon emissions associated with construction of the haul roads. • HVAC is more sensitive to changes found during construction and requires wider swathes than a HVDC alternative • Deliverability risks of HVDC as stated by the Applicant are not evident with sufficient planning and as demonstrated by other HVDC projects delivered in Europe and the UK such as Eastern Green Link projects. • The Applicant discounted HVDC options without sufficiently developing a proposal for such a design, and did not consult on offshore options. • The Applicant has not sufficiently considered agricultural land classification and the National Landscape in progressing the overhead line option.	The Applicant notes that similar points have been raised by PEA throughout Examination, to which the Applicant has responded in detail, in addition to the discussion held at Issue Specific Hearing 1 (ISH1) and summarised in 8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]. The Applicant responds to the key points in turn below: 6. Capacity and HVDC alternatives Paragraph 15.4.14, page 124 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] stated: <i>‘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).’</i> As set out in paragraph 3.3.10 (page 35) of 8.8.2 Applicant’s Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]: <i>‘The current post-fault capacities of:</i> • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of - 7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of - 9,928 MW. This demonstrates that the physical capacity across the boundaries is required to be greater than 6,000 MW (6 GW), therefore the Applicant as stated above in the paragraph 15.4.14 could no longer in this case consider a 4000 MW (4 GW) HVDC solution as it does not provide the physical capacity to meet the need. The (Eastern Green Link) EGL3 and EGL4 HVDC projects only required HVDC capacity of 4000 MW (4 GW) in that case, however, if an AC solution were to replace that option over a distance greater than 600 km, the capability requirement would still be 4000 MW (4 GW). However, due to the way AC circuits work, in that case, a larger capacity AC solution would be required to better share across the rest of the AC network. Therefore, the Applicant always compares 2 GW HVDC links (as in the case with Sea Link which is a single 2GW HVDC link) and 4 GW HVDC links (as in the case for EGL3 and EGL4 which is a pair of 2GW HVDC links), with a minimum of a 6,380 MW AC alternative. In the case of the EGL3 and EGL4, the alternative set out on page F3 of Appendix F of National Grid’s ‘Eastern Green Link 3 (EGL3) and Eastern Green Link 4 (EGL4) - Strategic Options Report (SOR) May 2025 was over 768 km in length, which is over four times the length of the Applicant’s proposal. These distance impacts are reflected in the EGL3 and EGL4 evaluation, using the same consistent approach set out in Appendix D: Economic Appraisal of

Section	Matter	NG Response
		7.19 2023 - Strategic Options Backcheck and Review [APP-357], which is mirrored in the EGL3 and EGL4 documentation. This is regardless of the capacity required as AC circuits form part of an overall AC network and will naturally share the power flow across the new circuit. This requires it to be considered as a suitable size to allow those flows to occur. However, in the case where more than 6 GW physical capacity is required across a boundary, then the physical capacity of both HVDC and AC needs to be 6 GW or greater to meet the need. For this Project, this need for 6,000 MW (6 GW) of capacity is set out in Section 3: Need Case page 20-38 7.17 Strategic Options Backcheck and Review [APP-355]. 7. Cable swathes The Applicant has previously provided clarification to PEA on the differences of HVDC and HVAC cable swathes. This is replicated below for convenience, from pages 29-30 of 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]: <i>'7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] states that 'HVDC onshore cables have advantages over AC cables having significantly less land take, and therefore somewhat lower environmental impact.' (paragraph 1.3.11). However, this comment only applies where HVDC onshore cables are used over a long distance, which is their typical use. The benefit in terms of land take of HVDC onshore cables as opposed to high voltage alternating current (HVAC) onshore cables is the potential reduction in construction swathe due to the lower number of cables required. For a comparable 6 GW HVDC connection an illustrative construction swathe of 85 m would be expected for standard open cut installation; details are provided in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] Annex C Figure C1. In comparison 2.6.1 Design and Layout Plans - Subs and Cables [REP1-003] National Grid Drawing Reference AENC-MMAC-ENG-DWG-0085-01, shows an illustrative construction swathe of 120 m. The reduction in temporary land take of the construction swathe for an HVDC installation is therefore 3.5 ha per km less than the equivalent HVAC installation.'</i> 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] (pages 42 – 43) confirms: <i>'considering a 6 GW HVDC cross section for installation efficiencies, the haul road would be located in between the three trenches, with two trenches on one side and the remaining trench on the other side. This would create an overall cable swathe of around 41 m in an 85 m construction swathe (refer to the figure in Annex C) compared with the indicative 50 m cable swathe for alternating current (AC) installation within a 120 m construction swathe.'</i> 8. Haul roads Haul roads are required to deliver the cable drums to location for installation for both cut and cover, and cable ploughing solutions. As stated in the Applicant's response to Examining Authority question LV 2.2, as provided in 8.9.2 Applicant's Response to Second Written Questions [REP5-211], only circa 1 km of 400 kV AC cable and 525 kV HVDC cable can be delivered on a road legal UK vehicle, with weight and height restrictions. However constraints along the alignment of the route can further impact the available length of each cable section. The cable system design and preferred bonding strategy can also impact the section lengths. Taking a reasonably worst case an average cable section length of 800 m can be assumed; although some sections may be shorter they would be outweighed by longer sections elsewhere along the route. Therefore, regardless of cable installation method, a haul road would always be required, to get the cables to the installation location. Also, a cable joint bay will be required approximately every 1 km, for both AC and HVDC cables to joint the circa 1 km sections of individual cables together. 9. Deliverability of HVDC

Section	Matter	NG Response
		Page 21 of 8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] states the following: <i>‘The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available.’</i> The Applicant’s position has not changed with respect to this response; the EGL projects are separate, requiring less capacity and have been in development for many years. The EGL projects along with other European projects, have secured capacity in the market which is the reason that market constraints are prevalent for any additional projects seeking to deliver in similar timescales as those which have already secured capacity. 10. Consultation on offshore alternatives National Grid considered alternatives in 7.19 2023-Strategic Options Backcheck and Review [APP-357], with all onshore alternatives of AC overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant notes PEA has raised the matter of consultation many times previously, including prior to DCO submission through legal opinions provided by Lord Charles Banner KC. The Applicant refers to its response to those opinions as submitted with the DCO application (then superseded at Deadline 1) in 5.1 Errata Consultation Report - Appendix N - Legal Opinions [REP1-007]; paragraphs 108 and 109 of that document states (bold / underlining as in the document): <i>‘Nor is there even, in fact, a requirement in the 2008 Act or the Guidance to explain strategic choices in relation to alternatives as part of the pre application consultation process. There is, as set out above, a suggestion that applicants might benefit from such a “brief explanation” <u>in the application documents</u> – specifically and potentially in the Planning Statement. There is also a requirement to identify alternatives considered in the Environmental Statement, again required to be provided alongside the application (but not necessarily before).</i> <i>Notwithstanding these provisions and significantly in advance of the application stage, at two non-statutory stages and again in the statutory pre- application stage, NG has explained its strategic decision not to prefer (at this stage) alternatives such as offshore cabling or significantly wider undergrounding and has actively and transparently engaged with the public on such matters. It has consistently, by its words and actions, stated that these strategic decisions are the subject of constant backcheck and review.’</i> 11. Consideration of agricultural land classification and National Landscapes in alternatives In relation to agricultural land classification, the Applicant has confirmed to PEA previously, for example on page 30-31 of 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] that <i>‘during route optioneering the impacts on agricultural land, including on agricultural land-take (such as sterilisation) 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]. The Applicant has sought to minimise impacts on Best and Most Versatile land but notes that this is one of a range of considerations within the balanced decision-making process. 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</i>

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		<i>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.'</i> The Applicant has also made its position clear on routeing and design in relation to National Landscapes in response to PEA and other Interested Party comments throughout Examination. As set out in paragraph 2.5.17 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], for example: <i>'Paragraph 2.9.21 of EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is reverseable for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. 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. Details are set out in 5.15 Design Development Report [APP-122], 5.6 Planning Statement [APP-085] and 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139].'</i>
Alternatives and Appendix G Good Design	PEA state that the Applicant has not sufficiently attempted to coordinate offshore infrastructure, despite NESO evidence in 2020 that it would reduce cost and land take by up to 213 hectares. PEA have previously provided evidence of a concept alternative solution for this offshore coordination for North Falls and Five Estuaries Windfarms in its 'OCSS Review' and Appendix D at Deadline 3 [REP3-132] .	The very latest offshore impact assessments submitted by the NESO 'South Cluster Impact assessment outcome summary' and the 'Ossian and North Cluster 2 impact assessment outcome summary', are both available on the NESO offshore Coordination webpage. These reports were produced in 2024 and 2025 respectively and both designs have reduced integration from the original Holistic Network Design (HND) baseline. The Southern Cluster Report states on Page 1 and 2 Outcomes: <i>'There are a number of changes that have occurred since the HND was published in 2022 which have led to this outcome. Increases in the cost of Offshore equipment above the rates of general price increases, challenges in the supply chain for transmission assets, and the identification of opportunities to realise additional electrical and physical capacity are key factors. A significant driver of this assessment and outcome is the updated delivery timescales for different technology types provided to the ESO by the Southern Cluster parties, meaning the original HND design would be delayed by a number of years.'</i> The Northern Cluster Report states on Page 3 Outcomes: <i>'The conclusion of our analysis resulted in Bellrock connecting directly into Hurlie and Morven connecting directly into Hawthorn Pit, emerging as the preferred option. Coordinated designs, particularly when simplified into a more modular solution do offer balance across the four design objectives. However, due to the limited market uptake of bespoke solutions and technology maturity level, continuing with the recommended design could cause delay to the delivery of critical onshore reinforcements and a potential risk of delay to clean power connections.'</i> In both cases the NESO has agreed that reduced integration is necessary due to cost increases and technology availability. These assessments are more developed and assessed than the original Holistic Network Design Baseline produced in 2020 and the most up-to-date information available on the NESO website. The offshore coordination alternatives referenced would not only increase the transmission costs (see Section 5 'Options assessment process', pages 47-49 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] which sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs). It would also change the offshore generators' connections from the proposed AC to HVDC. This would have the impact of requiring offshore generators to have both AC and HVDC platforms, with an offshore converter station. This would significantly increase the cost of their connections as the HVDC converter stations, which would be required by this solution, would add cost to their existing solution. This would also change their delivery capability as it would require a complete design change for the

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		generator. The Applicant is not allowed to own offshore transmission assets, so the design of offshore networks is for the generator and/or a licenced Offshore Transmission Owner (OFTO). Where it is possible to use HVAC for connections less than 100 km in length, offshore generators will choose this type of connection as it is less costly to the consumer and reduces technical complexity. Co-ordination of generation and transmission requires balancing technical viability, demand, cost to the consumer, and complexity. As demonstrated by the latest NESO impact assessments the current balance in the identified projects has been to reduce integration to manage risks. Also, the Applicant’s proposal incorporates all the generators seeking to connect in a co-ordinated and economical system of electricity transmission. Overarching National Policy Statement for Energy (EN-1) (‘NPS’) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Therefore, the timing and need for the Project (set out in Section 3 ‘Need Case’ pages 20-38 of 7.17 Strategic Options Backcheck and Review [APP-355]) remains urgent within the requirements of the NPS EN-1 and EN-5 framework, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the National Policy Statements and the Applicant’s obligations.
Alternatives and Appendix G Good Design	PEA consider that reconductoring and upgrading the existing grid has not been sufficiently considered, with key points that: - the Applicant has not evidenced an appraisal of the cost/practicality of upgrading existing 400kV grid using TS Conductor-style conductors, which would completely protect farmland. - There is disagreement with the Applicant on whether Green Gen Cymru are using ‘Cardiff’ conductors to transmit 400kV on 27m high pylons. - Conductors being used on the Pelham-Rayleigh upgrade (Triple Araucaria) do not bring any significant capacity increase on those currently used (Quad Zebra), which is a missed opportunity to increase capacity in the region without the need for new build infrastructure. - Reconductoring is being used on other schemes in the UK as a preference over new build. - the Applicant is mischaracterising TS Conductor technology in its responses to PEA. PEA has provided information from TS Conductor regarding its use in new build vs reconductoring projects; longevity of the technology, and technical specifications.	Part 1 - High Temperature Low Sag (HTLS) and Traditional Conductor appraisal of achieving maximum IET 5000A circuit ratings (addressing bullets 1,3, 4 and 5) The Applicant has for 20 years used high temperature low sag (HTLS) conductors on routes where older pylons cannot achieve the highest ratings. HTLS conductors, of which TS conductor is just one type from one manufacturer. The Applicant has been using MATTHEW GZTACSR conductor for 20 years, for example, to maximise capacity on old routes. These HTLS conductors have been deployed for many years on legacy parts of the network. They operate at higher temperatures (typically 150–250°C), allowing greater losses without breaching sag limits. This reflects the constraints of older pylons, which must use smaller conductor bundles to remain within structural weight limits. The only way heat is generated in the conductor is through power losses, so HTLS conductors are designed not to sag when they heat up from higher losses, and therefore smaller conductor and bundle sizes can be used to reduce weight on less structurally strong towers. Where newer, structurally stronger pylons are available, the highest network ratings can be achieved more efficiently using standard conductors operating below 90°C. These lower-cost conductors are installed in bundles to minimise electrical losses while maximising capacity, delivering better value to consumers. Newer structures, including T-pylons, therefore achieve maximum ratings with standard conductors and lower losses. In East Anglia, both the existing and proposed network can reach the highest required ratings using these lower-loss, standard conductor solutions. Paragraphs 3.2.9 to 3.2.12, page 25 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] state: <i>‘There are limitations as to what a circuit can carry, defined by the International Electrotechnical Commission (IEC), which sets ratings for 420 kilovolt transmission, of 5,000 amperes, being the highest available equipment. This equates to:</i> <i>A capacity on a single circuit of 3,465 megavolt-ampere (MVA)</i> <i>A double circuit of 6,930 MVA</i> <i>Where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA.</i> <i>The current post-fault capacities of:</i> <i>EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW</i> <i>EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.</i> <i>These circuits are operating within about 300 MW of the maximum capability, and therefore, new infrastructure is required to meet the deficits.</i>

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		Given the system indicated above is operating within 300 MW of maximum capability, a range of suggested network enhancement measures that have been considered and rejected, is set out in 8.5.3 Applicant’s Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]: • <i>LineVision Dynamic Line Rating (DLR) — enables real-time ambient conditions circuit ratings</i> • <i>TS Conductor — High Temperature Low Sag (HTLS) conductor</i> • <i>Super Conductors — low maturity transmission at level Liquid Nitrogen cooled conductors</i> • <i>Power Flow Control and Transmission Switching — moves power around the network to maximise utilisation</i> • <i>EC5 Constraint Management Intertrip — system to generator intertrips, only used during planned outages</i> • <i>Interconnector Operation — interconnectors between the UK and Europe are commercially independent systems. As the existing system is meeting the IEC 5000 Ampere (A), existing enhancement is not possible and new circuit infrastructure required.’</i> The Applicant made it clear the existing network cannot be enhanced further as it is already maximised to the 5000 A rating. Therefore, reconductoring in East Anglia has been maximised to 5000 A rating with traditional conductors. Where reconductoring is being done on the Applicant’s system it is to improve circuits with lower ratings allowing them to achieve upto the maximum 5000A rating limitation. Where circuits are operating below this limit, reconductoring is always considered, including using HTLS conductors on pylons that are structurally capable of meeting the 5000 A rating with standard conductors in bundle arrangements than can be supported by the tower. All 400kV capable lattice towers on the applicant’s system, with a traditional three cross arm configuration are greater than 40m tall, this is required for 400kV clearances. The L7C tower referred to as 27m high is a 132kV lattice three cross arm configuration and does not have the clearances between conductors to operate at 400kV as described in part 2 below. Triple Araucaria conductor is a 700 mm² conductor carried in a three-wire formation, operating at 75°C, which can meet the 5000 A year-round rating. Where the Applicant uses HTLS conductors in double formation with conductor sizes below 700 mm², the resistivity of the conductor (which is proportional to the total cross-sectional area of all the conductor bundle) increases. This means that 5000 A cannot be achieved without conductor operating temperatures closer to 200°C. This gives rise to higher system losses, which impact consumers. Therefore, using HTLS has to be a balance of system need, transmission infrastructure and cost to consumer. Where the system can accommodate the maximum 5000 A rating with traditional conductors, they are chosen to minimise electrical losses while maximising capacity, delivering better value to consumers. Part 1 - Green Gen Cymru and L7C 132kV tower specification (addressing bullet 2) As previously set out on pages 13 and 14 of 8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202]: <i>‘The full statement Green Gen Cymru make on their website is as follows: “It will be deployed on L7c pylons — structures that stand approximately 27 metres tall and 5 metres wide. These are around half the size of a typical 400kV transmission tower”.’</i> The Green Gen Cymru website does not state the circuit will be operating at 400 kV, all the statement above does is compare an L7c pylon to the size of a 400 kV pylon, being half the size. This is factually correct; as indicated before, an L7c pylon only has clearances to operate at 132 kV. As stated in part 1 above the smallest three cross arm lattice configuration towers that operate on the applicants system, of a similar design to L7 towers are over 40m tall to achieve

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		minimum 400kV clearances. The Energy Network Association (ENA) is a body to which all licensed Transmission, Distribution and Generation Companies can join including Independent Distribution Network Operators (IDNOs). The ENA published the specification for the L7c pylon in ‘Technical Specification 43-9, Issue 3, 2013 – 132 kV steel pylon transmission lines: Specification L7(c)’ which clearly states it is a 132 kV pylon. This aligns with the fact Green Gen Cymru is referenced as an IDNO in the ‘Definitions’ section of their website under ‘Get Connected’. IDNOs are licensed to operate at 132 kV and below; only transmission owner (TO) licence holders can operate assets above 132 kV.
Risk to Farmers and Appendix A Letter from Scottish Government to SSEN re Kintore to Tealing 400KV OHL	PEA draw attention to a letter sent by the Scottish Planning and Environmental Appeals Division (DPEA) to SSEN on 14 May 2026 regarding the for inquiry for the Kintore to Tealing 400KV OHL transmission line being sought under Section 37 of the Electricity Act 1989. This requires the applicant in that case to <i>“provide an assessment of the entirety of the proposed overhead line, to identify if the proposed clearance heights of each span of the line would individually or cumulatively result in significant effects on human health and/or land use’. This includes:</i> <i>• The precise baseline position relating to statutory clearances and the factors to be taken into account in establishing necessary clearances on each OHL span, including the ESQCR, ENA TS 43-8, ENA Look Out, Look Up - bespoke guidance for agricultural sector and any other relevant legislation or guidance.</i> <i>• A detailed assessment of the foreseeable risk of danger to agricultural workers, having regard to the proposed clearance height of each conductor span (together with predicted variance in sag), the use of the over-sailed and immediately surrounding land, use of modern farm machinery including vehicles and necessary working clearances, use of rain guns / spray systems and any agricultural equipment or operations, which present a foreseeable risk of danger due to the proximity of the OHL.</i> <i>• In each location (i.e. for each conductor span) where a foreseeable risk of danger exists, the precise mitigation measures proposed in each location should be identified to eliminate or otherwise minimise significant effects.</i> <i>• Where a residual foreseeable risk of danger is identified across a span, or where mitigation would involve changes to the use of land beneath and/or near to the overhead line span, a detailed qualitative and quantitative assessment of the agricultural land implications of the proposed development is required (for example, whether land, including prime agricultural land, would become sterilised or less productive, or where agricultural land use practices would need to be altered in order to be undertaken safely). Any consequential socio-economic effects should also be identified.</i> <i>• Identification of the residual significant effects (if any) upon human health by virtue of electrocution risk to agricultural workers, and by virtue of any required changes to agricultural land use.”</i>	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 (DAS) [Revision C]. 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 because of landform variations and because the minimum is typically towards the middle of the span and is higher closer to the pylons either side). This complies with the statutory clearances set in The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR 2002) and by the ENA Technical Specification 43-8 and allows agricultural vehicles such as combine harvesters to pass underneath. Illustrative elevation profiles of the overhead line are available in 2.7 Elevation Drawings - Overhead Line Profiles – Parts 1 and 2 [APP-044 and APP-045]. The maximum vertical limits of deviation (LoD) are secured by Article 5 of 3.1 Draft Development Consent Order [Revision F]. 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 the following guidance: • 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’ • ENA Safety information for safe usage of mechanical plant in the vicinity of overhead power lines, ‘Look out, look up!’ • National Grid’s Third-party guidance for working near National Grid Electricity Transmission (NGET) equipment, TGN 287 • Statutory clearances guidance in ENA’s TS 43-08 Overhead line clearances 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. • Third-party guidance for working near National Grid Electricity Transmission (NGET) equipment, TGN 287, discusses responsibilities and risk near electrified overhead lines, particularly in Part 2, pages 04 and 05. Land use and access is discussed in Part 3 on page 07. The Applicant acknowledges PEA’s bullet point four. 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]). Should mitigation measures which would involve agricultural disturbance be put in place to follow HSE procedures, all works would be undertaken in accordance with good practice as set out in 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [Revision C].

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Comments on ExA's 2nd Written Questions	PEA have provided commentary on various questions posed by the ExA through the second written questions (ExQ2).	The Applicant has reviewed these comments and understands that they are not responses to the questions as they were not posed to PEA by the ExA. Rather, they are comments on the nature of the questions or the topic that they cover. The Applicant acknowledges these comments but does not consider it necessary to respond in detail, recognising that these comments are provided by PEA without sight of the ExQ2 responses submitted at Deadline 5. The Applicant may therefore comment as appropriate on any further submissions made by PEA following their review of the ExQ2 responses. The Applicant has, however, extracted two specific comments where it can provide some clarification that would not otherwise be provided through its ExQ2 response.
Comments on ExA's 2nd Written Questions and Appendix B Emails about construction work during nesting season, Bramford to Twinstead	DCO 2.G2 Use of 'where practicable' PEA have raised concern that the use of 'where practicable' wording has resulted in the felling of hedgerows and trees within bird nesting season under the Bramford to Twinstead DCO. PEA is concerned that National Grid was able to carry out this work because it was not practicable to do so outside of the nesting season, and has further concern that the work was not carried out correctly in accordance with the DCO requirements, in undertaking bird surveys prior to the works.	The Applicant notes the comments regarding a separate National Grid project, the Bramford to Twinstead DCO. The works being undertaken for that consented project are not within the remit of this Examination. However, the Applicant can provide clarification. All vegetation activities associated with the Bramford to Twinstead project are carried out in line with that project's DCO and licences issued by the relevant authorities. For the works being referred to, Natural England granted a licence permitting vegetation clearance during specified windows, including May and from mid-September, to manage impacts on dormouse habitat. A qualified ecologist was on site throughout, and nesting bird checks were carried out before and during works. Any vegetation removed as part of the project will be replanted in line with plans agreed with the Local Planning Authorities. The Applicant reiterates that protecting wildlife and complying with environmental legislation is fundamental to how we deliver our projects. The Applicant also notes that Pylons East Anglia have not provided substantiated evidence to this examination to back up their concerns.
Comments on ExA's 2nd Written Questions	LV 2.19 The applicant 3D Visualisation Tool We believe that the Inspectors would benefit from seeing the 3D tool in its entirety, or at the very least, images from the tool for the Colne Valley. It was a great frustration during the Statutory Consultation that one could only see these images for a few minutes IF one was able to attend the drop-in events. Yet the panel will be aware of our submission about consultation deficiencies which 9 listed the issues with timings and locations of drop-in events.	The Applicant acknowledges that a 3D visualisation tool was provided at the 2024 public consultation events, despite there being no requirement to provide such a tool to assist consultation. Multiple machines and screens were made available at events, and there is no substantiated evidence of attendees not being able to access information. The 3D visualisation tool provided a visualisation of the proposed pylon locations modelled on the 2024 statutory consultation design and was an illustrative tool designed to be viewed in conjunction with other published consultation materials. For the 2025 targeted consultation public events, the tool was updated in three locations to reflect proposed changes (the two locations where the Applicant consulted on the use of low height pylons and the proposed Tilbury North substation). For the periods when the 3D visualisation tool reflected the latest proposals, the Applicant provided screenshots from the 3D visualisation tool by email upon request. The design shown on the model is therefore not the same as the design presented in the application. The Applicant provided some screenshots of the 3D visualisation tool in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211] in response to question LV 2.19. This included seven screenshots taken from viewpoints at the top of the Colne Valley near Fordham, from Coney Byes Farm, Highfields Farm, and Kings Hall. These screenshots can be found in Appendix H LV 2.19 [REP5-211].
Our comments on Document: 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1	PEA have provided commentary on the Applicant's comments on the PEA responses to ExQ1 [REP4-300] , relating to question BIO 1.12, LUS 1.4 and SET 1.2.	The Applicant acknowledges the comments provided by PEA and has reviewed their content. The Applicant does not have any further submissions to make regarding ExQ1 at this time and defers to its previous submissions on these questions; both its own responses 8.9.1 Applicant's Responses to First Written Questions [REP3-074] and its comments on PEA's response to ExQ1 - 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300]. Should the ExA consider that any further clarification is required on aspects of ExQ1, the Applicant will seek to provide this.
Comments on Document 8.5.8 Applicant's Response	PEA set out the following points of disagreement on the Applicant's Comments on Document 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points:	Response to first bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. As a point of clarification, the Applicant has

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to Issue Specific Hearing 2 Action Points	- The route has a kink near Ford Street and another near Aldham Hall; it is not straight or direct as stated by the Applicant - The pylons are exceptionally close to both Ford Street (c250m and c400m for the closest pylons) and Adham (two pylons are c100m from houses and c300m from the church, which is 30m high). Pylons run parallel behind the Ford Street Conservation area on elevated ground, with the effect of encircling Ford Street. - the applicant significantly harming the landscape by adding pylons, it is also harming the landscape by removing very large numbers of trees. This, in addition, reduces the screening/mitigation and makes the pylons even more obtrusive and visible in the Colne Valley particularly in the vicinity of Ford Street. - Pylons are being placed on hilltops exacerbating harm, particularly to the Ford Street Conservation area which located on low ground and is surrounded by hills. Pylon TB048 is on elevated ground in close proximity to the Ford Street Conservation Area - The pylons do not follow the slopes. They cut across a beautiful valley of a tributary of the Colne, with very far reaching views south-eastwards towards Colchester – Jumbo, the famous and iconic water tower, can be seen. The views down the tributary valley stretch across the Colne as it flows eastwards and will be broken by TB041, 042 and 043. Pylons 047 and 048 don't "follow slopes" – they would be placed near the top of slopes in an area with significant heritage assets and unspoilt countryside ruining the views towards Colcjester in one direction and Aldham, with its listed church, in the other - As the Applicant states, there is an elevated plateau with longer views across the surrounding area. Pylons TB041, 042 and 043 will obstruct this view. Pylons 44 to 48 are also on elevated ground compared with the surrounding areas which will cut across views that are currently unspoiled - The alignment does not avoid the Roman Villa excavation site. As you will see from submission EN020027-002602, Pylon TB047 will be directly on top of possible archaeology that extends from the dig site, and towering over the dig site itself, destroying its setting and views from the site towards Colchester, the Roman capital, in the distance. Not only that, but as you will see from the submission, the pylon route as it passes by Fordham impacts numerous archaeological finds and sites. The Applicant has been told this repeatedly. In response to recent submissions the Applicant states that pylon TB047 has been moved north eastwards, yet the online map shows it has not moved. Pylons TB047 and TB048 are located on elevated positions - Much of the existing woodland in the vicinity will be removed for the project, thus it is questionable how much 'filtering' of the views there will be. The setting of the Ford Street Conservation area and the historic Essex Way will be changed irrevocably. As shown by the topography markings on the land registry plan, pylons do not enter the lower valley area. The lowest of the pylons (TB050) will still start 15mts above the Ford Street Conservation area. The established trees will not filter the cables given the relative disparity in size. - The Applicant has not considered flooding adjacent to Ford Street where the works compound is proposed. Site of proposed TB050 is flooded every year - The removal of trees at the point where the alignment crosses the A1124 will have the effect of exacerbating the impact of the project by affording views to the north east across the Colne Valley and up the Gallows Green ridge to the south west. Pylons TB052 and TB053 are directly on the top of the ridge and will be highly visible and unscreened	not stated the route is straight, rather that the aim has been to follow Holford Rules 2 and 3 as explained in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. - Response to second bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. In addition to this, the Applicant has also considered similar points raised previously in [REP1-305] within 8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings. An assessment of the residential visual amenity impact on those properties in Aldham that lie circa 200 m from the Project is set out in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126], [REP5-128], [REP5-130], [REP5-132] and [REP5-134]. The Applicant has also addressed this matter in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], where the assessments of both Fordstreet and Aldham are set out, including consideration of distances to the proposed pylons. - Response to third bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. The Applicant has responded to concerns relating to landscape and visual effects, and also vegetation loss in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. Concerns relating to landscape and visual effects are responded to on page 248 [REP2-023]. Concerns relating to vegetation loss on page 201 [REP2-023] explain how the amount of lost vegetation is anticipated to reduce following detailed design (post-consent). - Response to fourth bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. As a point of clarification, the ground level of pylon TB048 is just below 30 m AOD on the valley slopes, whereas the highest point in Fordham is around 56 m AOD. The settlement of Fordstreet lies at a lower elevation in the valley bottom at around 18 m AOD. TB048 is approximately 800 m north east of Fordstreet. The Applicant has also addressed this matter in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], where the assessments of both Fordstreet and Aldham are set out, including consideration of distances to the proposed pylons. - Response to fifth bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. As a point of clarification, the ground level of pylons, TB047 is around 25 m AOD and TB048 is just below 30 m AOD on the valley slopes, whereas the highest point in Fordham is around 56 m AOD and Fordstreet lies at a lower elevation in the valley bottom at around 18 m AOD. The Applicant has responded to concerns relating to landscape and visual effects on page 248 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. - Response to sixth bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. Pylons will be visible from plateau landform around Fordham Place but will not obstruct views as these lattice structures are designed to be visually permeable. The ground level of pylon TB044 is around 40 m AOD whereas the highest point in Fordham is around 56 m AOD. South west of TB044 the route follows the valley slopes, towards TB048 which lies just below 30 m AOD. The Applicant has

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		responded to concerns relating to landscape and visual effects on page 248 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. • Response to seventh bullet: The Applicant acknowledges the comments regarding the potential impact of the Project on archaeological remains and the setting of the Romano-British settlement and associated features in the vicinity of TB047. These matters have been previously considered and addressed in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], and in responses to ExQ2 HE2.11 and HE2.12 within 8.9.2 Applicant's Responses to Second Written Questions [REP5-211]. As set out in those submissions, TB047 was moved north east following consultation and archaeological fieldwork to avoid direct physical impact on known archaeological remains. The revised location has been subject to geophysical survey, with further evaluation through trial trenching to confirm the presence or absence of archaeological remains and inform any required mitigation. The assessment of effects on the setting of the asset, including views towards Colchester and the wider landscape context, has been presented in the Environmental Statement and supporting visualisations. The Applicant does not have any further information to add at this stage and maintains the position set out in the above submissions. • Response to eighth bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. The Applicant has sought to minimise the need for vegetation removal and will replace vegetation except in circumstances where there are restrictions to planting trees under overhead lines and over underground cables. Although some woodland loss will occur, much of the woodland and layers of vegetation will remain in the Colne Valley. Woodland cover will increase in the future as the trees in the Woodland Trust Land mature. The ground level of the lowest pylon, TB050 is around 20 m AOD. The settlement of Fordstreet lies at slightly lower elevation in the valley bottom at around 18 m AOD. The Applicant has responded to concerns raised in relation to tree loss in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. The Applicant wishes to reiterate that Volume 6 - Environmental Statement is based on an assumed worst-case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236] and [REP1-065]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [Revision F]. Measures to avoid/mitigate impacts to all trees are also a Project commitment LV05 in 7.2 Outline Code of Construction Practice [Revision F]. Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] outlines the commitment to reinstate hedgerow field boundaries. The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan [Revision F]. This is secured by Requirement 4 within 3.1 Draft Development Consent Order [Revision F]. Details of on-site tree planting will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [Revision F]. The Project would prioritise the replanting for individual trees within the Order Limits, however, off-site provision may be required. Any off-site tree planting required because of this commitment would be secured via a legal agreement. All other tree habitat including

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		scrub and woodland (area habitats) are assessed and mitigated through the BNG metric and captured in 7.1 Biodiversity Net Gain Report [APP-299]. The assessment of Fordstreet Conservation Area has been undertaken and is set out in the Environmental Statement, including 6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C] and supporting appendices, as well as in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300]. The Applicant also notes that Historic England’s Written Representation [REP1-191] is in agreement with the Applicant’s assessment of Fordstreet Conservation Area. The assessment has taken into account topography, visibility and the wider landscape context, including how the proposed infrastructure would be experienced within the setting of the conservation area. The consideration of vegetation and screening forms one component of that assessment and does not represent the sole basis for the conclusions reached. The wider landscape and visual effects, including within the Colne Valley and surrounding Landscape Character Areas, have also been assessed within 6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]. • Response to ninth bullet: The Applicant has assessed the risks of flooding to the Project and arising within the Project, within 7.9 Flood Risk Assessment [APP-331]. TB050 is in proximity to the River Colne, although is not mapped as within its floodplain extent (being on land within Flood Zone 1). Environment Agency flood model outputs confirm that the location is not at risk of routine flooding from the Colne. It is therefore likely that the observed conditions link to poor drainage and waterlogged soil conditions. Measures secured by 3.1 Draft Development Consent Order [Revision F] and detailed in 7.2 Outline Code of Construction Practice [Revision F] would manage such conditions in order to enable constructability and mitigation any off-site impacts. • Response to tenth bullet: The Applicant stands by the statement made in 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points [REP4-303]. Please refer to the Applicant’s response to bullet point eight above, regarding vegetation removal and replacement. The Applicant has responded to concerns relating to landscape and visual effects on page 248 of 8.4.1 Applicant’s Comments on Relevant Representations [REP2-023].
Comments on Document 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points	Western route The Colne Valley western route is no more appropriate than the proposed route. It represents a very rough sketch drawing by a resident, with no research or evidence behind it. It is longer and therefore more expensive and increasing the harms, and brings a myriad of environmental, heritage and landscape problems of its own (for example, proximity to the Chappel Viaduct, a listed asset with far reaching views from the Gainsborough Line, a large number of other heritage assets in close proximity, and landscape impacts in the wide and open Colne Valley at this location). It is incorrect to state, as the Applicant does, that “in purely landscape and visual terms, this route to the west may be considered preferable.” In addition, stakeholders, including the Parish Councils of Wakes Colne and Chappel, have had no opportunity to submit feedback about this route. To this end, we include a letter from Wakes Colne Parish Council as Appendix E.	The Applicant acknowledges that more western routes are overall less preferred and also notes that it has considered more western crossings of the Colne Valley as set out in APP-122 in Section 7.3. It does not consider them preferred overall with effects transferred between similar assets and features.. The reference to a preference in purely landscape and visual terms for a route to the west is in reference to the route set out in Figure 7,4 in APP-122 and as assessed by our expert teamThe Applicants assessment concludes that the connection as an overhead line technology on the proposed alignment is consistent with Policy. Others of course may take a different view and consider that on this basis there should be consideration of the use of underground cables for the Colne Valley. Whilst the Applicant disagrees with the need for this, we have reviewed what an option may look like. Underground Cable options: • A minimum crossing requirement would be to use the cable for the valley crossing only. To the north of the River Colne a CSE compound location around TB47 may be appropriate, being back clothed in one direction with cable routeing to the south of the Order Limits to seek to reduce the interaction with areas of heritage interest identified. For a CSE compound on the south side of the river, an initial consideration of Horlock rules leads to a location south of TB50 to the east side of Fiddlers Wood which benefits from being back-clothed to a degree. This is a route of around 1.2 km in length with limited net benefit as
Appendix E. Wakes Colne Parish Council comments on the Colne Valley		
Appendix F. Chappel Parish Council comments on the Colne Valley		

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		effects arising from two CSE compounds may offset the benefits of the removal of a section of overhead line. • To avoid locations where the benefit of removing some pylons may be offset by the effects of CSE compounds, there may need to be around 2.7 km of cable. A CSE compound north of the river would, as an example, need to be moved to the vicinity of TB45 and to the south a relocation to around TB53 may provide a basis for design. It is noted that feedback also refers to extending cables to a total of around 7 km of cable from the Great Horkesley Tilbury side CSE compound through to the south of Aldham. • EN-5 sets out from paragraph 2.9.24 the Secretary of States decision making in circumstances that the test at 2.9.23 is engaged. The Applicant’s view is that not only is the test at 2.9.23 not engaged, but that even if it was, the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents. • EN-5 policy then goes on to state at paragraph 2.9.24 “The Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: the adverse implications of the overhead line proposal; the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure’ • EN-5 paragraph 2.9.25 states: ‘In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents’
Comments on Document 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points	<i>PEA submit information on the cultural significance of the Colne Valley and photographs of drone footage of the area.</i>	Although it is not possible to ascertain the exact location or zoom factor of the photography provided, the Applicant has made the following observations. The aerial photography is a useful reference in terms of landscape context, tree and woodland cover, field and settlement pattern and local roads. In relation to the photography illustrating the tip of Aldham Church spire and the view from Chappel Viaduct, the Applicant notes that Chappel is approximately 3 km to the north-west of Aldham and approximately the same distance west of Fordham. At this distance, pylons would appear as very small features in a view. For example, Viewpoint 4.35: PRoW, Hemps Green (Fordham 5) is approximately 2.17 km from the nearest structure. The associated wireframe on PDF pages 111 and 113 in 7.12 Visualisations - Part 5 of 9 [APP-347] illustrates how small the Project would appear in the view at this distance which is approximately 1 km closer than Chappel. Aldham Church sits at a slightly higher elevation than the Project due to land sloping down to the east of the church. With regard to the view from ‘public access woodland’ it is not clear what the viewing direction is and therefore not possible to ascertain where the Project may be in the view. The Applicant notes that over time, as the woodland matures this view will likely become more heavily filtered.
Appendix C Legal Opinion from Lord Charles Banner KC	<i>Note: Please refer to Appendix D3 of this document</i>	<i>Note: Please refer to Appendix D3 of this document for the Applicant’s detailed response.</i>

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Appendix D The Landscape Partnership report	PEA have provided a Landscape Sensitivity Appraisal for the Colne Valley by The Landscape Partnership, as separate Appendix D, accompanied by photos (Appendix Di) and by the Whole Route Sensitivity Appraisal submitted to the Applicant during the Statutory Consultation (Appendix Dii) and its accompanying Appendix (Diii).	<i>Note: Please refer to Appendix D2 of this document for the Applicant’s detailed response.</i>
Appendix G Good Design	In addition to the points regarding alternatives as stated above, PEA Appendix G Good Design considers the matter of independent design review. In summary this states: • Independent design review is important and recognised in the Design Principles for National Infrastructure published by the National Infrastructure Commission in 2020 and both the 2023 and 2025 versions of the Overarching National Policy Statement for Energy (EN-1). • NIC “Design Principles for National Infrastructure” report was published in February 2020 and therefore significantly in advance of the project inception in 2022. There was therefore sufficient time for the advice to be applied to the Project. • PINS Section 51 advice referred to NIC guidance and the use of design champions and design panels. • ‘Independent’ is a fundamental principle of the guidance. • The Applicant’s use of ‘detailed design’ and ‘post-consent’ apply at the end of the process. • PEA considers independent and early design review is vital to inform the design and represent best practice in achieving good design.	Independent Design Review and Design Principles It is concluded in 7.15 DAS [Revision C] and 7.16 DASSI (Revision D) that the Project satisfies the good design criteria identified within Overarching National Policy Statement (NPS) for Energy (EN-1) (2024) and NPS for Electricity Networks Infrastructure (EN-5) (2024). The DAS and DASSI both demonstrate how the Planning Inspectorate’s Advice on Good Design⁹ and National Infrastructure Commission Design Principles for National Infrastructure ¹⁰have been given due regard during the development of the Project. NPS EN-1 and EN-5 (2024) do not impose a requirement for applicants to undertake an independent design review. For electricity transmission projects, NPS EN-5 Paragraph 2.4.3 states: ‘...the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant’s ability to influence the aesthetic appearance of that infrastructure’. This demonstrates the importance placed on the ‘functionality’ of design which restricts the extent of design variation. Planning Inspectorate Section 51 Advice The minutes from the meeting with the Planning Inspectorate on 30 January 2023 records that ‘The Inspectorate advised the Applicant to consider and track the issue of design principles throughout the pre-application stage, particularly regarding the design of the substations. The Applicant was advised to take on board comments and guidance within the National Infrastructure Commission Report, including regarding design champions and design panels. The Applicant explained that its team has a well-integrated design process, noting the relationship between the engineers and environment team and how this optimised the design from an environmental perspective’. Applicant’s Approach to Good Design The Applicant maintains that due to the technical electrical design considerations, there is very limited scope for an independent design panel to meaningfully inform design. We have updated 7.16 DASSI [Revision D] with a new design principle on Substation Design Co-ordination. This design principle provides assurance that key documents will remain co-ordinated as they are developed, reflecting the co-location of the substations and the need for aligned plans and documentation. The Applicant also proposes to establish a Design Review Panel (DRP), hosted by the Great Grid Partnership, to undertake robust design reviews. The DASSI has been updated at Chapter 6 with a design governance model that includes details of a design review process which will be adopted to secure good design. The DRP for Norwich to Tilbury will undertake design reviews post-consent, and is proposed to include the following representatives, comprising multi-disciplinary experts linking good design principles to other topic areas holistically: • Chair – Arcadis Independent Design Advisor • Great Grid Partnership (GGP) Design Executive Technical and Design Assurance lead • Development Design Champion (DDC)

⁹⁹Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents*. [online] Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-the-preparation-and-submission-of-application-documents>.

¹⁰ National Infrastructure Commission (2020). *Design Principles for National Infrastructure*. [online] Available at: <https://majorprojects.org/wp-content/uploads/2024/10/NIC-Design-Principles.pdf>.

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		• National Grid Head of Environment and Sustainability • National Grid Strategic BNG lead • National Grid Strategic landscape + placemaking lead • National Grid Community Liaison Officer. • Where relevant, the following external stakeholders will also be invited onto the panel: • Representatives of Local Planning Authorities • Dedham Vale National Landscape Partnership Manager • Representatives of North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm project teams • Representative of the local Wildlife Trust. Design review of the substations will include a nominated representative of the relevant Local Planning Authorities by invitation. For the EACN substation, the DRP will also include representatives of the North Falls and Five Estuaries project teams and will seek to have regard for the conclusions of the Joint Substations Design Guide. This approach will seek a more cohesive design that includes co-ordination of the proposed cumulative infrastructure. The Design Review for the EACN substation will also include consideration of landscape proposals for North Falls and Five Estuaries to tie together a coherent landscape scheme. The design principles in the DASSI will facilitate a holistic approach to other topic areas including links with Local Nature Recovery Strategies when final details of the Landscape and Management Plan are submitted for discharge of requirement 4 (construction management plans) of 3.1 Draft Development Consent Order [Revision F]. The Applicant considers there is sufficient design content secured in the DASSI and where there is scope for variation at the detailed design stage, appropriate good design mechanisms are proposed in the updated DASSI. For the proposed EACN, this includes a multi-disciplinary design review of the interlinkages between the three proposed substations against the requirements of their respective DCOs.
Appendix H ExQ2 comments	Appendix H provides the Applicant’s response to HE 2.8 and HE 2.9 of ExQ2, which were directed at PEA.	The Applicant has responded to these matters in 8.4.15 Applicant's Comments on Responses to ExQ2 [Revision A] .
Appendix I Virginia Brewer, Rebuttal to Applicant’s comments	Introduction This document responds to the Applicant’s comments on PEA Appendix F – Heritage Pylons East Anglia Response dated 10 April 2026 [REP3-134], as set out in Chapter 5 of 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 in the Norwich to Tilbury examination (EN020027). PEA considers it necessary to reply because the Applicant’s comments do not, in PEA’s respectful submission, properly answer the substance of the heritage concerns previously raised. Instead, the Applicant repeatedly relies on generic references to the methodology, to previous responses, and to the assertion that the assessments of heritage assets are “proportionate and appropriate”. The issues raised in REP3-134 related to whether that methodology has been correctly and consistently applied, and whether the Applicant has in fact demonstrated, in accordance with the NPPF and Historic England’s GPA3, how setting contributes to significance and how the Project affects that significance. This response is therefore not intended to repeat every point already made in REP3-134, but to explain why the Applicant’s comments to REP3-134 do not resolve the central concerns previously identified. It should also be read as selective and illustrative only: PEA is a charity with limited resources and cannot reasonably provide a rebuttal to all the affected heritage assets. The examples addressed here are intended to assist the Examining Authority by highlighting	The Applicant acknowledges Pylons East Anglia’s comments regarding the application of the assessment methodology and the consideration of setting and significance. The Applicant’s position on these matters has been addressed in detail in 8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202], which signposts responses provided in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300], 8.17 Response to Rule 17 Letter – Historic Environment [REP4-318], and 8.9.1 Applicant’s Responses to First Written Questions [REP3-074]. As set out in those submissions, the Applicant has addressed matters relating to the assessment methodology, the assessment of setting, the consideration of cumulative effects, and the classification of harm, including substantial harm. These responses demonstrate that the methodology, informed by the National Planning Policy Framework (NPPF) and Historic England’s Good Practice Advice Note 3 (GPA3), has been applied consistently in practice on an asset-by-asset basis, with the contribution of setting to significance identified and the effects of the Project assessed accordingly. The Applicant does not agree that its responses rely solely on generic references or fail to address the substance of the concerns raised. The Environmental Statement and subsequent examination submissions include asset-specific assessments informed by site visits, baseline data and professional judgement, and explain how setting contributes to significance and how that significance is affected by the Project.

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	recurring methodological weaknesses in the Applicant’s heritage case, to demonstrate broader and recurring flaws in the Applicant’s approach to the assessment of setting and the evaluation of the contribution that setting makes to significance, and the resulting assessment of harm. The fact that only selected assets are addressed in this submission should not be taken to mean that concerns arise only in those cases.	
Appendix I Virginia Brewer, Rebuttal to Applicant’s comments	Policy and Guidance Context The National Planning Policy Framework (“NPPF”) requires applicants to describe the significance of any heritage assets affected by a proposal, including any contribution made by their setting, at a level of detail proportionate to the assets’ importance and sufficient to understand the likely impact of the proposal on their significance. It also requires decision-makers to identify and assess the particular significance of any heritage asset that may be affected, including by development affecting its setting, so as to avoid or minimise conflict between the asset’s conservation and any aspect of the proposal. The NPPF further provides that great weight should be given to the conservation of designated heritage assets, irrespective of whether harm amounts to substantial harm or less than substantial harm, and that a balanced judgement is required in relation to non-designated heritage assets having regard to the scale of harm or loss and the significance of the asset. Historic England’s The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (“GPA3”) sets out a staged approach to proportionate decision-taking. That approach requires: (a) identifying which heritage assets and settings are affected; (b) assessing the degree to which those settings contribute to significance or allow significance to be appreciated; (c) assessing the effects of the proposed development on that significance; (d) exploring ways to maximise enhancement and avoid or minimise harm; and (e) making and documenting the decision. GPA3 also makes clear that setting is more than visibility alone and may derive significance from wider visual, spatial, functional, historical and associative relationships. The Applicant’s own Environmental Statement recognises that, where proposed development would affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact, and that the historic environment chapter is intended to assess setting and indirect effects on built heritage during construction and operation. The Environmental Statement also confirms that EN-1 paragraphs on heritage, including those relating to archaeological assessment, less than substantial harm and non-designated assets, informed the chapter.	The Applicant notes the summary of the relevant policy and guidance framework and confirms that the historic environment assessment has been undertaken in accordance with the requirements of NPS EN-1, which is the principal policy against which this application is examined. The Applicant has also had regard to the relevant provisions of the NPPF and Historic England’s ‘The Setting of Heritage Assets: Historic Environment Good Practice in Planning Note 3 (GPA3). As set out in 6.11 Environmental Statement Chapter 11- Historic Environment [Revision C], paragraph 11.2.19, the assessment follows the five-step approach advocated by GPA3. The detail of steps 1 and 2 is provided in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision B] and step 3 is provided by 6.11 Environmental Statement Chapter 11- Historic Environment [Revision C] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [Revision C]. Step 4 was undertaken throughout the development of the Project as the assessment progressed and the documentation of the decision element of step 5 as set out in is captured in 5.15 Design Development Report [APP-122], 7.20 2023 - Design Development Report for the Project [APP-358] and 7.21 2024 - Design Development Report for the Project [APP-359]. Consistent with GPA3 and the NPPF, the assessment considers setting as a multifaceted concept that extends beyond intervisibility alone and includes spatial, historical, functional and associative relationships where relevant. The assessment has therefore not relied solely on visibility-based analysis in determining effects on heritage significance. The Applicant therefore considers that the historic environment assessment has been undertaken in accordance with the relevant policy and guidance framework and provides a proportionate and robust basis for the Examining Authority’s consideration of likely effects on designated and non-designated heritage assets.
Appendix I Virginia Brewer, Rebuttal to Applicant’s comments	Methodology The Applicant places weight on the fact that its heritage methodology was discussed with Historic England and other consultees through the scoping and pre-application process. PEA accepts that the draft Statement of Common Ground between the Applicant and Historic England records extensive pre-application discussion on methodology, study areas, data sources and assessment approach, and that Historic England was broadly content with aspects of the methodology at a strategic level. Certain methodological matters were later recorded as agreed. However, the same material also records that Historic England regarded representative wirelines as crucial to evidencing potential visual impacts on	The Applicant acknowledges Pylons East Anglia’s comments regarding the distinction between agreement on methodology and its application. The Applicant acknowledges that agreement at a strategic level does not in itself imply agreement with every individual assessment. However, the Environmental Statement and subsequent examination submissions demonstrate that the agreed methodology has been applied in practice on an asset-by-asset basis, including the identification of the contribution of setting to significance and the assessment of the effects of the Project on that significance and that conclusions of assessment are agreed with Historic England for the vast majority of heritage assets potentially affected by the Project.

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	designated heritage assets. It does not demonstrate blanket agreement with every asset-specific assessment, every judgment about the extent of setting, or every level of harm reached by the Applicant. Agreement in principle to a broad methodology is not equivalent to agreement that the methodology has been correctly, consistently or adequately applied in each individual case	As set out in 8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202] , the assessment has been informed by site visits, baseline data, professional judgement and supporting visualisations where appropriate. The Applicant therefore considers that the methodology has been applied consistently and appropriately across the assessment.
Appendix I Virginia Brewer, Rebuttal to Applicant’s comments	The Proper Meaning of “Proportionate” Assessment PEA’s concern is not with proportionality as a principle. The concern is that the Applicant repeatedly uses the phrase “proportionate and appropriate” as a substitute for transparent analysis and as a means of defending conclusions that have not been adequately reasoned against the policy and guidance framework. Proportionality in heritage policy does not mean that assessment may be abbreviated, narrowed or omitted simply because the Applicant considers a significant effect unlikely. Rather, proportionality requires that enough information is provided to enable an informed decision to be made on the significance of the asset, the contribution made by its setting, and the effect of the proposal on that significance, as prescribed by the NPPF and GPA3. In PEA’s respectful submission, the Applicant too often uses the language of proportionality to justify a process whereby assets are first categorised by reference to the Applicant’s own matrix, the likely level of effect is effectively capped by that matrix, and that capped outcome is then used as the reason not to undertake the more detailed setting assessment that might test whether the conclusion is sound. This is especially problematic in relation to non-designated heritage assets, where a balanced judgement is still required and sufficient information is still needed to understand the scale of harm and the significance of the asset.	The Applicant acknowledges Pylons East Anglia’s comments regarding the interpretation of ‘proportionate’ assessment and the application of this principle to both designated and non-designated heritage assets. The Applicant’s position on these matters has been addressed in 8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202] and in 8.26 Response to Rule 17 Letter received 5th June 2026 [REP5A-003] which signpost detailed responses provided in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300] and 8.17 Response to Rule 17 Letter – Historic Environment [REP4-318]. As set out in those submissions, the Applicant has addressed matters relating to the assessment methodology, the assessment of setting, the consideration of cumulative effects, and the classification of harm, including substantial harm. The assessment considers each asset individually, its value, significance and the contribution made by its setting and relationships with other heritage assets, based on site visits, baseline data and professional judgement. In relation to non-designated heritage assets, the Applicant confirms, as set out in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300] page 47-48, that their significance and the effects of the Project have been assessed in accordance with the NPPF requirement for a balanced judgement, as reflected in the Environmental Statement. This process provides sufficient information to understand the contribution made by setting and the effect of the Project on that significance. Therefore, the Environmental Statement and subsequent submissions provide a clear basis for understanding the significance of assets, including non-designated heritage assets, and the effects of the Project on that significance.
Appendix I Virginia Brewer, Rebuttal to Applicant’s comments	The Applicant’s Reliance on Methodology, Mitigation and Generic Assertions A recurring feature of the Applicant’s comments on REP3-134 is that they do not directly address the asset-specific criticisms raised by PEA. Instead, the Applicant frequently responds by referring back to its own methodology, signposting earlier responses or simply asserting that the conclusion is “proportionate and appropriate”. In PEA’s respectful submission, that is not sufficient. The fact that the Applicant refers back to its methodology is not an answer where the application of that methodology is itself under challenge. GPA3 makes clear that setting is not limited to whether land remains in the same use; it concerns the surroundings in which an asset is experienced and the extent to which those surroundings contribute to significance or allow significance to be appreciated. The fact that farmland remains farmland does not answer the question whether the introduction of 50m pylons and a substantial wirescape industrialises the experience of a rural heritage asset and harms the significance derived from its landscape context. Likewise, repeated reference to vegetation or intermittent screening does not of itself justify a conclusion of negligible or low harm. GPA3 makes clear that views are only one component of setting. The contribution setting makes to significance may be visual, spatial, historical, functional or associative. Existing vegetation may filter views, but it does not remove the presence of large-scale permanent overhead line infrastructure within the setting of an asset. h is experienced within the landscape may include alternative views which are not impeded by vegetation or other features which the Applicant is relying on for mitigation.	The Applicant acknowledges Pylons East Anglia’s comments regarding the approach to assessment and the manner in which responses have addressed asset-specific concerns. The Applicant does not agree that its responses rely solely on generic statements or fail to engage with the substance of the points raised. As set out in 8.4.13.1 Applicant’s Response to Pylons East Anglia’s Comments on its ExQ1 Responses [REP5-202], and in 8.4.10.1 Applicant’s Comments on Pylons East Anglia Response to ExQ1 [REP4-300], the Applicant has provided asset-specific responses addressing matters such as setting, landscape context and the contribution of surroundings to the significance of heritage assets. Where responses signpost to earlier submissions, this is intended to provide clarity and avoid unnecessary repetition, ensuring that the relevant information can be readily located within the examination documents, rather than duplicating extensive material across multiple responses. The Applicant further confirms that the assessment of setting is not limited to consideration of visibility alone. As set out in the Environmental Statement and subsequent responses, the assessment considers the contribution of visual, spatial, functional and historical relationships, informed by site visits, baseline data and professional judgement. Also, the presence of vegetation and intervening features is considered as part of that wider assessment and does not form the sole basis for conclusions. The assessment therefore considers how heritage assets are experienced within their surroundings, including the effects of the Project on that experience.

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Appendix I Virginia Brewer, Rebuttal to Applicant's comments	Illustrative Examples of Asset-Specific Concerns NDHAs, Farmsteads and Farmyard Groups The Applicant's position in respect of Washbrook Street (3160) NDHA is a clear example of the flaw identified above. The Applicant states that assets assessed as low or negligible value and located outside the Order Limits did not have a setting assessment undertaken because, in the absence of physical impacts, there was no potential for significant effects. In PEA's submission, that is precisely the issue in dispute: where pylons and wires would dominate the immediate surroundings of a rural asset, a setting assessment is needed before it can properly be concluded that no significant effect could arise. Similar concerns arise in relation to Canes Farmhouse (Grade II, 1036949) and Canes Farmstead (3052) NDHA, where the Applicant accepts that setting makes a considerable contribution to value but then simply asserts that that setting is restricted to the farmyard and immediate agricultural landscape and does not extend to the Order Limits. PEA respectfully submits that such a conclusion requires transparent explanation, particularly for a farmstead whose significance is closely related to its wider agricultural context. The same point arises in relation to Bleak Hall Farmstead, where the Applicant appears to minimise the heritage effect of construction-phase groundworks on the basis that only a small proportion of land around the buildings lies within the Order Limits, notwithstanding the concern that the NDHA would be directly impacted by the proposed scheme.. Listed Farmhouses, Halls and Churches In relation to Mott's Farmhouse (Grade II, 1266736) and Motts Farmstead (4214) NDHA, the Applicant accepts that the setting makes a considerable contribution to significance and extends to the Order Limits, yet concludes that the Project would result in "no change" and "no harm" during operation. PEA respectfully submits that this conclusion is inadequately reasoned. The introduction of major overhead line infrastructure into the setting of a secluded farm complex cannot be dismissed by generic reference to retained countryside or mature vegetation, without a clearer explanation of why the rural and historic context of the asset is said to be unaffected. Similar concerns arise in relation to Little Tey House (Grade II, 1266823) and the Barn to the South West of Little Tey House (Grade II, 1266779). The Applicant accepts that the setting makes a considerable contribution to value and extends to the Order Limits, but concludes that the effect amounts only to mid less than substantial harm. PEA's concern is that the visual evidence provided by the visualisations shows large pylons and wires in such close proximity to the listed buildings that the rural setting and the functional and historical relationship between house and barn and wider agricultural landscape are severely compromised. In those circumstances, the Applicant has not convincingly demonstrated why a higher level of harm is not appropriate. The same issue arises at Wyfields Farmhouse (1337057) and the Barn (1111646) Grade II, where the Applicant focuses on whether the Project would diminish the understanding of the asset as the heart of a working farm complex, but does not properly address the effect on the wider farmland and historic landscape setting in which that working complex has traditionally been experienced. At Bragg (Grade II, 1267411), and by extension the wider group including Gull Cottage and Broadgreen Farmhouse (also Grade II), the Applicant again relies on partial screening, mature vegetation and retained rural land beneath the line. PEA respectfully submits that this does not assess the heritage impact of the scheme on the significance of these heritage assets: the issue is whether the landscape setting	The Applicant acknowledges Pylons East Anglia's comments and confirms that the asset-specific matters raised have been reviewed. The points raised in respect of the heritage assets listed above have previously been considered and addressed in detail within 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], where asset-specific responses are provided. The Applicant confirms that the assessment has been undertaken using an agreed methodology, which has been subject to consultation with Historic England and Local Planning Authorities and is reflected in the Statements of Common Ground. This methodology has been applied consistently across the assessment, including in relation to the contribution of setting to significance and the assessment of effects on individual assets. The Applicant has provided full and sufficient information regarding these matters throughout the Examination and maintains the consistent position set out in its earlier and current submissions. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates its previously stated position.

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	has been harmed as a result of the industrialisation of the landscape, not simply whether agriculture can continue beneath it. Likewise, in relation to Sudbury’s Farmhouse (Grade II, 1170946) and Wardropers Farmhouse (Grade II, 1293259), the reliance on vegetation screening fails to address the more fundamental point that the historic and functional relationship between these farmhouses and their surrounding agricultural land would be materially altered by very large pylons in close proximity. In relation to Bounds Farmhouse, Ardleigh (Grade II, List Entry No. 1147743), the Applicant’s conclusion that the asset would experience only mid less than substantial harm materially understates the true effect of the Project. Bounds Farmhouse would be affected by pylons, cable works, crossing works, drainage works, a permanent bund, the East Anglia Connection Node Substation and associated haul road infrastructure - all in very close proximity, fundamentally altering its rural agricultural setting and profoundly impacting the way in which the listed building is experienced. PEA is concerned that the Applicant’s assessment does not properly reflect the extent of that encroachment, nor does it transparently demonstrate, in accordance with the NPPF and GPA3, how the contribution made by setting to the significance of the asset has been assessed and why the resulting harm is said to remain at only a mid level of less than substantial harm. In PEA’s submission, the harm to Bounds Farmhouse is greater than the Applicant acknowledges In relation to Great Warley Hall (Grade II, 1123449), its associated barns (Grade II) and the moated site (NDHA), the Applicant again places weight on retained countryside beneath and around the proposed overhead line. PEA respectfully submits that again fails to assess the impact of the scheme on the significance of the heritage assets as the very landscape that contributes to the significance of those assets would itself be irrevocably altered by the Project. Similar concerns apply to Dunton Hall (Grade II, 1338380) and the associated moat (NDHA) and DMV (NDHA). The Applicant acknowledges the relationship between those assets as part of a medieval landscape, but then concludes that the impact is low adverse and the residual effect minor adverse. In PEA’s submission, the effect of pylons TB227–TB231 on the change of the contribution that the agricultural and historic landscape makes to these assets has been omitted from assessment. Kenningham Hall (Grade II, 1373056), together with the associated DMV (1010) and related outbuildings to the farmstead, also gives rise to a concern about the adequacy of the baseline itself. PEA’s concern is that historic buildings associated with Kenningham Hall, shown on nineteenth-century mapping and potentially curtilage listed, do not appear to have been properly recognised despite lying within the draft Order Limits and beneath the proposed line. This is despite a walkover survey in addition to a supposed desk based assessment. If the baseline information is incomplete, the resulting assessment cannot properly be said to be robust, proportionate or appropriate. In relation to the Church of St Mary (Grade II, 1122253), the Applicant accepts that the setting extends to the Order Limits and that pylons TB228–TB231 would be introduced approximately 200 metres away, yet concludes that the effect would amount only to mid less than substantial harm. PEA respectfully submits that the photomontages demonstrate a more severe compromise to the church’s historic rural setting than the Applicant acknowledges. This is an example where the Applicant claims to have undertaken a settings assessment in accordance with GPA3 but in reality has failed to show how the large-scale infrastructure (which will dominate the church and its setting) will fundamentally alter the way in which the church is experienced and appreciated.	

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	Similar concerns arise in relation to Flordon Hall and the associated piggery and barn, where the Applicant relies on the orientation of the principal elevation and on intervening vegetation and buildings. PEA's point is that the associated farm buildings are heritage assets with agricultural settings in their own right and should not be treated merely as subordinate to the Hall's own assessment has been ignored by the Applicant. In relation to Feeringbury Manor (Grade II, 1306710) and the associated outbuilding, barn and waterwheel, Historic England considered that the Applicant's assessment appeared too focused on outward views from the farmstead and that the visual material suggested greater dominance of pylons when approaching the asset complex, particularly from the eastern entrance to the farmyard and potentially from the south. PEA respectfully submits that the Applicant has not meaningfully addressed that concern and has instead continued to rely on mature vegetation, topography and distance so as to maintain a lower harm conclusion. That approach appears to underplay the importance of arrival, approach and experienced setting for a historic farm complex of this kind.	
Appendix I Virginia Brewer, Rebuttal to Applicant's comments	Conservation Areas The same broader methodological weakness arises across multiple conservation areas, including Tacolneston Conservation Area, Winfarthing Conservation Area, Mellis Conservation Area, Ardleigh Conservation Area, Ford Street Conservation Area, Great Waltham Conservation Area, Little Waltham Conservation Area (including Langleys). In each of these cases, PEA's concern is that the contribution made by the surrounding rural landscape, historic approaches, agricultural setting, common land, or the experience of the conservation area as a whole has been undervalued, with the result that the level of harm has been underestimated. That concern is especially acute at Mellis Conservation Area, where Historic England itself identified the common at the heart of the conservation area and the agricultural setting of that common as being of particular importance, and expressed concern that the visual material did not fully represent the full impact on the landscape setting and that the harm might be closer to mid-level less than substantial harm than the Applicant had concluded. Regardless of this response, the Applicant has relied on its original assessment which it continues to claim as fact rather than subjective. Similar issues arise at Ford Street Conservation Area, where the Applicant concludes mid less than substantial harm, notwithstanding PEA's concern that the visual evidence indicates severe harm to setting; and at Ardleigh Conservation Area, where PEA respectfully disagrees with the Applicant's conclusion that the asset is subject only to a low adverse magnitude of impact and minor adverse significance of effect, given the concern that large infrastructure would surround the conservation area on three sides, dominating and ruining the idyllic surroundings of the village and severely affect its setting.	The Applicant acknowledges Pylons East Anglia's comments regarding the assessment of effects on conservation areas and the contribution of wider landscape context to their significance. The matters raised in respect of the conservation areas listed above have previously been considered and addressed within 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300], where asset-specific responses are provided, including in relation to Mellis, Fordstreet, Ardleigh and Great and Little Waltham Conservation Areas. The Applicant confirms that the assessment has been undertaken using an established methodology that was subject to consultation with Historic England and Local Planning Authorities and is reflected in the Statements of Common Ground. This methodology has been applied consistently across the assessment, including in relation to the identification of how setting, including wider rural and landscape context, contributes to the significance of conservation areas and how the Project affects that significance. The Applicant has provided full and sufficient information regarding these matters throughout the Examination and maintains the consistent position set out in its earlier and current submissions. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates its previously stated position.
Appendix I Virginia Brewer, Rebuttal to Applicant's comments	Planning Balance and the Treatment of Harm PEA recognises that the Project is advanced within the policy framework of the National Policy Statements for energy infrastructure and that the Applicant seeks to rely on the strong starting presumption in favour of overhead lines under EN-5 and the treatment of critical national priority infrastructure under EN-1. EN-1 also states that the Secretary of State must decide applications in accordance with the relevant NPSs unless specified exceptions apply, and that applicants should ensure that their applications and supporting material are consistent with those NPS requirements.	The Applicant acknowledges Pylons East Anglia's comments regarding the distinction between the assessment of heritage effects and the subsequent planning balance. The Applicant agrees that the existence of policy support for the Project does not remove the requirement to undertake a robust, evidence-based assessment of impacts on heritage assets and their settings. However, the Applicant does not agree with the assertion that the assessment has underestimated the contribution of setting to heritage significance or that the extent of heritage harm has been under-reported. The assessment has been undertaken in accordance with the relevant legislative framework, NPS EN-1, relevant provisions of the NPPF, and Historic England's GPA3 guidance. The significance of heritage assets, the contribution made by their

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	However, those policy considerations do not displace the need for a lawful, evidence-based and properly reasoned assessment of heritage harm in the first place. The existence of urgent need or policy support for a form of infrastructure does not eliminate the requirement to understand the significance of affected heritage assets, the contribution made by their setting, and the true scale of harm that would arise. Nor does the fact that the Applicant has concluded that no substantial harm would arise mean that the underlying assessment should be accepted without scrutiny. The NPPF requires great weight to be given to the conservation of designated heritage assets irrespective of whether harm is substantial or less than substantial, and any harm to significance requires clear and convincing justification. PEA respectfully submits that, where the Applicant has under-assessed the contribution of setting to significance, the planning balance is correspondingly skewed because the true scale of heritage harm has not been properly accounted for.	settings, and the effects of the Project on that significance have been assessed through a structured and proportionate methodology, developed in accordance with relevant legislation, policy and guidance, and has been subject to consultation with Historic England and Local Planning Authorities, as reflected in the Statements of Common Ground. The Applicant also rejects the suggestion that the assessment conclusions should be afforded less weight because the Project benefits from strong policy support. The assessment of heritage effects and the planning balance are separate exercises. The Environmental Statement first identifies and assesses likely effects on heritage assets, including instances of less than substantial harm where relevant. Those effects are then capable of being weighed by the decision-maker against the substantial benefits of the Project in accordance with the applicable policy framework. The Applicant considers that the assessment has appropriately identified and reported heritage effects, including effects arising from changes to setting, and that the conclusions reached are robust, proportionate and evidence-based. Any disagreement with the professional judgements reached does not indicate a deficiency in the methodology or assessment. Therefore, the Applicant does not have any further information to add to those responses at this stage and maintains their position.
Appendix I Virginia Brewer, Rebuttal to Applicant's comments	Conclusion The examples above demonstrate a recurring and material weakness in the Applicant's heritage case. PEA's submission is that the Applicant too often relies on formulaic references to methodology in place of proper assessment, while continuing to assert, on the basis of its own inadequate analysis, that its conclusions are proportionate and accurate. The Applicant repeatedly invokes retained agricultural use, partial screening and high-level policy compliance, rather than transparently demonstrating the staged reasoning required by the NPPF and GPA3. In many cases, the Applicant does not adequately show: (a) how the setting (and particularly the land on which the project is to be built upon) contributes to the significance of the relevant asset; (b) how the Project alters that contribution; (c) why the resulting harm should be categorised at the level asserted; or (d) what meaningful measures have been explored to avoid or minimise that harm. PEA respectfully requests that, where appropriate, the Applicant be required to provide clearer asset-by-asset explanation of: (a) the contribution made by setting to significance; (b) the effect of the proposal on that contribution; and (c) the evidential basis for the level of harm concluded. Finally, PEA repeats that this submission represents only a limited snapshot of a much wider historic environment case. PEA is a charity with limited resources. The fact that only a selection of heritage assets is addressed here should not be taken as implying that concerns are confined to those examples alone.	The Applicant acknowledges Pylons East Anglia's comments but does not agree with the characterisation of the historic environment assessment as being materially deficient or reliant on formulaic application of methodology. . The matters raised, including the contribution of setting to significance, the assessment of effects on that contribution, and the resulting level of harm, have been addressed in detail within the Environmental Statement and subsequent examination submissions, including 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] and 8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202]. The Applicant confirms that the assessment has been undertaken in accordance with the relevant legislative and policy framework, including NPS EN-1, the relevant provisions of the NPPF, and Historic England's GPA3 guidance, using an agreed methodology, developed in consultation with Historic England and Local Planning Authorities The Applicant does not accept that it has failed to demonstrate how setting contributes to significance, how the Project affects that contribution, or how judgements of harm have been reached. These matters are set out throughout the assessment, supported by site survey, professional judgement, assessment tables, narrative explanation and, where appropriate, visualisations. The fact that Pylons East Anglia reaches different conclusions on individual assets does not demonstrate that the Applicant's assessment is inadequate; rather, it reflects a difference in professional opinion regarding the interpretation of effects and the weighting of evidence. The Applicant has provided full and sufficient information regarding these matters throughout the Examination and maintains the consistent position set out in its earlier and current submissions. The Applicant does not consider that any material new issues have been raised and therefore relies on, and reiterates, its previously stated position.

Appendix D2 Applicant's Comments to Pylons East Anglia Appendix D - Landscape Partnership Report [REP5-277]

Appendix D2.

Applicant’s Comments to Pylons East Anglia Appendix D - Landscape Partnership Report [REP5-277]

Table D.2 Applicant’s Comments to Pylons East Anglia Appendix D - Landscape Partnership Report [REP5-277]

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Executive summary (<i>extracted paragraphs</i>) The Area of Interest for the appraisal extends across the Colne Valley and adjoining plateau landscapes between the Dedham Vale National Landscape and the Roman River valley. It comprises a distinctive and interconnected landscape of river valleys, tributary valleys, rolling farmland, woodland, wetlands, historic settlements, rural lanes and recreational routes, which collectively contribute to a strong sense of place, local distinctiveness and landscape value. The review broadly agrees with the N2T LVIA findings regarding the sensitivity of the principal Colne Valley landscapes. However, it also identifies two localised landscape character areas, the Grove Tributary Valley and the Roman River Corridor, that exhibit characteristics materially different from the wider plateau landscapes within which they occur. These areas contain concentrations of ecological, historic, cultural and perceptual features that contribute to elevated landscape sensitivity and are considered capable of experiencing substantial effects from the proposed development. The appraisal identifies High landscape sensitivity within the Colne River Valley Floor, Colne River Valley Slopes, Grove Tributary Valley and Roman River Corridor. Collectively, these areas form a connected landscape framework extending through the Area of Interest. In line with the NT2 LVIA, the findings of the appraisal indicate that there is the potential for Significant landscape effects to occur across a substantial and continuous section of the route corridor rather than being confined to isolated locations. Review of the visual assessment similarly indicates the potential for widespread and Significant adverse visual effects affecting a broad range of receptors, including walkers, recreational users, road users and local communities; again in line with the N2T LVIA. Both studies show that the effects identified are not limited to a small number of representative viewpoints but have the potential to be experienced across extensive parts of the valley landscape and associated public access network.	The Applicant notes that the Area of Interest is experienced as one connected landscape by virtue of the fact several landscape character areas (LCAs) sit alongside each other rather than the area being viewed as one. The character of the landscape within the Area of Interest is varied. This is reflected in the descriptions for each of the published landscape character areas (LCA). The Landscape Partnership (TLP) report identifies two local landscape character areas (LLCA): B5a Grove Tributary Valley LLCA, and B2/B4 Roman River Corridor LLCA. These are subset areas within B2 Easthorpe Farmland Plateau LCA, B4 Great Tey Farmland Plateau and B5 Rochford’s Farmland Plateau LCA. The Applicant accepts that localised landscape character inevitably varies to some degree within LCAs; however, neither published landscape character assessments nor the LVIA have drawn these areas out as being distinctly different at the scale assessed. This is therefore considered to be a matter of differing professional opinion. The Applicant notes The Landscape Partnership (TLP) report broadly agrees with the landscape sensitivity judgements reported in the LVIA. The landscape assessment has been undertaken in a proportionate and consistent manner across the Study Area; reflective of the scale of the Project. The LVIA is based on recognised, published landscape character assessments. Landscape sensitivity will inevitably vary within LCAs but the overall judgements remain fair and valid. The Applicant considers that the overall sensitivity judgements and resulting assessment conclusions remain robust and appropriate, and stands by the assessment of landscape sensitivity and landscape effects as reported in the LVIA. The potential for significant effects is to be expected from the introduction of 400 kV overhead lines and is recognised in policy and has been transparently reported within the LVIA. Significant landscape effects within the Colne River Valley Slopes and Colne River Valley Floor are geographically limited and localised in extent and are generally contained within 1.5 km of the Project. In the context of the whole Project, the section of the Project through the Colne River Valley Slopes and Floor equates to approximately 2.5% of the length of the Project. The Applicants response to concerns raised about potential widespread effects are included below.
The appraisal also demonstrates that the Colne Valley and Roman River corridor have been consistently recognised through landscape studies, planning policy documents and green infrastructure strategies as landscapes of particular importance. These landscapes perform strategic functions in relation to ecological connectivity, recreation, heritage, countryside access and local identity.	The Applicant stands by the judgements made in relation to landscape value as reported in the LVIA. These judgements recognise the relatively higher value of the Colne Valley in the context of the overall Study Area for the Project.
A comparison with the Stour Valley section of the Norwich to Tilbury project, where undergrounding has been incorporated within the scheme, indicates that landscapes of comparable value occur within both sections of the route. Whilst the Dedham Vale National Landscape designation remains an important distinction, the comparison demonstrates that the Colne Valley contains extensive areas of landscape value and sensitivity that are comparable in several respects to those present within the underground cable section.	The proposal to underground the Project within the Stour Valley in Dedham Vale National Landscape accords with EN-5. This is because in accordance with EN-5 the presumption of overhead line is reversed within National Landscapes as acknowledged in paragraph 1.3.1 of The Landscape Partnership (TLP) report.
EN-5 recognises that, whilst overhead lines remain the starting presumption for electricity transmission infrastructure, consideration may be given to alternatives including undergrounding where there is potential for widespread and significant adverse landscape and/or visual effects. Importantly, the policy makes clear that such considerations are not confined to nationally designated landscapes and should be assessed on a case-by-case basis.	Consideration has been given to the route in this location (as has been done along the Project) based on consultation feedback and as part of the iterative design and assessment process. The Applicant does not consider that the EN-5 Policy test at 2.9.23 is engaged.

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Having regard to the identified landscape sensitivity, the concentration of significant landscape and visual effects, the strategic importance of the Colne Valley and Roman River corridors, and the provisions of EN-5, this appraisal concludes that there is a reasonable evidential basis for further consideration of localised undergrounding within this section of the route as a means of reducing landscape and visual effects. The appraisal does not seek to determine whether undergrounding should occur but concludes that the characteristics of the area are such that further examination of this option is justified within the decision-making framework established by EN-5.	The Applicants position is that the findings of the LVIA demonstrates that there is not a high potential for widespread and significant adverse landscape and/or visual impacts at the Colne Valley; albeit significant adverse landscape and visual effects are reported within approximately 1.5 km. Whilst there are locations where views of the Project extend into more elevated surrounding rural areas in the vicinity of the Colne Valley near Fordham Place, and into neighbouring lower-lying farmland near Aldham, intervening landform and vegetation filters views of parts of this section of the overhead line and typically limits more distant views. Effects within the lower-lying River Colne valley areas are generally contained by intervening topography on the valley sides along the meandering course of the river, combined with layers of mature and maturing vegetation, both of which filter or screen views from parts of the surrounding landscape. Landscape and visual effects beyond approximately 1.5 km are therefore judged to be not significant (note some significant visual effects up to approximately 2 km).
1 Introduction 1.3 Planning context for undergrounding within sensitive landscapes 1.3.1 The consideration of undergrounding within sensitive landscapes is reflected within national planning policy for electricity transmission infrastructure. National Policy Statement for Electricity Networks Infrastructure (EN-5) §2.9.21 identifies that overhead lines should be the strong starting presumption for electricity transmission infrastructure, whilst noting that “this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or National Landscape)”. In the latter circumstances, and where harm to the landscape, visual amenity and natural beauty cannot be avoided by re-routing, the strong starting presumption will be to underground the relevant section of the line. 1.3.2 Notwithstanding this, §2.9.24 recognises that cases will arise where: “though no part of the proposed development crosses a designated landscape, a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling”. 1.3.3 EN-5 notes that when considering underground options, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding against the adverse implications of the overhead line proposal; the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground of existing infrastructure [§2.9.25]. 1.3.4 They should only grant development consent for underground sections if they are satisfied that “the benefits accruing from alternative proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable” [§2.9.26]. In making this judgement, consideration should be given to several financial and environmental factors. Those of relevance to this appraisal include: • The landscape and visual baseline characteristics of the relevant section of the proposed route, and especially the impact on any high sensitivity visual receptors (as defined in the Guidelines for Landscape and Visual Impact Assessment¹ (GLVIA3), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including impacts on the setting of these designated features and areas). • The potentially very disruptive effects of undergrounding, including on landscape and visual amenity. The text notes that undergrounding an overhead line would mean digging a trench along the length of the route, and that as such, the works will often be more disruptive – albeit temporarily – to receptors than would an overhead line.	As a point of clarification, the Applicant notes the TLP report appears to reference the 2025 version of National Policy Statement for Electricity Networks Infrastructure (EN-5) and not the November 2023 version which is the primary version of EN-5 that the Application is being examined against. The Applicant’s assessment concludes that the connection as an overhead line technology on the proposed alignment is consistent with EN-1 and EN-5 and relevant policy. Others such may take a different view and consider that pursuant to paragraph 2.9.23 EN-5 there should be consideration of the use of underground cables for the Colne Valley. Whilst the Applicant disagrees with the need for this for the reasons stated, we have, to aid the Examination, reviewed what such an alternative undergrounding option might entail against the further policy tests in paragraphs 2.9.24 and 2.9.25 EN-5. Underground Cable options: • A minimum crossing requirement would be to use the cable for the valley crossing only. To the north of the River Colne a CSE compound location around TB47 may be appropriate, being back clothed in one direction with cable routeing to the south of the Order Limits to seek to reduce the interaction with areas of heritage interest identified. For a CSE compound on the south side of the river, an initial consideration of Horlock rules leads to a location south of TB50 to the east side of Fiddlers Wood which benefits from being back-clothed to a degree. This is a route of around 1.2 km in length with limited net benefit as effects arising from two CSE compounds may offset the benefits of the removal of a section of overhead line. • To avoid locations where the benefit of removing some pylons may be offset by the effects of CSE compounds, there may need to be around 2.7 km of cable. A CSE compound north of the river would, as an example, need to be moved to the vicinity of TB45 and to the south a relocation to around TB53 may provide a basis for design. It is noted that feedback also refers to extending cables to a total of around 7 km of cable from the Great Horkesley Tilbury side CSE compound through to the south of Aldham. • EN-5 sets out from paragraph 2.9.24 the Secretary of States decision making in circumstances that the test at 2.9.23 is engaged – EN-5 policy then goes on to state at paragraph 2.9.24 “The Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: the adverse implications of the overhead line proposal; the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure” – EN-5 paragraph 2.9.25 states: ‘In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead

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1.3.5 When making decisions, the Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (see Essex Suffolk Norfolk Pylons’ High-Level Landscape Sensitivity Appraisal) and that all feasible options for mitigation, including “the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately” [§2.11.3]. 1.3.6 EN-5 provides further clarification regarding the decision-making process at §2.11.6: Away from designated landscapes and in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate, having considered this on a case-by-case basis, weighing the considerations in paragraph 2.9.25 above.	alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents’ • The Applicant’s view is that not only is the test at 2.9.23 not engaged, but that even if it was, the benefits accruing from the underground proposal clearly do not outweigh the extra economic, social, or environmental impacts that it presents and therefore should not be taken forward.
2.6 National Policy Statement for Electricity Networks Infrastructure (EN-5) 2.6.1 As noted above, this appraisal has been undertaken having regard to the contents of National Policy Statement for Electricity Networks Infrastructure (EN-5), including its provisions relating to landscape and visual effects associated with overhead electricity transmission infrastructure. The findings are intended to provide an evidence base to inform consideration of whether the proposed overhead transmission infrastructure has the potential to give rise to widespread and significant adverse landscape and visual effects within the Colne Valley. 2.6.2 The appraisal is not intended to determine whether undergrounding should occur. Rather, it seeks to inform consideration of whether the circumstances described in EN-5 §§2.9.24 and 2.11.6 may arise within the Area of Interest.	As a point of clarification, the Applicant notes the TLP report appears to reference the 2025 version of National Policy Statement for Electricity Networks Infrastructure (EN-5) and not the November 2023 version which the Application is being examined against.
3.3 Localised Landscape Character Areas B5a – Grove Tributary Valley 3.3.5 This LLCA is located within the B5: Rochford’s Farmland Plateau landscape character area. While currently included within the wider plateau landscape LCA, the area exhibits a distinct combination of topographical, ecological and historic characteristics. 3.3.6 The area comprises a tributary valley landscape associated with an unnamed watercourse draining southwards towards the River Colne. The valley is characterised by a network of watercourses, ponds and associated riparian vegetation, creating a more enclosed and visually contained landscape than is generally evident within the wider Rochford’s Farmland Plateau. 3.3.7 The area also contains dispersed historic farmsteads and listed buildings, including The Grove, Highfield Farm and Spring Cottage, together with numerous Historic Environment Record assets and Protected Lanes, including Crabtree Lane, which collectively contribute to the area’s strong sense of history, time-depth and local distinctiveness.	The Applicant notes the description of B5a Grove Tributary Valley LLCA in paragraph 3.3.6 of the TLP report supports the location of the Great Horkesley Tilbury Side CSE compound in terms of visual containment relative to the wider plateau landscape; albeit the sense of containment is not as strong as further south down the tributary valley and the Colne River Valley itself.
3.3.14 The refined LLCAs identified above are not intended to replace the LCAs identified within the CLCA. Rather, they provide a more detailed understanding of character of the local landscape within specific parts of the Area of Interest and are used to inform the subsequent appraisal of landscape value, susceptibility, sensitivity and likely effects.	The Applicant notes the TLP report broadly agrees with the landscape sensitivity judgements reported in the LVIA. As stated previously, the Applicant acknowledges that localised landscape character inevitably varies to some degree within LCAs; however, neither published landscape character assessments nor the LVIA have drawn these areas out as being distinctly different at the scale assessed. This is therefore accepted as a matter of differing professional opinion.
3.5 Historic recognition of landscape value 3.5.1 The countryside of the Colne Valley west of Colchester has been consistently recognised through successive planning policy and evidence-base studies as a landscape of particular value and sensitivity. Historically, much of the area formed part of the Essex Structure Plan Special Landscape Areas (SLA) and was subsequently identified by Colchester Borough Council as Countryside Conservation Areas (CCAs).	The Applicant understands that identification of proposed Areas of Landscape Conservation Importance (ACLIs), formerly Countryside Conservation Areas (CCA) was made in work by Chris Blandford Associates in 2005. Whilst the information contained within the 2005 Chris Blandford study provides useful background information there is no such designation identified within the current local plan for Colchester City Council. The Applicant has undertaken a landscape value assessment as set out in response to ID 12.133 in 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030]. The Applicant notes that the TLP report broadly agrees with the value judgements presented in the LVIA. The exception to this

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3.5.2 Field survey, review of historic mapping and consideration of more recent evidence-base studies indicate that many of the landscape characteristics that contributed to the area's identification as a Special Landscape Area and Countryside Conservation Area remain evident today. 3.5.3 Although these designations no longer form part of the current planning framework, the studies that informed their designation provide evidence of the area's long-recognised landscape qualities. As such, they are a relevant consideration when understanding the evolution of landscape policy and the enduring characteristics that contribute to the area's value and sensitivity. 3.5.4 The continued relevance of these characteristics is reflected in more recent landscape character assessments, green infrastructure studies and local planning evidence, which continue to identify the Colne Valley as a distinctive and valued landscape within the wider Colchester area. Areas of Landscape Conservation Importance, 2005 3.5.5 In Colchester Borough Council's Review of Countryside Conservation Areas (RCCA), 2005, the existing CCAs were reassessed using landscape character assessment methodology and proposed as Areas of Landscape Conservation Importance (ALCIs). The review drew upon the findings of the Colchester Borough Landscape Character Assessment (2005). 3.5.6 The RCCA concluded that the River Valley Landscape Type, including the Colne Valley landscapes, was of High Value and worthy of conservation. The report states that: "The River Valley landscape type is also evaluated as high and considered to be worthy of conservation...". In support of this conclusion, the report noted that these landscapes exhibit strong surviving time-depth, a richness of natural and man-made landscape features, and provide important recreational corridors linking Colchester with the wider countryside. 3.5.7 The review further concluded that landscapes outside the Dedham Vale AONB (now National Landscape) assessed as being of "highest" or "high" value represented some of the most important landscapes within the Borough. These were identified as exhibiting strong visual and scenic qualities, significant nature conservation interest, tranquillity, cultural associations and distinctive landscape character. 3.5.8 As a consequence, the review recommended the designation of ALCIs as a replacement for the existing Countryside Conservation Areas. Figure 09 illustrates how the proposed ALCIs included a substantial area of the Colne Valley extending westwards from Colchester to the city boundary, together with land south of the Dedham Vale National Landscape. This demonstrates that recognition of landscape value extended across a broad area of the Colne Valley rather than being confined to isolated sites or features and provides further evidence of the longstanding recognition of the Colne Valley as a landscape of elevated value outside of the nationally designated landscape of the Dedham Vale. Neighbourhood Planning 3.5.9 Local recognition of landscape value has also been expressed through neighbourhood planning. A draft 2016 consultation version of the West Bergholt Neighbourhood Plan proposed an "Area of Special Landscape" covering countryside to the south-east and west of the village envelope. Although this designation did not form part of the final made Neighbourhood Plan (2019), its inclusion within the consultation draft provides evidence of local recognition of the landscape sensitivity, rural character and importance of the area. 3.7 Landscape Value (extracted paragraphs) 3.7.1 The N2T LVIA includes an assessment of landscape value for each of the Landscape Character Areas within the Area of Interest. The LVIA identifies Medium Value for the plateau landscapes (B2, B4, B5 and B6) and Medium-High Value for the Colne River Valley landscapes (A4 and A5). 3.7.2 Having regard to the landscape character assessments, environmental and heritage assets, historic recognition of landscape value and green infrastructure studies described above, The Landscape Partnership broadly agrees with the value judgements presented within the N2T LVIA.	relates to two small LLCAs identified by TLP (B5a Grove Tributary Valley LLCA and B2/B4 Roman River Corridor LLCA). The TLP review considers these LLCA to have medium-high value rather than the medium value assigned to the published LCA in the LVIA. This is a matter of differing professional opinion, and the Applicant stands by the assessment of landscape sensitivity and landscape effects as reported in the LVIA. It is considered that the level of detail provided in the LVIA is sufficient and proportionate, enabling the decision maker to understand the nature and level of effects. Whilst it would always be possible to add further detail, the purpose of LVIA (and EIA) is to provide a proportionate assessment and the Applicant considers this has been produced. In addition to the above the Applicant notes the areas identified by TLP as B5a Grove Tributary Valley LLCA and B2/B4 Roman River Corridor LLCA were not identified within areas proposed as ACLI in the 2005 Chris Blandford study.

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3.7.3 Notwithstanding the above, this review has identified two LLCAs that differ materially from the wider plateau landscapes within which they occur. These areas exhibit a combination of landscape, ecological, historic and perceptual characteristics that are not fully reflected within the broader LCAs. A more detailed assessment of landscape value has therefore been undertaken in accordance with the principles set out in TGN 02-21: Assessing Landscape Value Outside National Designations (ALVOND). 3.7.4 The LLCAs comprise B5a – Grove Tributary Valley and B2/B4 – Western Roman River Corridor, both of which are described above. 3.7.5 On balance, the B5a – Grove Tributary Valley is considered to be of Medium-high landscape value overall. 3.7.6 On balance, the B2/B4 – Roman River corridor is considered to be of Medium-high landscape value overall.	
3.8 Susceptibility to change 3.8.1 The N2T LVIA includes an assessment of each of the published LCAs within the Area of Interest susceptibility to change. Landscape susceptibility reflects the ability of a landscape to accommodate the specific type of development proposed without undue consequences for its key characteristics. 3.8.2 The Landscape Partnership broadly agrees with the susceptibility judgements presented for the LCAs; however, this review has identified two localised landscape character areas which are considered to exhibit characteristics that differ materially from the wider plateau landscapes within which they occur. As a result, a separate high-level appraisal of landscape susceptibility has been undertaken to reflect their specific sensitivities to the proposed development. 3.8.3 The two areas are B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor, both described in Section 3.1. 3.8.6 The B5a: Grove Tributary Valley exhibits a number of characteristics that are susceptible to the introduction of large-scale overhead line infrastructure, including its tributary valley landform, coherent landscape structure, historic settlement pattern and rural character. Other susceptibilities include opportunities for views of the new elements. The presence of watercourses, ponds, riparian vegetation and protected lanes further contributes to the area's susceptibility to change. Together, these characteristics provide a relatively limited capacity to accommodate large-scale vertical infrastructure without affecting the landscape's key characteristics and rural qualities. Consequently, the landscape is considered to have a High susceptibility to development of the type proposed. 3.8.8 The B2/B4: Roman River Corridor exhibits a number of characteristics that are susceptible to the introduction of large-scale overhead line infrastructure, including its intact landscape structure, strong historic character, tranquil rural setting and concentration of ecological and geological interests. Other susceptibilities include visual exposure associated with the valley landscape. The presence of Church House Wood Ancient Woodland, Marks Tey Brickpit SSSI and the Geological Conservation Review site further contributes to the susceptibility of the corridor to changes that could affect its distinctive character and landscape setting. Consequently, the landscape is considered to have a High susceptibility to the development of the type proposed. 3.9 Sensitivity 3.9.2 The Landscape Partnership broadly agrees with the landscape sensitivity judgements presented within the N2T LVIA for the published LCAs. 3.9.4 Both B5a -Grove Tributary Valley and B2/B4 – Roman River Corridor are considered to have High landscape sensitivity. The combination of Medium-High landscape value and High susceptibility reflects the presence of important ecological, geological, historic and perceptual characteristics together with a limited ability to accommodate large-scale overhead line infrastructure without affecting the qualities that define the landscape corridor.	The Applicant notes the TLP report broadly agrees with the landscape susceptibility and sensitivity judgements reported in the LVIA. The landscape assessment has been undertaken in a proportionate and consistent manner across the Study Area; reflective of the scale of the Project. The LVIA is based on recognised, published landscape character assessments. Landscape susceptibility and sensitivity will inevitably vary within LCAs, but the overall judgements remain fair and valid. The Applicant considers that the overall sensitivity judgements and resulting assessment conclusions remain robust and appropriate, and stands by the assessment of landscape susceptibility and sensitivity as reported in the LVIA.

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4 Landscape effects 4.1 High-level review of landscape effects – N2T LVIA 4.1.1 The reviewed N2T LVIA identifies the greatest landscape effects within the more visually sensitive valley landscapes associated with the Colne River corridor, namely LCA A4: Colne River Valley Floor and A5: Colne River Valley Slopes. Within these LCAs, the introduction of large-scale overhead line infrastructure and pylons is assessed as resulting in Major Significant effects within 0.5km of the infrastructure, reducing to Moderate Significant effects between 0.5km and 1.5km. 4.1.2 Within the plateau landscapes, including LCA B5: Rochford’s Farmland Plateau, B6: Great Horkesley Farmland Plateau, B4: Great Tey Farmland Plateau and B2: Easthorpe Farmland Plateau, the N2T LVIA identifies Moderate-Major Significant effects within 0.5km of pylons and overhead line infrastructure, reducing to Moderate Significant effects between 0.5km and 1.5km. An exception to this is B6 – Great Horkesley Farmland Plateau, where effects are identified as reducing below the threshold of Significant at distance beyond 0.5km of the proposed infrastructure. 4.1.3 The Landscape Partnership broadly agrees with these conclusions. 4.1.4 As set out at Chapter 3, this review identified two LLCAs that exhibit characteristics that differ materially from the wider plateau landscapes within which they occur... 4.1.5 The findings indicate that both B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor exhibit a level of sensitivity and subsequent likely Level of effect that is greater than identified for the wider plateau landscapes within which they occur. This reflects the combination of landscape, time-depth and cultural characteristics present within these LLCAs. 4.2 Schedule of findings The following schedule summarises the findings of the N2T LVIA in relation to the Area of Interest, supplemented with those for the refined LLCAs. The schedule presents the assessed Value, Susceptibility, Sensitivity and anticipated Level of effect within 0.5km and between 0.5km and 1.5km of the proposed overhead line infrastructure. 4.2.1 Tables 4.2 and 4.3 demonstrate that the LCAs within the Area of Interest along the proposed pylon corridor all are assessed as experiencing Moderate-Major effects or Major effects within 0.5km of the proposed infrastructure and that all these effects would be Significant. Effects between 0.5km and 1.5km are all judged to reduce to Moderate effects and to be Significant, with the exception of B6: Great Horkesley Farmland Plateau, where effects are identified as reducing below the threshold of Significant due to the proposed undergrounding in this area.	The Applicant notes the TLP report broadly agrees with the assessment of landscape effects reported in the LVIA. There is a slight difference in professional opinion in relation to two small LLCA identified by TLP (B5a Grove Tributary Valley LLCA and B2/B4 Roman River Corridor LLCA). These are subset areas within B2 Easthorpe Farmland Plateau LCA, B4 Great Tey Farmland Plateau and B5 Rochford’s Farmland Plateau LCA. The Applicant has identified moderate-major significant landscape effects within 0.5 km of the Project within B2 Easthorpe Farmland Plateau LCA, B4 Great Tey Farmland Plateau and B5 Rochford’s Farmland Plateau LCA. The TLP report considers effects within localised parts of these published LCAs (B5a Grove Tributary Valley LLCA and B2/B4 Roman River Corridor LLCA) to be major significant. This is a matter of differing professional opinion, and the Applicant stands by the assessment of landscape sensitivity and landscape effects as reported in the LVIA. Furthermore, effects judged to be moderate-major or major are all considered to be significant. Significant landscape effects are not unusual for a project of this nature as is recognised in NPS Policy. The Applicant notes that significant landscape effects are also reported elsewhere within the Study Area for the Project.
4.3 Additional landscape effects associated with vegetation loss 4.3.1 The landscape effects associated with the Development Proposal do not only arise from the introduction of pylons and overhead conductors, but also from the removal and management of vegetation required to facilitate construction and operation of the transmission corridor. 4.3.2 Trees, woodland, hedgerows and riparian vegetation form an important component of the landscape structure of the Area of Interest. These features contribute to enclosure, local distinctiveness, ecological connectivity and the perception of rural character. They are particularly evident within the Colne Valley, the Grove Tributary Valley and the Roman River Corridor, where vegetation is closely integrated with landform and settlement pattern. 4.3.3 The loss or alteration of vegetation therefore has the potential to contribute to landscape effects beyond the immediate footprint of the infrastructure itself. Whilst replacement planting may mitigate some effects over time, the removal of mature landscape features can result in a reduction in landscape structure and local distinctiveness for an extended period.	The Applicant has responded to concerns about vegetation loss previously in the following documents: • BIO 1.20 and LV 1.1 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] • REP1-305 in 8.5.5 Applicant’s Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028] • Reference 6.21, page 22 of 8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]
4.4 Summary 4.4.1 The review undertaken as part of this assessment demonstrates that the extent of sensitive landscape receptors affected by the proposed overhead line infrastructure may be greater than is	The Applicant has responded to the matters raised in this summary within above responses.

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reflected within the broad Landscape Character Areas used within the N2T LVIA. The identification of the B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor localised landscape character areas identify additional areas of elevated landscape sensitivity. 4.4.2 When considered alongside the Major Significant effects identified within the adjoining A4 – Colne River Valley Floor and A5 – Colne River Valley Slopes landscape character areas, the findings indicate a concentration of Significant landscape effects across a series of connected and sensitive landscapes.	
5 Visual context 5.1 Visual Receptors and Sensitivity 5.1.1 The N2T LVIA includes 22 viewpoints within the Area of Interest, representing a range of visual receptors including road users and recreational users. The Area of Interest contains an extensive network of footpaths, bridleways and Protected Lanes which provide views across the Colne Valley, adjoining plateau landscapes and the Roman River Corridor. As many of these routes are valued for their rural character, tranquillity and recreational function, users are likely to exhibit a high degree of awareness of changes to the surrounding landscape. 5.1.2 In addition to the viewpoints assessed within the N2T LVIA, The Landscape Partnership has identified a number of further viewpoints located along the Public Rights of Way network within the Area of Interest. Whilst not being exhaustive of all potential viewpoints, together, these viewpoints are considered to be representative of receptors likely to experience notable changes in visual amenity arising from the proposed development and are shown on Figure 14 below supported by panorama photos in Appendix 01. 5.1.3 The additional viewpoints include the following: • Viewpoint A: Fossetts Lane / PRow Fordham-16 • Viewpoint B: Bridleway 20 / PRow Aldham-18 • Viewpoint C: PRow Aldham-7 • Viewpoint D: PRow Aldham-3 Figure 15: Additional viewpoints	The Applicant notes the four additional viewpoints put forward in the TLP report are very close to the Project. The reported major adverse (significant) visual effects at these viewpoints accords with the LVIA judgements in the relevant Visual Receptor Area (VRA). The VRA assessment considers people living and moving around the local community and people walking along PRow.
5.2 Sensitivity 5.2.1 Visual sensitivity reflects the relationship between the value place on a view by a visual receptor (person) and the susceptibility of the view change of the type proposed. Receptors of higher value and/or higher susceptibility are generally considered to be more sensitive to the effects of development. 5.2.2 A review of the N2T LVIA indicates that all the visual receptors within the Area of Interest are assessed as being of Medium or High sensitivity. The Landscape Partnership broadly agrees with these sensitivity judgements. 5.2.3 For the purposes of this review, a separate high-level assessment of visual sensitivity has been undertaken for the additional viewpoints. As noted above, these additional viewpoints are located on Public Rights of Way and Protected Lanes not specifically represented by the N2T LVIA viewpoints and are considered representative of recreational receptors likely to experience close-range views of the proposed infrastructure.	The Applicant notes that the TLP report broadly agrees with the visual sensitivity judgements presented in the LVIA. As stated above the reported major adverse (significant) visual effects at the four additional viewpoints put forward in the TLP report accords with the LVIA judgements in the relevant VRA. The VRA assessment considers people living and moving around the local community and people walking along PRow.
6 Visual effects 6.1 High-level review of visual effects – N2T LVIA 6.1.1 Of the 22 viewpoints located within the Area of Interest, the N2T LVIA identifies Significant residual visual effects at 16 of the viewpoints at year 15. The Significant effects range from Moderate to Major Adverse and are generally associated with viewpoints located within 1.5km of the proposed overhead line.	The Applicant notes the TLP report broadly agrees with the visual assessment conclusions presented in the LVIA. The Applicant wishes to confirm, as stated in previous responses, the visual assessment does not rely on viewpoints alone. The four additional viewpoints in the TLP report back up the findings of the VRA assessment as the viewpoints are all within 0.5 km of the Project. Significant visual effects are relatively contained in the Colne River Valley as explained in the above responses.

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6.1.2 The six viewpoints assessed as not being Significant are either located at greater distances from the proposed development (VPs 4.07, 4.10, 4.13, 4.28, 4.35 and 4.38) or benefit from substantial screening by intervening vegetation, built form and/or landform (VPs 4.33, 4.28 and 4.35). that the findings indicate that Significant visual effects may occur across a substantial proportion of the Area of Interest and are not confined to a small number of isolated viewpoints. 6.1.3 The Landscape Partnership broadly agrees with the visual assessment conclusions presented within the N2T LVIA. However, in a limited number of cases, The Landscape Partnership considers that the magnitude of visual effects may be greater than those identified within the N2T LVIA. These differences are generally limited in extent and may reflect differences in professional judgement rather than fundamental disagreement regarding the nature of the effects.	
6.2 Additional viewpoints – potential visual effects 6.2.1 The additional viewpoints identified through this appraisal are listed below with a high-level indicative professional judgement of potential visual effects, with accompanying panoramic photographs to illustrate the composition of the view attached at Appendix 02. Table 6.1: Summary of visual effects - LLCA Effect: Major adverse Significant 6.2.2 On the basis of this high-level review, the additional viewpoints are considered to have the potential to experience Significant adverse visual effects arising from the proposed development. This is consistent with the findings of the N2T LVIA, which identifies Significant visual effects across a substantial proportion of the Area of Interest. 6.2.3 Figure 15 illustrates the distribution of visual effects identified within the N2T LVIA across the Area of Interest, together with the high-level indications of visual effect for the additional viewpoints identified through this appraisal. 6.2.4 The findings indicate that opportunities for close-range views of the proposed infrastructure are not limited to the representative viewpoints assessed within the N2T LVIA. Additional Public Rights of Way and Protected Lanes within the Area of Interest are also likely to experience notable changes in visual amenity, reinforcing the extent of visual effects identified across the Colne Valley landscape.	The potential for significant effects is to be expected from the introduction of 400 kV overhead lines, especially in terms of effects on close-range views. As explained in the above responses, significant visual effects are typically contained within 1.5 km of the Project.
7 Review of undergrounding proposals along the Norwich to Tilbury route 7.2 Waveney Valley Alternative 7.2.1 The Norwich to Tilbury Design Development Report, 2024 identified the Waveney Valley as a location where, notwithstanding the absence of a nationally designated landscape, the combination of potential landscape, heritage and recreational effects warranted further consideration of undergrounding in accordance with NPS EN-5. 7.2.2 The report noted: “Whilst the Waveney Valley is not a nationally designated landscape as set out in NPS EN-5 paragraph 2.9.20, the area was formerly identified (in the local plan) as a Special Landscape Area. Effects would arise from new infrastructure in the landscape. In addition, the setting of a Grade I listed building (St Remegius Church) extends from the edge of Roydon across the valley to the agricultural hinterland and would be affected by a new overhead line. There would also be effects on an undesignated moat. The valley, including the adjacent SSSI are used extensively for recreation with a long-distance path the Angles Way (established by the Ramblers Association), crossed by the 2023 preferred draft alignment adjacent to RG087.” 7.2.3 Subsequently, National Grid developed the Waveney Valley Alternative (WVA), comprising an approximately 2km section of underground cable through the Waveney Valley near Diss, together with associated cable sealing end compounds at either end of the underground section. The alternative was subject to statutory consultation and environmental assessment. 7.2.4 Although the WVA was not subsequently incorporated into the final Development Consent Order application, it demonstrates that National Grid considered the potential use of undergrounding within a	Responding to the comments across 7.2 and 7.3, the Applicant’s position is that there is nothing inconsistent in its approach to consideration of the Stour Valley, the Waveney Valley and the Colne Valley. The proposal to underground the Project within the Stour Valley in Dedham Vale National Landscape accords with EN-5. This is because the presumption of overhead line is reversed within National Landscapes as acknowledged in paragraph 1.3.1 of the TLP report. The Stour Valley is therefore not directly comparable to the Waveney and Colne Valleys. Prior to the Statutory consultation that considered the Waveney the Applicant had considered the whole Project route. The Applicant considered locations on a case by case basis against the test in 2.9.23 of NPS EN-5. Whilst no location was considered to clearly meet the test, the effects at the Waveney were considered on the basis of responding to effects on the Grade I Sain Remigius to have the potential to justify a change of technology and were considered out of an abundance of caution. In conclusion the landscape and visual effects were not considered to meet the criteria in isolation, but in combination with the potential effects on the Grade I church of St Remigius were such that it was considered worthy of further consideration. The effects at other valleys (such as the Colne) did not have this combination. The Applicant recognises the local value of the Colne Valley and the fact that local designations have previously covered parts of the valley. Despite being valued locally the Applicant does not consider this landscape to warrant consideration of an underground cable solution in Policy terms as explained above. Even if others took a different view, as stated above, the Applicant does not consider the further tests pursuant to 2.9.24 and 2.9.25 of EN-5 would be met in order to justify an underground alternative, that would consider the level of cost to be justified (based on scaling the cost from the previously

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landscape that was not nationally designated. but which still displayed sensitive attributes. In doing so, National Grid identified a combination of landscape, heritage, recreational and ecological considerations as relevant to the application of NPS EN-5 §2.9.26. 7.2.5 Whilst the Colne Valley and Roman River corridor differ in character from the Waveney Valley, similar categories of consideration are present in these areas, including former Special Landscape Area recognition (later proposed for redefinition as Proposed Areas of Landscape Conservation Importance), significant landscape effects, heritage interests, promoted recreational routes and strategic ecological and green infrastructure functions.	estimated approximately £70 million from the Waveney Valley Alternative). Further detail is provided in our response above against the topic ‘Policy context’
7.3 Stour Valley 7.3.1 The Stour Valley underground cable section provides a useful example of a location where National Grid has adopted undergrounding as part of the proposed Norwich to Tilbury route. A review of the landscape character areas affected by this section provides an opportunity to consider whether similar characteristics and indicators of landscape sensitivity are present elsewhere along the route, including within the Colne Valley and Roman River corridor. 7.3.2 The findings of the N2T LVIA for the Stour Valley underground cable section and the Colne Valley and Roman River Valley overhead line section are summarised in Table 7.1 below. 7.3.3 The landscape value ratings presented in the table have been taken directly from the value assessment tables contained within Document 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment, with the exception of B5a: Grove Tributary Valley and B2/B4: Roman River Corridor, for which the value ratings are derived from the appraisal presented in Section of this report. 7.3.4 Landscape susceptibility has not been included within this comparison, as it is intrinsically linked to the nature of the proposed development and consequently is not directly comparable between landscape character areas subject to overhead line infrastructure and those subject to underground cabling. 7.3.5 As landscape sensitivity is derived from a combination of landscape value and susceptibility, sensitivity ratings have likewise been excluded from the comparison. The analysis therefore focuses on landscape value and other indicators of landscape importance, including designations, planning policy recognition and strategic green infrastructure functions, which provide a more consistent basis for comparing the landscape character areas affected by the different forms of infrastructure. Table 7.1: Summary of landscape value comparisons 7.3.6 Table 7.1 indicates that National Grid has adopted underground cabling within landscape character areas assessed in the N2T LVIA as being of Medium and Medium-High landscape value. The use of undergrounding within the Stour Valley is therefore not confined solely to landscapes assessed as having the highest landscape value ratings. 7.3.7 Table 7.1 demonstrates that the landscape character areas associated with the Stour Valley underground cable section comprise a range of landscape value ratings, including both Medium and Medium-High value landscapes. The areas subject to underground cabling are therefore not exclusively those assessed as having the highest landscape value within the N2T LVIA. 7.3.8 The table also shows that the Colne Valley and Roman River Valley landscape character areas affected by the proposed overhead line are similarly identified as Medium or Medium-High value landscapes. In addition, these areas are associated with a range of landscape policy recognitions, including proposed Areas of Landscape Conservation Importance and strategic Green Infrastructure corridors identified within local and sub-regional planning frameworks. 7.3.9 The comparison indicates that landscape value alone does not appear to explain the differing approaches adopted within the Stour Valley and the Colne Valley/Roman River Valley sections. Landscapes assessed as being of Medium or Medium-High value occur within both the underground cable and overhead line sections of the route.	

Matter	NG Response
7.3.10 While the Stour Valley benefits from the additional protection afforded by the Dedham Vale National Landscape designation, both Table 7.1 and the analysis presented in Section 3 demonstrate that the Colne Valley and Roman River Valley are not undesignated or unrecognised landscapes. Rather, they have been consistently identified through landscape studies, planning policy and green infrastructure strategies as landscapes of particular importance that contribute to wider environmental, recreational and ecological objectives and have been consistently identified as strategic landscape corridors.	
8 Analysis against EN-5: potential for widespread and significant landscape and visual effects 8.1 Introduction 8.1.1 This section draws together the findings of the appraisal and considers their implications in relation to the policy tests set out in National Policy Statement for Electricity Networks Infrastructure (EN-5). In particular, it considers whether the proposed overhead transmission infrastructure within the Area of Interest has the potential to give rise to widespread and significant adverse landscape and/or visual effects such that further consideration of feasible alternatives, including route refinement and localised undergrounding, may be warranted. 8.1.2 EN-5 establishes a strong starting presumption in favour of overhead lines for electricity transmission infrastructure. However, it also recognises that, away from nationally designated landscapes, locations may arise where there is a high potential for widespread and significant adverse landscape and/or visual impacts. In such circumstances, EN-5 indicates that the Secretary of State should be satisfied that evidence has been provided to support a decision on whether undergrounding is or is not appropriate, assessed on a case-by-case basis. 8.1.3 This appraisal does not seek to determine whether undergrounding should occur. Rather, it provides an evidence base to inform consideration of whether the circumstances described in EN-5 may arise within the Colne Valley and Roman River corridor.	Please refer to the Applicant’s responses to similar matters above.
8.2 Landscape character and sensitivity 8.2.1 The appraisal identifies the Area of Interest as comprising a connected series of valley, tributary valley and adjoining plateau landscapes west of Colchester. These landscapes contain a distinctive combination of river valleys, tributary valleys, rolling farmland, woodland, historic field patterns, historic settlements, rural lanes, Public Rights of Way and ecological assets. 8.2.2 The N2T LVIA identifies Medium-High landscape value and High sensitivity for the principal Colne Valley landscapes, namely A4 – Colne River Valley Floor and A5 – Colne River Valley Slopes. This appraisal broadly agrees with those judgements. 8.2.3 The review has also identified two localised landscape character areas, B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor, which are considered to exhibit characteristics that differ materially from the wider plateau landscapes within which they occur. These areas contain concentrations of ecological, historic, cultural and perceptual characteristics which contribute to elevated landscape sensitivity. 8.2.4 As a result, High landscape sensitivity is identified across A4 – Colne River Valley Floor, A5 – Colne River Valley Slopes, B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor. These areas are not isolated landscape pockets, but form part of a connected landscape framework extending through the Colne Valley and Roman River corridor.	Please refer to the Applicant’s responses to similar matters above.
8.3 Landscape effects 8.3.1 The review of the N2T LVIA indicates that the greatest landscape effects within the Area of Interest are associated with the visually sensitive valley landscapes of the Colne River corridor. Major Significant effects are identified within 0.5 km of the infrastructure within A4 – Colne River Valley Floor and A5 – Colne River Valley Slopes, reducing to Moderate Significant effects between 0.5 km and 1.5 km.	The Applicant has responded to concerns raised relating to landscape and visual effects, including consideration of whether there would be widespread effects, in the responses above. The Applicant recognises there will be significant effects on landscape and visual receptors at locations along the length of the Project, including the Colne Valley, and extending to typically 1.5 km from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on landscape character and visual receptors will affect

Matter	NG Response
8.3.2 Significant landscape effects are also identified within the adjoining plateau landscapes. In addition, this appraisal indicates that the locally distinctive B5a – Grove Tributary Valley and B2/B4 – Roman River Corridor have the potential to experience significant landscape effects arising from the introduction of large-scale overhead transmission infrastructure. 8.3.3 Taken together, the findings indicate the potential for significant landscape effects across a series of connected and sensitive landscapes within the Area of Interest. These effects would extend across both the principal Colne Valley landscapes and locally distinctive tributary and river corridor landscapes, rather than being confined to a single isolated landscape receptor. 8.4 Visual amenity 8.4.1 The N2T LVIA includes 22 viewpoints within the Area of Interest, representing a range of receptors including road users and recreational users. Of these, Significant visual effects are identified at a substantial proportion of viewpoints within the Area of Interest. 8.4.2 The Area of Interest also contains an extensive network of Public Rights of Way, bridleways, Protected Lanes and recreational routes, including routes which provide views across the Colne Valley, adjoining plateau landscapes and Roman River Corridor. Users of these routes are likely to have a high degree of awareness of changes to the surrounding landscape, particularly where routes are valued for their rural character, tranquillity and recreational function. 8.4.3 The additional viewpoints reviewed as part of this appraisal indicate that opportunities for close-range views of the proposed infrastructure are not limited to the representative viewpoints assessed within the N2T LVIA. Additional Public Rights of Way and Protected Lanes within the Area of Interest also have the potential to experience notable and significant changes in visual amenity. 8.4.4 The findings therefore indicate the potential for widespread and significant adverse visual effects across the Area of Interest, affecting walkers, recreational users, road users and local communities. Significant visual effects would not be confined to a small number of isolated viewpoints but would be experienced across a wider network of routes and receptors within the Colne Valley and Roman River corridor.	a sequence of places and people along the length of the line. The effects are described in relation to each of the assessment units (LCTs and VRAs). Effects will not typically be experienced as a whole, but the total effect on landscape character and visual receptors can be understood from the LVIA, by looking at all its component parts, each of which is set out in detail. It is noted that there will be significant effects, as would be expected for any project of this size and nature.
8.5 Recognition of landscape value 8.5.1 The Colne Valley west of Colchester has been recognised through successive landscape studies, planning policy documents, green infrastructure strategies and local planning evidence as a landscape of particular value. Historic recognition through Special Landscape Areas and Countryside Conservation Areas is no longer part of the current planning framework, but the studies that informed those designations provide evidence of the area’s long-recognised landscape qualities. 8.5.2 More recent evidence, including landscape character assessments, green infrastructure strategies, neighbourhood planning and emerging local plan policy, continues to identify the Colne Valley and Roman River corridor as important landscape and green infrastructure resources. These studies recognise their contribution to ecological connectivity, recreation, nature recovery, landscape character and access to the countryside. 8.5.3 This evidence supports the conclusion that the Area of Interest should not be regarded as an ordinary undesignated landscape without recognised value. Rather, it comprises a connected landscape corridor whose qualities have been repeatedly identified through local and sub-regional evidence.	The Applicant recognises the local value of the Colne Valley and the fact that local designations have previously covered parts of the valley. Despite being valued locally the Applicant does not consider this landscape to warrant consideration of an underground cable solution in Policy terms as explained above.
8.6 Comparison with other sections of the Norwich to Tilbury route 8.6.1 Review of other sections of the Norwich to Tilbury route indicates that National Grid has considered or adopted undergrounding in circumstances where a range of landscape, heritage, recreational and environmental factors are present. The Waveney Valley Alternative is relevant because undergrounding was considered in a landscape that was not nationally designated but which displayed a combination of sensitive attributes.	Please refer to the Applicant’s responses to similar matters above.

Matter	NG Response
8.6.2 The Stour Valley underground cable section also demonstrates that undergrounding has been adopted within landscape character areas assessed in the N2T LVIA as being of Medium and Medium-High landscape value. The use of undergrounding within the Stour Valley is therefore not confined solely to landscapes assessed as having the highest landscape value ratings. 8.6.3 The comparison is not intended to suggest direct equivalence with the Stour Valley or Dedham Vale National Landscape, but rather to illustrate the range of factors that have informed routeing and undergrounding decisions elsewhere on the scheme. The Dedham Vale National Landscape designation remains an important distinction in relation to the Stour Valley. However, the comparison indicates that landscape value alone does not appear to explain the differing approaches adopted along the route, and that National Grid has had regard to a wider combination of landscape, heritage, recreational and environmental considerations. 8.6.4 Similar categories of consideration are present within the Colne Valley and Roman River corridor, including recognised landscape value, significant landscape effects, heritage interests, promoted recreational routes, ecological assets and strategic green infrastructure functions.	
8.7 Overall analysis against EN-5 8.7.1 EN-5 recognises that, away from nationally designated landscapes, there may be locations where a high potential for widespread and significant adverse landscape and/or visual impacts may justify consideration of undergrounding or other feasible alternatives. The policy requires such matters to be considered on a case-by-case basis, weighing the relevant landscape, visual, environmental, technical and cost considerations. 8.7.2 The findings of this appraisal indicate that the Area of Interest contains a concentration of sensitive landscape and visual receptors. High landscape sensitivity is identified across the principal Colne Valley landscapes and within locally distinctive tributary and river corridor landscapes. Significant landscape effects are identified across a series of connected landscape character areas, and significant visual effects are identified across a substantial network of viewpoints, Public Rights of Way, Protected Lanes and recreational routes. 8.7.3 The evidence also demonstrates that the Colne Valley and Roman River corridor have been consistently recognised through landscape studies, planning policy documents, green infrastructure strategies and emerging local policy as valued and multifunctional landscape corridors. These characteristics contribute to the sensitivity of the Area of Interest and to the potential extent of adverse effects arising from the introduction of large-scale overhead transmission infrastructure. 8.7.4 Taken together, the findings indicate that the proposed overhead line has the potential to give rise to widespread and significant adverse landscape and visual effects within the Area of Interest. On this basis, there is a reasonable evidential basis for further consideration of feasible alternatives, including route refinement and localised undergrounding, in accordance with the provisions of EN-5. 8.7.5 This conclusion does not determine that undergrounding should be selected. Other matters, including engineering feasibility, cost, construction impacts, environmental effects and the effects of undergrounding itself, would need to be assessed by the applicant and considered by the Secretary of State. However, from a landscape and visual perspective, the appraisal indicates that the Colne Valley and Roman River corridor exhibits the type of circumstances in which EN-5 anticipates that further consideration of alternatives may be appropriate. 8.7.6 Taken together, the findings indicate the potential for widespread and significant adverse visual effects across the Area of Interest, affecting a range of visual receptors including walkers, recreational users, road users and local communities. The findings are therefore relevant to the considerations set out within paragraphs 2.9.24 and 2.11.6 of EN-5, which recognise that locations with a high potential for widespread and significant adverse landscape and/or visual impacts may warrant consideration of alternatives, including undergrounding.	Please refer to 8.5.12 Applicant’s Written Summary of Oral submissions and Responses to Action Points for Issue Specific Hearing 4 together with the Applicant’s responses to similar matters above.

Table D.3 Applicant’s Comments to Pylons East Anglia Appendix D - Landscape Partnership Report [REP5-277]

Appendix Di Appendix 01: Photographs	Applicant Comment
Viewpoint A; Fossetts Lane / PRoW Fordham-16	Noted
Viewpoint B; Bridleway 20 / PRoW Aldham-18	Noted
Viewpoint C; PRoW Aldham-7	Noted
Viewpoint D; PRoW Aldham-3	Noted

Appendix D3

Applicant's Response to Pylons East Anglia Charles Banner KC opinion

Appendix D3.

Applicant's Response to Pylons East Anglia

Charles Banner KC opinion

Norwich to Tilbury

Opinion

Deadline 6 - Response to Legal Submissions of PEAL made at Deadline 5.

1. PEAL has made further submissions in relation to this application [REP5-264] [REP5-265].
2. It raises, through an opinion by Charles Banner KC, points on: a. the operation of the Critical National Priority presumption contained in National Policy Statements; b. the “objective” of the project; and c. the relevance of the most recent suite of policy documents and their role in the determination overall.
3. None of these matters are new points.
4. They have all been dealt with comprehensively previously including in opinions which were before the Inspectorate (and its lawyers) at the Adequacy of Consultation Stage [APP-079] and in legal submissions in response to ExA questions 1. [REP4-300].
5. This opinion does not seek to repeat these opinions but summarises the Applicant’s response in the context of the new submissions.

What is the CNP and what is the infrastructure that is critically needed.

6. The ExA will by now be familiar with the operation of the Critical National Priority policy and presumption.
7. Para 4.2.4 concludes that “there is a Critical National Priority (CNP) for the provision of nationally significant low carbon infrastructure”.
8. Para 4.2.5 defines what is low carbon infrastructure “for the purposes of this policy”. There is no need to look for any other definition.
9. Para 4.2.5 bullet 2 provides that for electricity grid infrastructure “all power lines in scope of EN5 including network reinforcement and upgrade works and associated infrastructure such as substations are nationally significant low carbon infrastructure” for the purposes of the policy.
10. So important is the need for such power line infrastructure that the Statement provides that “**[this] is not limited to those associated specifically with a particular generation technology as ALL new grid projects will contribute towards greater efficiency in constructing and connecting low carbon infrastructure to the National Electricity Transmission System.**”

11. Of course, in the present case, the proposal IS associated with low carbon wind generation stations and IS ALSO contributing to greater efficiency in the system which at present is over capacity.
12. Clearly, therefore the project consists of power-lines and associated infrastructure in scope of EN-5 and is on any view 'nationally significant low carbon infrastructure' for which provision, by definition, there is a critical national priority. The CNP policy is therefore engaged.

How does CNP policy work.

13. Para 4.2.8 makes it clear that CNP policy will influence how non HRA and MCZ residual impacts are considered in the planning balance. It creates a "presumption of consent".
14. Para 4.2.15 sets out the nature of the presumption. It provides that where residual non HRA or non MCZ impacts remain after the mitigation hierarchy has been applied, (**Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated**) then **these** residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. (Note it is the residual impacts which are required to be avoided reduced or mitigated).
15. Then the paragraph states that "in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of **these** residual impacts". The exception to this presumption of consent is impacts which give rise to **unacceptable risk to human health or defence**, irreplaceable habitats or risk to achievement of net zero. This is the CNP presumption of consent. It will only be rebutted in the most exceptional of circumstances.
16. In the present case none of the exceptions to the operation of the presumption apply to the infrastructure proposed by the application.
17. There is no prospect of unacceptable risk to human health from aviation for the reasons set out in the Applicant's submissions in that part of the case.
18. In summary, on the evidence, the Applicant has established that at all but one aerodrome safe flying can proceed. At the single aerodrome alternative and safe operational modifications can be adopted in line with EN-1. In any event for a licenced aerodrome the CAA will not authorise an unacceptably dangerous position in aviation terms and for unlicenced aerodromes an operator and pilot would be in breach of the Rules of the Air if they genuinely took the view that a risk was unacceptable in terms of human health. As a result, the exception relating to human health will not arise and this is secured by alternative statutory provisions.

19. In terms of unacceptable risk to defence interests, this exception is not engaged either as confirmed by the MoD DIO in its conditional acceptance that its objection on such grounds can be conditionally withdrawn (see statement of MoD DIO at ISH4)
20. The strength of the Critical Infrastructure presumption of consent is highlighted by paragraph 4.2.16 which makes it clear that if the exceptions don't apply, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs or any other planning policy, which requires a clear outweighing of harm exceptionality or very special circumstances.
21. This is an extraordinarily powerful presumption. And it is meant to be. It requires the decision maker as a starting point to find for example that development in the Green Belt meets the very special circumstances test and even the test of exceptionality or wholly exceptionality which applies where substantial harm to or even total loss of significance of highly designated heritage asset is occasioned.
22. This "setting aside" or outweighing of these very high policy and statutory protections are considered to be justified in the public interest in the particular circumstances of the Critical National Priority presumption of consent.
23. For the reasons set out above and in the other opinions, the presumption in favour of consent is thus engaged in the circumstances of the infrastructure being considered in the circumstances of the present case.
24. The PEAL submissions invent a concept of "presumed need" when describing the operation of EN-1 (see paragraph 4 of the most recent Opinion). There is no such concept in EN-1.
25. EN-1 identifies an unambiguous, real pressing and urgent need for electricity infrastructure of the type described in para 4.2.5.
26. There is no presumed need. What there is, is a requirement (emboldened in 3.2.6) on the decision maker to assess applications on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent as described for each of them in Part 3 of EN-1(2023).
27. So, the need is real, urgent and **MUST** be accepted by the decision maker to have been demonstrated.
28. EN-5 which deals with Electricity Networks identified by the provisions of the Planning Act 2008 then creates a strong presumption that such infrastructure should be provided by way of overhead line, a position which it states would be consistent with the duties of the Applicant under the provisions of the Electricity

Act and in particular Schedule 9 of the Electricity Act 1989. (2.9.7 /8 and 2.9.20 EN-5)) and which is only reversed IN nationally designated landscapes.

29. In this case this part of the policy clearly provides unambiguous guidance for the “particular means” of meeting needs identified in EN-1.

30. The proposal in the present case is therefore CNP infrastructure. It engages the CNP policy and as an electrical network applies the strong presumption for overhead lines outside of Nationally Designated landscapes and the strong presumption for undergrounding in the relevant designated landscape. It has considered whether the strong presumption has been rebutted away from designated national landscapes and has concluded that it has not and has provided evidence in support of that conclusion.

31. In this respect the Applicant’s approach is on all fours with the main CNP provisions of EN-1 properly understood.

Objectives and alternatives.

32. The PEAL submissions re-rehearse the arguments made previously about the potential alternatives to the project and their relationship to what are called the scheme objective or objectives.

33. These submissions are fully dealt with in my opinion of August 2025 where I set out the statutory requirements and associated guidance for nationally significant infrastructure projects.

34. Neither the statutory provisions nor the guidance require the identification of a scheme objective or objectives in the fashion argued for by PEAL. PEAL seeks to give the concept of objective a type of term of art requirement which simply does not exist in the statutory code for NSIP applications.

35. The need for electricity infrastructure generally and the particular need for very significant and urgent infrastructure to strengthen the network in and around East Anglia as well as to assist in meeting the governments aims and commitments re net zero are all identified in EN-1 (and are taken to have been proven by the decision maker).

36. The Application proposal meets all of these and other needs such as the Applicant’s statutory duties to provide economic and efficient electricity and these are all set out in the suite of application documents.

37. The objectives of the proposal reflect these identified needs and are multifarious and wide ranging. The fact that the Applicant does not choose to adopt PEAL’s approach to the “objectives” of the Project does not mean that it is unable to articulate what the objectives are as alleged by PEAL.

38. As to alternatives and the extent to which they are required to be considered by a decision maker, there is statutory guidance which must be taken into account by the decision-maker- s 50 Guidance (*Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects – Guidance on the pre-application stage for Nationally Significant Infrastructure Projects*). It provides at para 15 that:

“There are particular occasions in the NSIP consenting process where alternatives to the proposed development must be examined as required by legislation. For example, to meet the requirements of the EIA Regulations.”

39. This element of the guidance was followed and is to be found at 6.3 Environmental Statement Chapter 3 – Alternatives (Final Issue A) [APP-127]

40. The Guidance then states that:

“However, this does not extend to the preparation or examination of the application for development consent as a whole. There is no general requirement to consider alternatives for specific applications. The decision to make an Order granting development consent for an application is based on its own merits, not that there may be better or different alternatives either elsewhere or at a later stage.

...

That said applicants do now routinely set out in brief the main alternatives to their preferred scheme which were considered early during the pre-application stage and the consultees’ response to them. Applicants are encouraged to do so as this can demonstrate how project designs have been refined to take into account environmental, socio-economic and community effects. Any such consideration of alternatives should be submitted as part of the Application, perhaps as part of the Planning Statement. All this will help reinforce the applicant’s case for promoting the NSIP in the particular form of the submitted application.” (emphasis added).

41. That is the approach which the Applicant has taken in the circumstances of this case (and more- its consideration of the alternatives considered is more than “brief”.) The alleged alternatives suggested as part of PEAL’s submissions were fully considered as part of what is required by the pre application process set out the Planning Act 2008 and are clearly evidenced in the application papers.

42. Notwithstanding the provisions set out above and significantly in advance of the application stage, the Applicant has for example explained its strategic decision not to prefer offshore cabling or significantly wider undergrounding and has actively and transparently engaged with the public and PEAL on such matters.

43. The ability of these potential alternatives to meet the range of needs identified in EN-1 as well as the Applicant's duties under the Electricity Act was clearly a material consideration in this analysis. But these documents need to be read as a whole and in context.
44. This is the approach adopted by the Applicant and which was found adequate by the Inspectorate as part of the Adequacy of Consultation process.
45. The Applicant fails to see how the matters raised now on alternatives and objectives alter that conclusion or are now relevant to the task facing the Examining Authority.

The new EN suite.

46. The final line of argument seeks to place a gloss on the advice contained within the new suite of NPS documents to the effect that their contents cannot ever be determinative.
47. If that had been the case, then of course the new suite of documents would have included that caveat. It doesn't because it is not correct.
48. The ExA have already correctly indicated that on some matters the new EN-1 and EN-5 in particular are important and weighty indications of current government policy.
49. PEAL assert that compliance with the provisions of EN-1 2025 can never be determinative. It is no part of the Applicant's case that any single or combination of provisions of EN-1 is determinative- so the matter is moot. But the PEAL "gloss" on the weight to be given to the new suite and the suggestion that as a matter of law the provisions of EN -1 cannot be determinative is simply incorrect.
50. Thus and as but an example, if a provision of the new EN-1 meant that greater weight was given to a benefit in the overall planning balance exercise required by the legacy EN-1 then, there would be nothing to stop that extra weight being a material consideration and being important or even determinative in the balancing exercise required by the legacy National Planning Statement.

Russell Harris KC

Landmark Chambers July 2026

Appendix E

Applicant's Response to Table 9 of Suffolk County Council Deadline 5 Submission [REP5- 270]

Appendix E Applicant’s Response to Table 9 of Suffolk County Council Deadline 5 Submission [REP5-270]

2.1.8 Table E.1 provides the Applicant’s response to ‘Table 9: 8.4.9 (A) Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]’ of the Suffolk County Council (SCC) Deadline 5 submission [REP5-270].

Table E.1 Applicant response to Table 9 of REP5-270

Matter with Applicant’s Previous Comment [REP4-298]	Suffolk County Council’s Comment [REP5-270]	Applicant’s Comment
2.5 Table 6.1 (GG08) The Applicant acknowledges the council’s comments and, as stated in the Applicant’s response to questions HE 1.45 and HE 1.46 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074], an updated Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) will be submitted to the ExA at Deadline 5 – after having been shared with stakeholders for review, including Suffolk County Council, other Local Planning Authority Archaeological Advisors and Historic England – with the intention of securing agreement to avoid delays in the discharge of Requirements. The Applicant has already set out in meetings (and in the examination responses) that a revised version will be provided for stakeholder review by Deadline 4 and will be agreed with the Local Planning Authority Archaeological Advisors and Historic England to ensure a timely, deliverable programme for evaluation and mitigation. It is not the Applicant’s intention to produce a Historic Environment Management Plan (HEMP) separate from the AMS-OWSI. Measures for the protection and preservation of archaeological and heritage assets during construction are contained within 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], 7.2 Outline Code of Construction Practice [Revision D] and Requirement 5 (Archaeology) of 3.1 Draft Development Consent Order [Revision D]. Beyond the construction phase and the completion of archaeological excavation and recording there are no ongoing impacts to archaeological remains and no heritage assets that will remain within the land retained by the Applicant. Therefore the Applicant will not produce a standalone Historic Environment Management Plan.	The CoCP is not an appropriate mechanism to secure preservation in situ because it does not provide for post-construction, operational or decommissioning phases. National Grid must therefore reference the production of an Historic Environment Management Plan as part of the OAMS-OWSI to detail how preservation in situ of heritage assets will be achieved. It is necessary that an Historic Environment Management Plan is produced in addition to the OAMS-OWSI to accommodate the discovery of heritage assets during the evaluation and construction phases which are chosen to be preserved in situ. As a minimum, the Historic Environment Management Plan should set out that National Grid will record the location of heritage assets which have been preserved in situ, and that any National Grid works required in these preservation in situ areas will elicit a programme of archaeological mitigation where heritage assets are impacted.	The Applicant acknowledges the comments regarding the use of an Historic Environment Management Plan and the approach to preservation in situ. These matters have previously been considered and addressed in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], and through the updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in those submissions.
2.7 Table 6.1 (GH11) The Applicant acknowledges the council’s concern and confirms that the wording of GH11 will be revised for inclusion within a future iteration of 7.2 Outline Code of Construction Plan to make specific reference to sensitive archaeological deposits as a receptor to be considered within the Risk Assessment to be undertaken and to include reference to Historic England as a relevant stakeholder.	Can the applicant confirm that the Hydrological risk assessment for crossing locations will include assessment of hydrology of superficial deposits and impacts on archaeological and palaeoenvironmental remains?	The Applicant updated commitment GH11 of 7.2 Outline Code of Construction Practice [Revision F] at Deadline 5, which now commits that the Hydrogeological Risk Assessments will include sensitive archaeological deposits as receptors and also secures that the nature and scope of any mitigation for impacts will be agreed with appropriate stakeholders, including Historic England.

Matter with Applicant’s Previous Comment [REP4-298]	Suffolk County Council’s Comment [REP5-270]	Applicant’s Comment
2.8 Table 6.1 (H03) The Applicant acknowledges the council’s comments and notes that commitment H03 in 7.2 Outline Code of Construction Practice [Revision D] discusses measures to avoid unintentional damage to known archaeological remains or to areas where archaeological investigations will take place. Also, GG04, GG05 and GG08 detail mitigation measures and environmental commitments which will be put in place for the duration of the works. The Applicant currently envisages that a digital Environment Management Plan would be produced by the Project’s delivery partner, alongside the use of a geographic information system as a compliance tool. This would support the Clerk of Works, for example by clearly identifying constraints and no-go areas such as nesting bird locations, relevant buffers and offsets, and mitigation areas.	Archaeology needs to be part of this to cover areas of trial trenching, areas for archaeological mitigation and any areas which are chosen for preservation in situ. The project delivery partner should be made aware as soon as possible that this would be a necessary element of the Digital Environment Management Plan.	The Applicant acknowledges the comments regarding the inclusion of archaeological matters within the digital Environmental Management Plan. The Applicant has previously addressed this matter in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192] page 81 and 8.4.9 Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 124. which confirms that the digital Environmental Management Plan and associated Geographic Information System will identify constraints and no-go areas, including ecological and archaeological mitigation areas. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in that submission.
2.9 Table 6.1 (H04) The Applicant notes the council’s comments on the wording of H04 in 7.2 Outline Code of Construction Practice [Revision D] and the suggested amendments. Having reviewed the suggested amendments against the current wording, it is the Applicant’s position that the suggested amended wording would not alter the actions to be taken in the event of the discovery of previously unknown heritage assets. Therefore the Applicant proposed that the current wording remains. For clarity the current wording of H04 is as follows: ‘Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. The Main Works Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions.’	SCCAS have concerns with the proposed wording put forward by the applicant, as H04 is in the OCoCP it needs to explicitly state that this is for the unexpected discovery of archaeological heritage assets during construction activities, and link H04 to the OAMS-OWSI which will detail how the archaeology would be mitigated. SCCAS would advise the following amendments to add clarity to H04: “Where, during construction activities, a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree an appropriate solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. This will be secured through a DWSI or Preservation In Situ Management Plan, in line with the approved OAMS-OWSI. The Main Works Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions". This adds clarity to the commitment within the OCoCP by making clear that it relates to the discovery of unexpected archaeology by construction workers during the construction phase. It also signposts that the procedures to be followed in the event of previously unknown archaeological heritage assets being discovered are set out in the OAMS-OWSI.	The Applicant confirms that the requested update has already been made to 7.2 Outline Code of Construction Practice [REP5-139].
ExQ	The OAMS-OWSI must reflect the potential for alternative crossing methods to be employed, if HDD is considered unviable following further geological assessment. “reported sequence of natural layers with no archaeological deposits” does not appear to reflect the findings set out in 6.11.A6 Environmental Statement Appendix 11.6 Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214] the report records the presence of peats and organic silts of currently	The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5 192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation

Matter with Applicant’s Previous Comment [REP4-298]	Suffolk County Council’s Comment [REP5-270]	Applicant’s Comment
	unknown date. This report also notes these deposits are likely to have high paleoenvironmental and archaeological significance, and further archaeological assessment of these deposits will be required (post-consent) to determine the level of significance and appropriate mitigation dependent upon final designs for the crossings.	Strategy and Outline Written Scheme of Investigation [REP5-161] includes provision for further geoarchaeological/ palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete.
2.12 Table 6.1 (W12) A substantial programme of archaeological evaluation (geophysical survey and trial trenching) has been undertaken and remains ongoing, and construction features such a drainage ponds and outfalls are within the Order Limits and as such have been considered and incorporated into survey areas which have already been completed and those yet to be undertaken. To the end of December 2025, approximately 3,000 trial trenches and 1,650 hectares of geophysical survey had been completed; the results to that date were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information (SEI) [AS068 to AS-083] , and Suffolk County Council has been made aware of this information. The vast majority of the priority geophysical survey and trial trenching areas are complete and are included within the SEI. The approach taken is proportionate to the importance and likely significance of the assets and exceeds the level of field evaluation often completed for comparable nationally significant infrastructure projects. Where further uncertainty remains, the Applicant has a clear and agreed programme for further work and mitigation. Phase 2 evaluation is underway in 2026 and all subsequent results will be shared with the Local Planning Authority Archaeological Advisors for review, in accordance With 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] .	SCCAS acknowledges the archaeological works undertaken to date, however, this do not cover the whole of the scheme. In particular, trial trenching does not extend to elements outside the priority areas. This includes features such as drainage ponds and outfalls, which, based on the information provided to us, are not currently proposed for trial trench evaluation as part of Phase 2 trenching. Revision of the OAMS-OWSI is necessary to ensure that all construction impacts are evaluated and, where appropriate, mitigated post-consent. This must be secured through robust and enforceable requirement wording and an approved OAMS-OWSI. There is currently no agreed programme for further/post-consent work and mitigation, as the OAMS-OWSI still requires significant amendment. SCCAS also note that, in Suffolk, the majority of trial trenching reports submitted to date are interim reports rather than full archaeological reports, and that SCCAS has not been consulted on, or involved in, any discussions with the applicant regarding the mitigation programme for the priority areas.	The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial tenching, as shown in the proposed trench plans provided directly to SCCAS on 3 June 2026. An updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] was submitted at Deadline 5 in response to comments provided by SCCAS, Historic England and other LPA archaeological advisors. There were four priority evaluation sites in Suffolk and two of the assessment reports for these were submitted in January. The other two have subsequently been shared with SCCAS directly in June 2026. SCCAS and the Applicant met to discuss the priority mitigation areas on 11 June 2026.
3.3 1.2.2 The council’s concern is noted. It is proposed to create habitats within the Environmental Areas within the Order Limits and therefore impacts to the historic environment have been considered as part of the Environmental Impact Assessment. It is not proposed to create habitats elsewhere within the Order Limits, habitats that are temporarily removed would be reinstated. The AMS- OWSI outlines the archaeological mitigation proposed for all areas of impact within the Order Limits. There are no proposals for the Applicant to create habitats off site. The Applicant will purchase biodiversity units to deliver a net gain in biodiversity; these will be obtained from organisations that are registered with Natural England to sell units. The Applicant will not be creating/enhancing or managing these habitats. Therefore, the Applicant proposes to make no changes in the project Overview section.	SCCAS notes the Applicant’s clarification that habitat creation within the Order Limits, where it forms part of the authorised works or project mitigation and has the potential to affect archaeological remains, would be addressed through the programme of archaeological works defined in the AMS-OWSI and subsequent DWSIs. SCCAS also notes the Applicant’s position that it does not propose to create, enhance or manage off-site habitats, and that biodiversity units would instead be purchased from organisations registered with Natural England. However, where any off-site habitat creation, enhancement or management is relied upon as part of the project’s BNG or environmental mitigation package, SCCAS considers that the archaeological implications of those works should be appropriately assessed and, where necessary, secured. This may be through the DCO archaeological requirements where the relevant land or works are secured by the DCO, or through an equivalent legally enforceable mechanism or obligation where works are delivered outside the Order Limits.	In order to be registered on Natural England’s off-site Biodiversity Net Gain (BNG) register, a series of steps are undertaken which includes consideration of other environmental constraints such as archaeology. No specific commitments regarding off-site BNG locations and archaeology as part of this Development Consent Order are therefore necessary or possible. Works within the Order Limits would be subject to the programme of archaeological works secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] , which already includes provision for environmental mitigation. The details of this would be set out in subsequent DWSIs.

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	Any on-site habitat creation areas within the Order Limits should be clearly identified in the AMS-OWSI and/or relevant DWSIs where they involve ground disturbance or other works with potential to affect archaeological remains. Any BNG habitat creation should be sensitive to the historic environment.	
3.8 Table 5.4 The Applicant has addressed Suffolk County Council Archaeology Service’s concern on page 357 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], noting that clay breakouts and HDD risks are mitigated under GH11 and GH12 in 7.2 Outline Code of Construction Practice [Revision D] and that commitment B26 specifically commits to a trenchless crossing method statement and contingency plan for the River Stour crossing by the Main Works Contractor(s), once detailed design is available. Also, the Applicant agrees that close coordination between all Clerks of Works within the Outline Landscape and Ecological Management Plan [REP3-030] and the Archaeological Clerk of Works is essential to deliver both ecological and archaeological requirements smoothly and without conflict. This will be clarified and formalised in 7.2 Code of Construction Practice [Revision D].	This is mitigation for contamination, not mitigation for impacts upon archaeological remains or deposits. GH11 SCCAS agree with the proposed amendment to include assessment of sensitive archaeological deposits. However, GH12 does not reflect the need for a separate methodology to manage drilling clay breakout in areas of archaeological sensitivity. The standard methodology to seal and provide remediation for breakouts would be damaging to archaeological remains which are to be preserved in situ therefore, a separate methodology should be developed for these areas and this should be noted in GH12. SCCAS would recommend an additional bullet point in GH12: • In areas of archaeological sensitivity, a separate methodology for containment, removal and remediation of drilling clay break out will be developed, in consultation with the relevant LPAAA, project archaeologists and where necessary Historic England. SCCAS welcomes the applicant’s commitment to ensure close coordination between all project Clerks of Work to ensure smooth delivery of the project.	7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] already includes for trenchless crossings, at paragraph 4.6.13: “<i>Where it is determined that preservation in situ is achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting, emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance.</i>” As this is already committed to, and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] is secured through Requirement 5 of 3.1 Draft DCO [REP5-060], the Applicant does not consider it is necessary to also update GH12.
3.10 6.1.35 If it is necessary to displace water vole they are to be displaced into the sections of watercourse that adjoin the impact area. There is no proposal to create new waterbodies or water features for water vole. Cutting back bankside vegetation to encourage water vole to move out of the construction area, and digging back into burrows in areas where culverts are to be located, would not lead to additional impacts over and above what has been assessed for the watercourse crossings. The Applicant acknowledges the council’s point that archaeology should be considered in relation to water vole displacement. Details on this issue have been provided in the Applicant’s response to the council on pages 357 – 358 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. In summary, the impacts of ecological mitigation on archaeology are addressed in 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS070]. Any mitigation of these effects will be Delivered in accordance with the governance Framework set out in 7.2 Outline Code of Construction Practice [Revision D] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].	The creation of Water Vole exclusion zones typically requires removal of vegetation and burrows 50m either side of the crossing location. Therefore, there would be the potential for disturbance of the banks to have archaeological implications. There should be appropriate provision within the OAMS-OWSI, SCCAS suggests the following paragraph is added to the OAMS-OWSI: “Where water vole displacement is required, appropriate archaeological assessment and mitigation will be undertaken.” For similar projects in areas of high archaeological potential a programme of archaeological monitoring and recording was employed during works for water vole displacement to mitigate impacts upon archaeology.	The Applicant has previously addressed the archaeological implications of water vole displacement in 8.4.9 Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] and 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], which clarify that displacement activities do not generally involve ground disturbance, and that any ground breaking works would be subject to the programme of archaeological works secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], which already includes provision for environmental mitigation, and subsequent DWSIs. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in those submissions.

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3.11 7.5.15 The Applicant acknowledges veteran trees as living monuments potentially connecting them to past human activity and land use, for example lapsed pollard management and their link to bio-cultural heritage. The Applicant has committed to reducing the overall impacts on trees, see commitments GG14 and LV08 of 7.2 Outline Code of Construction Practice [Revision D]. The Applicant acknowledges the council’s point that archaeology should be considered in relation to the survival of veteran trees and the historic landscape. A response to the council on this issue has been provided on page 358 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].	SCCAS note that surviving veteran trees are important elements of the historic landscape and are strong indicators of potential archaeological remains. SCCAS welcome the applicant’s commitment to undertake archaeological assessment and mitigation in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] and request that this be included in the OAMS-OWSI.	The Applicant has previously addressed the archaeological implications of veteran trees in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in that submission.
3.12 7.7 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paragraphs 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged. Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission of the application for development consent, and the results of this work, including a deposit model, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. The results revealed a sequence of natural geological layers with no archaeological deposits identified. Provision for further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which, as stated earlier, will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. Commitment GH11in 7.2 Outline Code of Construction Practice [Revision D] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing.	For clarification, SCCAS are not referring to the hydrological impacts of frack out on the aquifer, as discussed in 6.9 Environmental Statemerep5-270nt Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]. Rather, SCCAS are referring to impacts on the hydrology of the superficial deposits, which may have significant implications for the survival of organic archaeological and palaeoenvironmental remains. In this context, the statement that <i>‘the results revealed a sequence of natural geological layers with no archaeological deposits identified’</i> does not appear to reflect the findings set out in 6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. That report records the presence of peats and organic silts of currently unknown date. It also notes that these deposits are likely to be of high palaeoenvironmental and archaeological significance, and that further archaeological assessment will be required. Given that the extent of impact will depend on the final crossing designs, SCCAS accepts that further geoarchaeological and palaeoenvironmental work may be undertaken post-consent to determine the significance of these deposits and inform appropriate mitigation.	The Applicant has previously addressed this matter in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], and notes SCCAS’s acceptance that further geoarchaeological and palaeoenvironmental work may be undertaken post-consent. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in that submission.
3.13 7.7.6 The Applicant notes the comment from Suffolk County Council. For clarification, paragraph 7.7.6 of 7.4 Outline Landscape and Ecological Management Plan [REP3- 030] states that a trenchless	Information received from the design team at the time of writing indicates that the western cable corridor is likely to be unsuitable for HDD due to the loose and soft deposits within the Alluvium and River Terrace Deposits. Direct pipe or pipejacking is likely required if cable installation proceeds in the western cable corridor. HDD may be feasible in the eastern corridor with reduced bore spacings.	MOTTS – John Weeks As discussed in paragraph 4.8.72 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] there are multiple methods of trenchless installation that could be used. The location and methodology for the trenchless crossing of the River Stour will be determined at detailed design following further investigation and

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technique would be viable for either corridor. This does not preclude any specific technique. The statement in Section 7.1 of 6.9.A4 of Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP- 185] indicates that the western cable corridor is likely to be unsuitable. However, following further studies, this crossing is now considered more viable. Commitment GH11, secured in 7.2 Outline Code of Construction Practice [Revision D], states that at trenchless crossings a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors and identify any additional mitigation or remediation that may be required. This is reinforced by commitment GH12, which secures further detailed and appropriate design of all trenchless crossings.	Above is the paragraph from Section 7.1 of 6.9.A4 of Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP- 185]. SCCAS have not seen the results of these further studies, can you please indicate where these can be found within the submissions. For GH11 and GH12 please see SCCAS resposnse to NG’s response to 3.8 and 3.12.	detailed design; however, all potential options have been allowed for within the assessment. Refer to Appendix C of 6.9.A4 Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP-185] for details on possible trenchless methodologies.
3.15 • The Applicant welcomes SCCAS’s comments and draws attention to section 1.3 of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP328], which states that 7.2 Outline Code of Construction Practice [Revision D] and 7.4 Outline Landscape and Ecological Management Plan [REP3-030] already address mitigation for historic buildings and the historic landscape. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] contains consideration of archaeological remains. Therefore the Historic Environment is addressed across these documents. • Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission of the application for development consent, and the results of this work, including a deposit model, is included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP214]. The results revealed a sequence of natural geological layers with no archaeological deposits identified. Provision for further Geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. Commitment GH11 in 7.2 Outline Code of Construction Practice [Revision D] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing. The River Stour HDD is covered by a trenchless crossing method statement (commitment B26). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] provides the framework for evaluating and mitigating archaeological effects, including post-consent considerations, with ongoing coordination with Historic England and	• It is the applicant’s responsibility to ensure that all these documents work together, and to ensure that they do not contradict or create a scenario where delivery of protections of one part of the environment damages another. • The statement regarding the results of 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214] is incorrect. The report records the presence of peats and organic silts of currently unknown date. This report also notes these deposits are likely to have high paleoenvironmental and archaeological significance, and further archaeological assessment of these deposits will be required (post-consent) to determine the level of significance and appropriate mitigation dependent upon final designs for the crossings. Can the applicant confirm that the Hydrological risk assessment for crossing locations will include assessment of hydrology of superficial deposits and impacts on archaeological and palaeoenvironmental remains? • The OWSI specifically refers to post-consent archaeological works. The OAMS-OWSI must reflect the potential for alternative crossing methods to be employed, if HDD is considered unviable following further geological assessment.	The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] includes provision for further geoarchaeological/ palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete. Regarding the Hydrogeological Risk Assessment commitment GH11 in 7.2 Outline Code of Construction Practice [REP5-139] includes assessment for archaeological deposits. It is the Applicant’s view that 7.2 Outline Code of Construction Practice [REP5-139], 7.4 Outline Landscape and Ecological Management Plan [REP5-157] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] complement each other and do not contain contradictions.

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Local Planning Authorities. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] addresses the management and preservation in situ of archaeological remains. For the additional points raised here refer back to our response to matters 2.9 and 3.8.		
5.10 3.16.8 The Applicant can confirm that it is committed to delivering an Employment and Skills Plan and that this will be secured by a DCO Requirement. The Employment and Skills Plan will be submitted into the examination at Deadline 5 as an outline document with the DCO requirement securing the preparation of a final document in accordance with the outline which shall be agreed by the relevant planning authority. The Applicant welcomes the suggestions made by Suffolk County Council with regard to the contents of the plan. Whilst outline, the document will make reference to working with the Regional Skills Coordination Function in order to align training provision through a Project-specific local education and training strategy if this is agreed by all parties as being the most appropriate mechanism. The precise workforce breakdown for the construction, including skills and role durations for the Project, is yet to be confirmed by the Main Works Contractors. This includes details on matters such as the supply-chain workforce requirements. However, the plan will list the potential mechanisms to be used to engage and strengthen local supply chains with a commitment to sharing the precise measures to be taken with the Regional Skills Coordination Function and with other relevant organisations once these have been confirmed. These measures will be presented within the final Employment and Skills Plan post consent. The Plan will commit the Project to working with the RSCF in order to co-ordinate with the initiatives operated by other NSIPs on the matter of employment and skills provision.	SCC welcomes the Applicant’s confirmation that a Skills and Employment Plan (“SEP”) will be secured through a DCO Requirement; however, SCC does not consider that the Applicant’s response fully addresses the substance of the concerns previously raised. In particular, SCC remains concerned that the Outline SEP is not yet underpinned by the level of detail and evidence required to demonstrate how workforce demand, skills provision and cumulative labour pressures will be effectively managed. The Applicant’s continued position that detailed workforce breakdowns, including skills profiles, role durations and supply-chain labour requirements, will only be available following contractor appointment does not remove the requirement to provide a robust, phase-specific evidence base at this stage. EN-1 requires that the impact of workforce influx across different construction phases is properly assessed and that likely worst-case social and economic effects are evaluated where details are not yet fixed; this expectation cannot be met where key workforce data is deferred to post-consent. While SCC notes the Applicant’s commitment to reference the Regional Skills Coordination Function (RSCF) within the Outline SEP, the level of commitment remains insufficiently defined. The Applicant’s position that a project-specific education and training strategy will be developed “if agreed by all parties” lacks certainty and does not reflect the role of the RSCF as the established mechanism for coordinating labour demand, aligning training provision and managing cumulative impacts across NSIPs in Suffolk. SCC maintains that active participation in the RSCF, including structured data-sharing, joint planning and ongoing governance, is essential to ensure that the Project contributes effectively to a coordinated regional skills response and avoids duplication or fragmentation of provision. A high-level commitment to future engagement is not considered equivalent to a clear obligation to work through the RSCF framework. SCC is also concerned that the Applicant continues to defer the definition of specific interventions, supply-chain engagement measures and workforce-related outputs to a post-consent stage. While the Outline SEP refers to potential mechanisms and future information-sharing, it does not establish a clear linkage between forecast workforce demand and the scale or type of training, employment or supply-chain support required. Without this linkage, it is not possible to determine whether the proposed approach is proportionate, deliverable or sufficient to address identified skills gaps and labour market pressures. Furthermore, the absence of committed targets, monitoring arrangements and performance measures within the Outline SEP limits the ability to secure meaningful outcomes through the proposed DCO Requirement.	The Applicant acknowledges Suffolk County Council’s comments. 8.13 Outline Employment and Skills Plan [REP5-215] (OESP) is an outline, non-statutory document which establishes a framework for the delivery of employment, skills and supply chain outcomes. The assessment of workforce demand and associated impacts has been undertaken for the Project and is reported within 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision B] , including consideration of construction employment, labour market effects and associated socio-economic impacts. This includes an assessment of likely workforce requirements and their interaction with local labour markets at a proportionate level for the application stage. Further detail on workforce profiling, including phase-specific labour demand, skills requirements and delivery arrangements, will be developed through the Final ESP, informed by detailed design, construction programming and contractor input. The OESP recognises the importance of regional coordination mechanisms, including the Regional Skills Coordination Function (RSCF), in supporting alignment of skills provision and workforce development across the Eastern region. The OESP establishes a framework for engagement with relevant stakeholders and does not seek to duplicate or replicate existing regional coordination structures. The Applicant will engage with appropriate regional and local mechanisms, including the RSCF where relevant, to support coordination of employment and skills activity. Further detail on how this engagement will be taken forward in practice, including the role of relevant stakeholders and coordination arrangements, will be developed through the Final ESP, in collaboration with partners and informed by the construction programme and contractor input. The OESP sets out measures to maximise beneficial outcomes and support skills development. The approach set out within the OESP will be developed further through the Final ESP, which will include proportionate detail on delivery arrangements, including the identification of appropriate targets, responsibilities and monitoring frameworks, informed by detailed design, the construction programme and contractor input.

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	While SCC supports the principle of a DCO-secured SEP, it maintains that the current approach does not yet provide the necessary level of certainty, evidence or integration with regional governance structures to ensure compliance with SCC policy and EN-1 expectations. SCC continues to require that the Outline SEP is strengthened to include phase-specific workforce assumptions, clear articulation of skills demand, defined commitments to working through the RSCF, and a robust framework for monitoring, reporting and delivery. This is essential to ensure that the SEP can be relied upon as an effective mechanism for managing socio-economic impacts and maximising local skills and employment outcomes across the full lifecycle of the Project.	
Table 3: 7.4 (C) Outline Landscape and Ecological Management Plan (Tracked) [REP2-019] 3.1 The Applicant seeks clarification from the council with respect to the items that it considers remain outstanding.	The proposed natural regeneration of woodland (paragraph 9.3.9 of the oLEMP [REP3-031]) requires further clarification regarding how the potential need of supplementary planting of saplings will be secured and who will be responsible to carry out such works. Aftercare and management for these areas need to be secured through the DCO. Construction and operational lighting; both should be more clearly defined, in terms of hours, frequency, type of luminaire and fixtures, etc; operational lighting should be agreed with relevant discharging authority. Aftercare; the adaptive aftercare approach needs to include an adaptive aftercare period, in case planting struggles to achieve the required milestones or is failing; the trees to be planted as part of the OPDS should be included in the aftercare; annual monitoring reports to and annual inspections by the relevant local authority and/or the Ecology Working Group should be accommodated and required remediation measures agreed. The baseline to monitor against is the pre-construction baseline data. 7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan (Final Issue A) [REP4-176 and REP4 -177]: There remain numerous trees and hedges without ID label; it needs to be secured, when the relevant authorities can expect to be issued with a fully updated and complete Tree Survey Plan, including Tree Schedule, and Tree Protection Plan; it should also be clarified how the losses of Category C trees will be quantified. Further clarification is required as to which plans are best placed to include tree protection fencing; SCC is concerned that the Vegetation Reinstatement Plans are not the right place, as these may be issued too late in the process. No works should commence (including pre-commencement works) until a fully updated and complete Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPA in writing.	The measures identified in 7.4 Outline Landscape and Ecological Management Plan [Revision F] are secured through Requirement 5 of 3.1 Draft Development Consent Order [Revision F]. The final version of the Landscape and Ecological Management Plan will include further details and will be submitted to the Local Planning Authorities for approval as part of the discharge process. Construction working hours are controlled by Requirement 7 of 3.1 Draft Development Consent Order [Revision F], which sets the core working hours and provides for certain activities to take place outside those hours where permitted. Construction lighting will be used when required, including when daylight conditions make it necessary to carry out works safely. Per commitment GG26 in 7.2 Outline Code of Construction Practice [Revision F] construction lighting will be of the lowest luminosity to safely perform each task and include motion sensors or be switched off when not in use where it is safe and efficient to do so. 7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision D] contains details of operational lighting (substations), including Lux Level Plans in Appendix B. If the project is consented it must be built in accordance with the details within the DASSI. The Applicant has provided an Outline Offsite Planting Delivery Scheme at Deadline 6 to provide further detail on the offsite planting. The Applicant intends to submit the Unilateral Undertaking securing the commitment at Deadline 7. The agreement and outline document includes the commitment to the aftercare period for the offsite planting. 7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [REP4-176 and REP4 -177] omitted tree numbering; please refer to [REP1-065] for tree numbering that coincides with the tree schedule in Annex C of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]. A Tree Protection Plan will be produced along with the Arboricultural Method Statements for each phase of the Project as detailed in commitment GG31 of 7.2 Outline Code of Construction Practice [Revision F]. Paragraph 7.1.2 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] states ‘<i>All construction elements likely to impact on retained trees will be addressed within</i>

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	Please refer to comments in SCC Relevant Representations regarding Hedgerows [RR-3520]. In particular, the oLEMP should include commitments to secure the following: a. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists Hedgerows as habitats of principal importance in England, as boundary and linear features. b. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan. c. No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP need to be assessed and to agree replacements as part of the landscaping scheme. 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Final Issue A) [APP-325]: SCC would welcome further engagement with the Applicant to progress amendments to these proposals.	<i>an Arboricultural Method Statement (AMS) to be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing. The AMS will include protection measures including tree protection fencing as discussed in Section 7.3. and illustrated in a Tree Protection Plan.'</i> Losses to category C trees have been quantified within Table A13.6.3 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]. The Applicant has already undertaken detailed baseline hedgerow surveys that provide the baseline for the impact assessment and Biodiversity Net Gain calculations. This data will be updated as necessary at detailed design to inform the final metric Biodiversity Net Gain calculation. The Applicant will also maintain sufficient records to inform replanting for all impacted hedgerows. The Applicant does not propose to undertake further assessment with respect to the Hedgerows Regulations 1997. 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision C]:The Applicant is willing to further engage with Suffolk County Council regarding the Environmental Area at Wenham Grove Cable Sealing End compound. Updated landscape proposals will be provided at Deadline 7.
3.16 New paragraph 9.4.3 Targeted gap planting of hedgerows, where existing gaps are located within the Order Limits, will be undertaken as a hedgerow enhancement measure. Hedgerow gap planting will use appropriate native woody hedgerow species, which are characteristic of the local landscape. Further details regarding the location, quantities and species will be included within the final Landscape and Ecological Management Plan, once the design has been finalised and the precise locations for haul roads and other areas where vegetation is to be removed are known, quantified and locations where planting can take place identified.	SCC welcomes the additional paragraph regarding gapping up of hedges and would welcome a clear commitment in this regard.	The measures identified in 7.4 Outline Landscape and Ecological Management Plan [Revision F] are secured through Requirement 5 of 3.1 Draft Development Consent Order [Revision F].
5.5 3.12 The Applicant maintains that compensation measures for the potential loss of veteran trees contains practicalities for implementation requiring collaboration with landowners. The mechanism for securing compensation will, however, be in the final 7.4 Outline Landscape and Ecological Management Plan [REP3-030] which will be agreed with the relevant Local Planning Authorities. As per the mitigation hierarchy, compensation should only be applied as a last resort. The Project has first looked to avoid impacts to ancient woodlands through the routeing, siting and design process. where it is not possible to completely avoid impacts to ancient woodland, the Project has minimised impacts through design changes or modifications to working methodology. Standard	SCC (Landscape) appreciates that compensation measures for the loss of veteran trees will require collaboration with landowners. However, if this compensation relies on this collaboration and this is not forthcoming, then the compensation is in jeopardy. SCC would welcome further assurance by the Applicant that compensation for veteran tree loss will be fully secured through the DCO consent, through a clear commitment. SCC (Landscape) further considers that these measures also need to be agreed with the relevant local authority. Given that these measures would be agreed on a case-by-case basis, SCC ask for clarification on how these individual agreements will be included in the final LEMP. With regards to Ancient Woodlands, SCC notes that the Outline oCoCP Appendix D Dust Management Plan [REP4-167] does not	The draft Statement of Common Ground with Natural England (5.9.13 Draft Statement of Common Ground - Natural England [REP4-081]) addresses replacement planting and veteranisation of trees taking account of non-collaboration with landowners. The standard practices that protect vegetation from dust would be sufficient to avoid adverse impacts to ancient woodland; no site-specific measures are therefore necessary and no updates are proposed. The site-specific measures required to protect ancient woodlands are identified in 7.4 Outline Landscape and Ecological Management Plan [Revision F] and 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision C]. At detailed design the Project would seek to further minimise impacts to ancient woodland and so it is not considered necessary to identify measures to

Matter with Applicant’s Previous Comment [REP4-298]	Suffolk County Council’s Comment [REP5-270]	Applicant’s Comment
mitigation included within 7.2 Outline Code of Construction Practice [Revision D] and additional mitigation measures included within 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032] ensure no significant long- term residual effects on ancient woodland are encountered as a result of the Project. Compensation for ancient woodland is therefore not currently proposed within the ancient woodland strategy.	appear to include any safeguarding commitments to avoid adverse impacts on Ancient Woodlands (as well as veteran/mature trees) resulting from dust. SCC (Landscape) further considers that the 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] should contain a provision for compensation for Ancient Woodlands, as a safeguard in case it becomes necessary.	compensate for impacts to ancient woodland on a precautionary basis.
5.9 3.12.21-3.12.26 The Applicant notes the council’s comments and whilst the Applicant’s position remains unchanged on the length of the aftercare period for planting outside the Environmental Areas, the Applicant would welcome sight of the council’s monitoring evidence that this period is insufficient given this would be a deviation from National Grid’s previously consented nationally significant infrastructure projects.	SCC has ample experience (and records) of planting schemes that were not ready for handover after five years of aftercare. This is why SCC promotes adaptive aftercare periods. If the planting is established and thriving after five years, SCC would be content for the handover to take place. SCC considers the ‘as-required time extension’ necessary, to avoid large-scale failed planting schemes being handed back to the landowners, leaving them and Suffolk’s biodiversity worse off. SCC considers the delivery of successfully established replacement and mitigation planting as part of the delivery of the project as a whole and would welcome a greater commitment from the Applicant to this element of the project.	The Applicant maintains its position on the sufficiency of the five- year aftercare period but has updated Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] which relates to aftercare, to include some additional detail.
Table 4.20: Landscape and Visual – SCC Responses to New Matters and Applicant Clarifications 5.48 Table 4.20 (13.166, 13.186 and 13. 187) The Applicant acknowledged SCC’s concerns and has addressed them in 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030] (see page 89), confirming the Final Landscape and Ecological Management Plan (LEMP) will be subject to the agreement of the LPA. 7.4 Outline Landscape and Ecological Management Plan Appendix B – Ancient Woodland and Veteran Tree Strategy [REP3-030] states ‘The final mitigation measures, remediation works and long- term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by- case basis.’ This passage above is referring to the Final LEMP, which will be agreed with relevant LPAs.	As previously stated in [REP3-085] , it is not only about the final LEMP(s) being agreed with the relevant discharging authority, but also about the final mitigation measures and remediation works, and long-term monitoring referred to within.	7.4 Outline Landscape and Ecological Management Plan [Revision F] identifies the mitigation measures, remediation measures and monitoring that the Applicant has identified to be necessary to mitigate for the impacts of the Project. This will require refinement at detailed design, but the Applicant does not anticipate that new principles of mitigation are likely to arise at the detailed design stage.
5.49 Table 4.20 (13.16) The Applicant has responded to this topic in its response to question HE 1.10 provided in 8.9.1 Applicant's Responses to First Written Questions [REP3-074] . ‘Sensitivity testing’ has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value	SCC’s position remains unchanged. Changes within the Limits of Deviation could also affect residential properties which are not historic assetSETs, but for which changes could make matters worse, even if they are within the same assessment bracket.	In 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] (the RVAA) the Applicant has assessed the worst-case scenario with regards to the potential movement of the Project within the Limits of Deviation (LoD) where it lies close to residential properties. Whilst it is acknowledged that if you move part of the Project closer to a property, it will, in most cases, lead to increased harm to residential visual amenity, Tables A13.4.4 to A13.4.67 within 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] identify that on no occasions does it lead to a breach of the Residential Visual Amenity Threshold.

Matter with Applicant’s Previous Comment [REP4-298]	Suffolk County Council’s Comment [REP5-270]	Applicant’s Comment
of a heritage asset. While alternative locations within the LoD have been considered, 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the 11.7 Residual Effects section of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets, specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision D] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst- case potential effects of locating pylons or conductors anywhere within the LoD; and the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans Sections A and B [APP017 and APP-018], Section C [Revision B], Sections D to G [APP-020 to APP-023] and Section H [Revision B].		
5.51 Table 4.20 (13.194 – 13.197) The Applicant welcomes the council’s detailed suggestions as set out in the LIR. As previously stated within 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (in Table 4.20, ID 13.194 -13.97, pages 477 - 478), the detail of construction stage planting plans is to be provided in the final LEMP, and will be approved by the Local Planning Authorities.	As mentioned earlier in this table, SCC would welcome further engagement with the Applicant to achieve agreement on the outline proposals for the Wenham CSEC. SCC is concerned that if the proposals are consented as they currently are, the outcomes for mitigative planting will be insufficient and views from VP 3.25 [APP-346] will remain open.	The Applicant is willing to further engage with Suffolk County Council regarding the Environmental Area at Wenham Grove Cable Sealing End compound. Updated landscape proposals will be provided at Deadline 7.

Appendix F

Additional Detailed Design Requests

Appendix F Additional Detailed Design Requests

Through ongoing engagement with landowners and other interested parties, a number of potential design refinements have been identified for further consideration as part of the Project's detailed design development. In the event that the DCO is granted for the Project then these potential refinements are designed to fall within the parameters proposed to be authorised by the DCO, including the Limits of Deviation and/or the Order Limits, and remain within the scope of the environmental assessment reported in the Environmental Statement.

These potential refinements have been identified at an early stage because they reflect a preferred direction of change expressed by a landowner or other interested party during consultation and engagement. However, it is important to be clear as to their status. They do not represent commitments by the Applicant and remain subject to the detailed design process. In particular, any such refinement:

- 1. remains subject to the outcome of further information gathering, surveys, ground-truthing and technical assessments;
- 2. must comply with the development management and approval mechanisms contained within the draft DCO, including the relevant Requirements and certified documents;
- 3. remains subject to the consideration of other stakeholder interests, engineering, environmental, operational, safety, land and programme requirements, together with the need to secure an appropriate overall design solution; and
- 4. remains subject to all statutory duties and other legal obligations applicable to the Applicant.

For the avoidance of doubt, the Secretary of State may also impose additional requirements or constraints through any development consent ultimately granted.

The Applicant considers that the identification of these potential design refinements demonstrates a constructive approach to stakeholder engagement and a willingness to consider opportunities to accommodate local preferences where permitted and where reasonably practicable. However, for the purposes of determining the application, no matter how well intended by the Applicant, they should not be treated as embedded mitigation, proposed mitigation or secured mitigation within the mitigation hierarchy. Nor should they be relied upon as measures that are committed to be delivered through the DCO. The planning merits of the application should therefore be assessed on the basis of the Proposed Development and the mitigation secured through the application documents, without attributing weight to these potential future detailed design refinements.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 1	Consultation Feedback	Alignment	RG14	Restrict as far as practicable south-westerly movement to not encroach into existing solar farm boundary.
ADDR - 2	Consultation Feedback	Haul road	RG15-RG16	Seek to agree position of haul road via voluntary agreements at the time of construction.
ADDR - 3	Consultation Feedback	Alignment	RG18	Restrict as far as practicable southerly movement of pylon and consider offset working area to minimise encroachment onto the proposed solar proposal.
ADDR - 4	Consultation Feedback	Vegetation	RG28	In proximity to Elm Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 5	Consultation Feedback	Vegetation	RG38	In proximity to Northfield Road, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 6	Consultation Feedback	Alignment	RG43-RG44	Restrict south and north movements as far as practicable to maintain benefit of screening by woodland.
ADDR - 7	Consultation Feedback	Alignment	RG45	Restrict southern movement as far as practicable to maintain benefit of screening by treelined road to retain RG45 to east of road with restriction of movement to the north and east of RG46 to avoid knock on positional changes.
ADDR - 8	Consultation Feedback	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 9	Consultation Feedback	Alignment	RG74	Restrict movement to the northeast as far as practicable to avoid pylon in ecological sensitive site.
ADDR - 10	Consultation Feedback	Alignment, access, working space	RG86-RG88	The detailed design of RG86-RG88 will take into account the river restoration works and any potential change in river alignment associated with the Waveney and Little Ouse Recovery (WaLOR) project and will avoid impacts on areas of high ecological value resulting from the WaLOR project where practicable.
ADDR - 11	Consultation Feedback	Vegetation, Traffic management	RG106-RG107	In proximity to Furze Way, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 12	Consultation Feedback	Permanent access route	RG106-RG109	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 13	Consultation Feedback	Construction Laydown Area	RG124-RG125	Seek to agree laydown area location with landowners to minimise impact
ADDR - 14	Consultation Feedback	Permanent access route	RG127-RG130	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 15	Consultation Feedback	Permanent access route	RG134-RG136	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 16	Consultation Feedback	Vegetation	RG144	In proximity to Palgrave Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 17	Consultation Feedback	Alignment	RG144-RG145	Following detailed design, seek to ensure the alignment crosses the driveway mid-span unless following detailed design it is determined to not be practicable.
ADDR - 18	Consultation Feedback	Vegetation	RG148	In proximity to Owls Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 19	Consultation Feedback	Alignment	RG151	Restrict north and south movements of pylon to reduce agricultural impacts, unless following detailed design it is determined to not be practicable.
ADDR - 20	Consultation Feedback	Hedgerow	RG163	As far as practicable avoid removal of hedgerow to the west of RG163.
ADDR - 21	Consultation Feedback	Historic environment	UKPN EEPK12	The applicant is aware of particular sensitivity of works around existing UKPN pylon EEPK12, close liaison necessary with landowner to ensure no impact to the sensitive location.
ADDR - 22	Consultation Feedback	Alignment	UKPN EEPK14 / RG77	UKPN to keep EEPK14 as close to the previous pylon as far as practicable.
ADDR - 23	Consultation Feedback	CSE platform	PI35	Ensure following detailed design the position CSE platform is located as close to the concrete pad as possible unless following detailed design it is determined to not be practical.
ADDR - 24	Consultation Feedback	Permanent access route	RG194	Permanent access to OHL pylon location to be agreed via voluntarily agreements at the time of operational survey and maintenance access required, subject there being a suitable point of access into the field.
ADDR - 25	Consultation Feedback	Alignment, Haul road	RG195	Restrict easterly movement as far as practicable to remain to the west of Offton Road.
ADDR - 26	Consultation Feedback	Permanent access route	RG196-RG200	Seek to agree permanent access to OHL pylon locations to via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 27	Consultation Feedback	Alignment	JC1-JC7	As far as practical keep OHL north to avoid areas of ancient woodland and increase distance from residential properties and village to the south.
ADDR - 28	Consultation Feedback	Alignment	JC16	Restrict northern movement as far as practicable to maintain benefit of screening by treeline.
ADDR - 29	Consultation Feedback	Alignment	JC18	Restrict southerly movement as far as practicable to remain to the north of Washbrook Street.
ADDR - 30	Consultation Feedback	Permanent access route	JC27-JC35	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 31	Consultation Feedback	Hedgerow	JC Cable Chainage 5000-5100	As far as practicable avoid damage to the boundary feature / hedge to the east of the cable construction swathe.
ADDR - 32	Consultation Feedback	Trees	JC Cable Chainage 13100-13200	In proximity to Hunters Chase, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 33	Consultation Feedback	Construction in proximity to property	Holton St Marys - Lark Hall	Seek to maximise the distance between construction and the property and be sensitive in construction and timeframe impacting property.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 34	Consultation Feedback	Trees	JC Cable Chainage 16456-16500 (TB3-TB4)	In proximity to Bounds Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 35	Consultation Feedback	Trees	TB10-TB11	In proximity to Foxash Estate, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 36	Consultation Feedback	Trees	TB15-TB16	In proximity to Fountain Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 37	Consultation Feedback	Haul road	TB18-TB19	Construction contractor to liaise with landowner regarding presence of livestock in the field and the appropriate management.
ADDR - 38	Consultation Feedback	Historic environment	TB21	Commitment not to damage Grade II listed milestone TB21
ADDR - 39	Consultation Feedback	Alignment	TB28-TB29	Restrict southern movement of OHL and avoid works in garden where practicable.
ADDR - 40	Consultation Feedback	Haul road	TB30	Liaise with landowner during detailed design and construction to minimise impact where practicable and informed by outcome of final pylon siting
ADDR - 41	Consultation Feedback	Alignment	TB46-TB47	Liaise with owner of adjacent reservoir during detailed design and construction to avoid impact to reservoir, keep works to south where practicable.
ADDR - 42	Consultation Feedback	Haul road	TB49-TB50	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 43	Consultation Feedback	Alignment	TB67-TB68	Avoid or reduce works within residential gardens as far as practicable for the UKPN low voltage works west of TB67-TB68.
ADDR - 44	Consultation Feedback	Alignment	TB69	Move TB69 beyond east or west as far as practicable to maintain benefit of screening by trees
ADDR - 45	Consultation Feedback	Compound area	TB69	Compound location to be discussed with landowners to minimise impact
ADDR - 46	Consultation Feedback	Storage area	TB72	Seek to utilise the land within the OHL LoD alignment for the stone storage area to enable release of the area to the west of the proposed OHL back to landowner for continued agricultural use
ADDR - 47	Consultation Feedback	Haul road	TB75-TB76	Aspiration for landowner to retain bellmouth and / or sections of the haul road. Subject to landowner gaining relevant permissions prior to NG/GGP commencing the reinstatement works.
ADDR - 48	Consultation Feedback	Permanent access route	TB93-TB94	Seek to not use the permanent access between TB93 and TB94
ADDR - 49	Consultation Feedback	Alignment	TB94	Entry superseded by ADDR - 81
ADDR - 50	Consultation Feedback	Alignment	TB98	Avoid positioning pylon TB98 and its working area in the horse paddocks to the east where practicable
ADDR - 51	Consultation Feedback	Alignment	TB99	Avoid movement of TB99 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 52	Consultation Feedback	Alignment	TB103	Restrict movement to maintain the avoidance of oversail of the football goals as far as practicable
ADDR - 53	Consultation Feedback	Ecology	TB121-TB122	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 54	Consultation Feedback	Alignment	TB124	Avoid movement of TB124 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 55	Consultation Feedback	Permanent access route	TB137	Seek to agree permanent access to OHL pylon locations via voluntary agreements at the time of operational survey and maintenance access required.
ADDR - 56	Consultation Feedback	Haul road	TB159-TB160	Aspiration to restrict haul road route through Scout Jamboree site if the festival has not moved to a new location in 2028.
ADDR - 57	Consultation Feedback	Construction works scheduling, haul road	TB159-TB161	Work with the landowner and the Scouts to minimise any impact to the 2028 Scout Jamboree.
ADDR - 58	Consultation Feedback	Alignment, traffic management	TB165-TB166	Seek to agree road closure of Newney Green for OHL stringing works

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 59	Consultation Feedback	Trees	TB168-TB171	In proximity to Ongar Road, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 60	Consultation Feedback	Haul Road, hedgerow	TB181-TB184	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 61	Consultation Feedback	Historic environment	TB183	Commitment not to damage Grade II listed milestone
ADDR - 62	Consultation Feedback	Permanent access route	TB192	Seek to agree permanent access to OHL pylon location via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 63	Consultation Feedback	Haul road	TB192-TB193	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 64	Consultation Feedback	Alignment	TB203 & TB204	Avoid movement to minimise encroachment onto the solar proposal unless following detailed design it is determined to not be practicable
ADDR - 65	Consultation Feedback	Ecology	TB204	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 66	Consultation Feedback	Construction works	TB243-TB245	Liaise with owner adjacent to works during detailed design and construction to minimise impact on effluent spreading activities where practicable and ensure appropriate funding mechanism in place for rapid cash-flow neutral response where off-site mitigation is required.
ADDR - 67	Consultation Feedback	Alignment, Construction works	TB257-TB258	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 68	Consultation Feedback	Alignment	TB258	Restrict movement to the south to minimise encroachment onto the aggregates facility unless following detailed design it is determined to not be practicable
ADDR - 69	Consultation Feedback	Alignment	TB259-TB260	Restrict movement to the west and favourin the maintain minimum separation from the high-pressure gas pipeline as far as practicable
ADDR - 70	Consultation Feedback	Alignment	YYJ and ZB overhead lines	The applicant has taken the decision to progress Scenario B for Design Scenario 18, as stated in the letter to the Examining Authority dated 9th February 2026 [AS-084] , and will continue to liaise with the developer accordingly during detailed design and shall seek to avoid impact on their programme of construction.
ADDR - 71	Consultation Feedback	Permanent access route	YYJ119	Permanent access to OHL pylon locations to be agreed via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 72	Examination Submission [REP2-028]	Haul road	Farm in Wenham	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations, as per Outline Code of Construction Practice Commitment Reference AS03 [REP2-014] .
ADDR - 73	Examination Submission [REP2-028, REP1-456]	Construction works	JC Cable Chainage 4100	Construction would not need to extend into the garden at Lark Hall.
ADDR - 74	Examination Submission [REP2-028]	Permanent access route	The new permanent access road for the EACN	Commitment for access to be maintained for the applicant and landowners with adequate means of security
ADDR - 75	Examination Submission [REP2-028, REP1-394]	Construction works	TB96 - TB98	Seek to restrict the southward movement of the construction Haul Road alignment, unless unavoidable to avoid breaking into the horse paddocks if possible.
ADDR - 76	Examination Submission [REP2-028, REP1-306]	Construction works	Salmons Lane	A short-term road closure is anticipated to be required to carry out this work. This will be confirmed during detailed design, and include further engagement with the landowner. Any closures would be planned and agreed with affected residences and business owners to ensure the minimal amount of disruption. Some work from the private access track is anticipated to be required in order to facilitate this crossing. However, access to the farm will be maintained at all times, and the majority of the work will be done from the fields and timings will be communicated to the relevant parties. Short closures of the private access track will be required for netting activities however the Contractor will liaise directly with the landowner to coordinate

Reference	Source	Design Aspect	Location	Aspirational Commitment
				these works. Given the narrow characteristics of the private access it is likely that the netting activities could be managed with stop/go banksman controls.
ADDR - 77	Examination Submission [REP2-028, REP1-245]	Haul road, Construction works	TB67 - TB68	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations and engagement to investigate current extent of land drainage, as per Outline Code of Construction Practice Commitment References AS03 & AS05 [REP2-014].
ADDR - 78	Examination Submission [REP2-028, REP1-434]	Mitigation measures	TB227 to TB229	Liaise with landowner during detailed design, construction and operation to maintain necessary biosecurity.
ADDR - 79	Examination Submission [REP2-028, REP1-427]	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 80	Relevant Representation [RR-0406]	Construction Works	RG14	Seek to minimise impacts of utility diversions on solar farm to the south of RG14 north as far as practicable
ADDR - 81	Relevant Representation [RR-1490]	Alignment	TB94	Move TB94 to the southwest to position, as far as practicable, the pylon and working area to avoid reduction in solar panel extent of consented solar farm proposals.
ADDR - 82	Relevant Representation [RR-1392, RR-2117, RR-3478]	Alignment	TB141	Seek to move TB141 as far as practicable along the alignment to southwest, to increase separation from property.
ADDR - 83	Relevant Representation [RR-1447]	Alignment	TB233	Move TB233 closer to the hedge unless following detailed design it is determined to not be practicable. Also liaise with landowner during detailed design and construction to minimise agricultural operations where practicable.
ADDR - 84	Relevant Representation [RR-0463, RR-2143]	Alignment	TB47	Seek to move TB47 within LoD as far south as far as practicable.
ADDR-85	Engagement	Alignment	TB143	Seek to move TB143 to the west by an inline movement extending the preceding span (from TB141) subject to confirming electrical clearance requirements, upto 20m movement may be achieved without compromise to conductor pulling zone
ADDR-86	Engagement	CSEC	Fairstead	Seek to reduce the extent of land retained to the east of the Ccable Sealing Ends (CSEs) for soil storage and landscape planting to around 60m depth to return circa 3 hectares to agricultural cropping
ADDR-87	Engagement	Permanent Access route	TB141 to TB143	Subject to securing landowner agreement, secure permanent access to TB141 OHL pylon location (noting TB142 has been removed as a result of the scenario decision to replace three low height pylons with two standard lattice pylons) via the access to TB143 by voluntary agreements at the time of operational survey and maintenance access required.
ADDR-88	Engagement	Alignment	TB245	Seek to move pylon TB245 to the north (aiming for upto 50m) if practicable
ADDR-89	Engagement	Alignment	TB249 to TB253	Explore whether increased span lengths would allow either a reduction in pylon numbers or more pylons to be located on field boundaries. Liaise with landowner if appears viable.
ADDR-90	Engagement	Construction and Permanent Access Route	TB215 and TB216	As a result of track removal by landowner, agree appropriate alternative arrangements within OL to reduce farm impacts and permanent access at the time required to respond to cropping pattern
ADDR-91	Engagement	Permanent Access Route	TB227 to TB231	Retain proposed right of access but continue to investigate alternatives during construction and operation which may include securing voluntary agreements with other affected parties
ADDR-92	Engagement	Land take	East of EACN	Seek to agree arrangements re irrigation mains access
ADDR-93	Engagement	Land take	North of EACN	Seek to agree arrangements re Bund position and BESS access
ADDR-94	Engagement	Permanent Access Route	RG185 & RG186	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-95	Engagement	Alignment	TB224	Seek to move TB223 to TB224 as close to the gas pipeline as possible to move TB223 away from the solar panels and to increase alignment separation to residential property to the extent practicable

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR-96	Engagement	Construction Access	RG46 to RG48	Adjust haul road alignment to maximise use of existing hedgerow gaps
ADDR-97	Engagement	Permanent Access Route	RG191 to RG197	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-98	Engagement	Permanent Access Route	RG182 to RG184	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-99	Engagement	Permanent Access Route	RG113	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-100	Engagement	Environment and Construction Access	RG21	Microsite the alignment and route of the construction access to avoid Tree SN-0697 and its immediate surroundings to respond to advised sensitivities regarding scattered ashes. If encroachment close to the tree is unavoidable then ensure liaison with landowner to seek to minimise impact
ADDR-101	Engagement	Environment and Construction Works	TB168 to TB169	Utilise available alignment and height LOD and careful scaffold positioning to seek to retain lines of roadside memorial trees along the A414 Ongar Road and undertake appropriate crown management to avoid need for removal. If removal unavoidable then ensure liaison to seek to minimise impact.
ADDR-102	Engagement	Construction Access and Temporary Works	TB223	Seek, where possible, to microsite the access and compound arrangements to reduce overall landtake and increase separation to the Farmstead. Consider benefit of sequential uses and other adjustments..
ADDR-103	Engagement	Construction Access	TB94	Continue to liaise with landowner and solar developer to seek to identify opportunities to secure construction access with reduced impact on solar panels.
ADDR-104	Engagement	Permanent Access Route	RG146 & RG147	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.
ADDR-105	Engagement	Permanent Access Route	RG148	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping patter
ADDR-106	Engagement	Permanent Access Route	RG29 & RG30	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.6
ADDR-107	Engagement	Permanent Access Route	RG35 & RG36	Avoid reducing space between hedgerow and fenceline to be below 40m where practicable
ADDR-108	Engagement	Alignment and pylon position	TB64	Seek to restrict westwards movement to maintain screening by agricultural barns as far as practicable
ADDR-109	Engagement	Permanent Access Route	RG22	Retain proposed permanent right of access but agree appropriate alternative permanent access within the landownership at the time required to respond to cropping pattern.6

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com