

AENC-NG-CNS-REP-0374

Norwich to Tilbury

Volume 8: Examination Documents

Document: 8.5.12 Applicant's Written Summary of Oral Submissions
and Response to Action Points for Issue Specific Hearing 4

Final Issue A

July 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Contents

1.	About this Document	1
1.1	Introduction	1
1.2	Attendees on Behalf of the Applicant	1
1.3	Structure of the Document	2
2.	Applicant’s Oral Case and Responses to ISH4	3
2.1	Item 5: Landscape and Visual Effects	3
2.2	Item 6: Noise and Vibration	70
2.3	Item 7: Aviation Safety	84
2.4	Item 9: Any Other Matters	95
Table 2.1 Item 5 (Landscape and Visual Effects)		3
Table 2.2 Item 6 (Noise and Vibration)		70
Table 2.3 Item 7 (Aviation Safety)		84
Table 2.4 Item 9 (Any Other Matters)		95
Annex A	Schedule 20 Landscape Compensation, Offsetting and Enhancement in Relation to Specified Locations	
Annex B	Applicant’s Response to Action Point 23	

1. About this Document

1.1 Introduction

- 1.1.1 This document summarises the case put by National Grid Electricity Transmission plc (the Applicant), at Issue Specific Hearing 4 (ISH4) on 25 June 2026 for the Norwich to Tilbury project (referred to as ‘the Project’). Given the current point in Examination and limited number of remaining Deadlines, the Applicant has also provided a response to the matters raised by Interested Parties (IPs) during ISH4 within this document, where appropriate.
- 1.1.2 ISH4 opened on 25 June opened at 10am and closed at 5.33pm.
- 1.1.3 The agenda for ISH4 was published on the Planning Inspectorate’s website on 15 June 2026 [EV2-011].
- 1.1.4 In what follows, the Applicant’s submissions on the points raised broadly follow the items set out in the Examining Authority’s (ExA) agenda. Where document references are included, these reference the latest versions submitted at Deadline 6, unless an earlier version specifically warrants noting in response to the point raised.
- 1.1.5 This document also provides the Applicant’s response to the ExA’s action points for ISH 4, which were published on 30 June 2026 [EV18-003] under the relevant item on the agenda.

1.2 Attendees on Behalf of the Applicant

- 1.2.1 [REDACTED], Counsel instructed by Bryan Cave Leighton Paisner LLP (BCLP), appeared on behalf of National Grid, the Applicant.
- 1.2.2 The following representatives were also present:
- [REDACTED], BCLP
 - [REDACTED], the Applicant (Acoustics)
 - [REDACTED], the Applicant (Acoustics)
 - [REDACTED], the Applicant (Aviation)
 - [REDACTED], the Applicant (Aviation)
 - [REDACTED], the Applicant (Options and Design)
 - [REDACTED], the Applicant (Arboriculture)
 - [REDACTED], the Applicant (Residential Visual Amenity Assessment)
 - [REDACTED], the Applicant (Landscape and Visual)
 - [REDACTED], the Applicant (Landscape and Visual)
 - [REDACTED], the Applicant (Consents)

- [REDACTED], the Applicant (Consents).
- [REDACTED], the Applicant (Landscape and Visual)

1.3 Structure of the Document

- 1.3.1 This document has one chapter which summarises the oral case made by the Applicant at ISH4 and also the Applicant's response to matters raised by IPs during the hearing. There was no discussion under Item 4: Change Request or Item 10: Review of Actions Arising and Closing). During the hearing, it was agreed that Item 8: Socio-economics would be covered by a Rule 17 letter. The Rule 17 letter was issued on 30 June 2026 [PD-029] and the Applicant has responded in **8.30 Applicant's Response to Rule 17 Letter Received 30th June [Revision A]**. Therefore, the remaining sections of this report focus on Agenda Item 5 (Landscape and Visual), Item 6 (Noise and Vibration), Item 7 (Aviation) and Item 9 (Any other Matters).

2. Applicant's Oral Case and Responses to ISH4

2.1 Item 5: Landscape and Visual Effects

Table 2.1 provides a summary of the oral case provided by the Applicant at ISH4 and also the Applicant's response to matters raised by IPs under Item 5 of the agenda, where appropriate.

Table 2.1 Item 5 (Landscape and Visual Effects)

Item No.	ExA Description	Applicant's Response
5.1 Mitigation		
5.1a	Compensation and the mitigation hierarchy Discussions on the principles of compensating landscape effects and whether the Applicant has mitigated landscape effects '<i>as far as possible</i>'. Given that the project is of unprecedented scale and length, is there a case exists for a strategic landscape compensation package as part of the application?	Oral Summary of the Applicant's Case The Applicant retains its position that there is no requirement in law or policy for landscape harm necessarily to be offset or compensated. It has considered the extent of the mitigation which it has provided which includes the use of the Holford and Horlock rules, embedded mitigation where necessary and the potential for screening or softening. It has considered whether compensation or offsetting landscape harm is a necessary policy requirement or could legitimately reduce the residual visual impact of the proposal. It has concluded that there is no necessary policy requirement and that offsite offsetting is not justified, necessary or proportionate. The Applicant has met all of the compensation/ offset provisions required of it by the legal and policy framework. Thus, it has met the compensation provisions required by the Habitats Regulations in so far as they arise and, importantly, the requirement to do more than mitigate in designated landscapes – paragraph 2.9.22 of EN-5, which specifically and solely identifies circumstances when the type of mitigation for pylons might need to go beyond the mitigation measures needed to minimise the adverse landscape effects of the Project. In addition, all policy

Item No.	ExA Description	Applicant's Response
		requirements to compensate in specific circumstances such as by replacement of woodland lost as a result of the Project have also all been met. There is no overhead line DCO made to date that has ever required the offsetting of unmitigatable landscape impacts. Some Applicants have made voluntary payments and agreed to impact softening planting (clearly a form of mitigation You ma offsetting) with little weight being given to either by ExAs or Ministers. It would be an incredible precedent to find as a matter of principle that offsetting of landscape harm was necessarily required in this case. EN-5 makes it clear that meeting the needs of the nation by the provision of overhead lines is not inconsistent with the statutory duties of the undertakers and requiring landscape compensation would potentially run to millions of pounds project by project, a cost which would need to be met inevitably by the consumer. If compensation or offset of landscape impact were required it is inconceivable that the NPS EN suite of policies would not say so expressly and give guidance on its calculation or operation. The main environmental effect of a line of pylons is of course its landscape impact. Paragraph 2.9.7 of EN-5 recognises this. EN-5 deals with these impacts and their mitigation. It identifies the forms of mitigation available in detail. This includes consideration of planting to secure the screening or softening of visual impact again clearly a form of limited mitigation and not an offset (see paragraph 2.10.5, to 2.10.6 of EN-5). It cannot be that that EN-5, which is dealing specifically with the visual impact of overhead lines, would be completely silent as to the requirement for the main harm from pylons (in accordance with the NPS starting presumption for overhead lines) to be offset by taking action (which by definition does not and cannot reduce impact) if such off-site provision of benefits was to be required to offset landscape harm. Further and separately, even if in principle compensation or offsetting could be required either by way of a condition or a s 106 agreement or otherwise, the Applicant and the decision-maker would need to consider the nature and extent of the offsetting provision that could lawfully be offered or required. The local authorities rely on EN-1 paragraph 4.2.11. It sits in the section of EN-1 labelled "Applicant's Assessment" and not in the decision-making section. It provides that Applicants should <i>"demonstrate that all residual impacts are those which cannot be</i>

Item No.	ExA Description	Applicant's Response
		<i>avoided, reduced or mitigated</i>". That is how residual landscape impact is to be understood. And as the new EN-1 (2026) points out, compensation as a matter of fact and law cannot reduce an adverse effect resulting from a development (paragraph 4.2,25). Paragraph 4.2.12 EN-1 (2024) does require Applicants to set out how residual impacts generally will be compensated for "as far as possible". This in the section called "Advice to the Applicant" must mean as far as possible including as far as legally possible. Section 120 of the Planning Act 2008 and EN-1 makes it clear that Requirements or s 106 provisions to secure offsetting or anything else should pass the tests required of planning conditions that applies in the Town and Country Planning Act 1990 system. These include the test of necessity. The test of necessity has been part of the law for decades. It dictates that a planning condition should not be imposed unless its absence would by itself justify refusing planning permission entirely (Newbury District Council v Secretary of State [1981] AC 578). The Applicant is clear that its Application is clearly consentable without substantial offsite landscape compensation which by definition would have no effect on the visual impact of the proposals in landscape terms. The Applicant has however indicated that if and insofar as the Councils are able to establish that offsite offsetting can be shown to pass the tests of necessity proportionality, of direct relationship to the proposal and reasonableness then the Applicant is prepared to consider such requests. In order that an appropriate DCO mechanism requirement be imposed (or a s 106 provision or other legal mechanism) and to be given any weight, the decision-maker must however ask itself whether without such provision of compensation and/or enhancement, the Application should be refused. That is a deliberately tough test in all DCOs and planning determinations. It is particularly pertinent in cases involving CNP infrastructure. The Councils in turn appear no longer to be asserting that there is a requirement on an Applicant necessarily to offset all landscape harm by way of landscape compensation. They appear now to accept that there is a requirement for any offsetting sought to meet the equivalent CIL Regulations tests in EN-1 paragraphs 4.1.16-4.1.18 which include necessity.

Item No.	ExA Description	Applicant's Response
		The question then becomes how in landscape terms can the level of offsetting be identified and (given it can by definition have no impact on the actual harm caused by the Project -for then it would be mitigation) the extent to which an applicant could find it appropriate to offer or a decision maker to formally require. It would be necessary to establish that harm to landscape at location A was required to be offset by a different landscape benefit to location B, when that benefit had no impact on the harm created by the project, and when it is now accepted that not ALL of the residual harm should be offset. It is precisely the unworkability of this exercise which means that it is not even contemplated in the landscape section of EN-5 and why there is no policy requirement for landscape impact offsetting when compared to the requirements for habitat, designated landscape furthering the purposes and tree loss compensation. It is also why no other overhead line DCO made to date has required offsetting landscape provision which is not mitigatory in nature. Notwithstanding all these matters, the Applicant has explored with the Local Planning Authorities (LPAs), entirely without prejudice to its main contentions relating to the need for landscape compensation, the potential for additional opportunities and measures which would fall into the offsetting and compensation category, if the Secretary of State, consider that these measures are necessary in the legal and policy sense set out above. Therefore, the Applicant and the relevant local authorities are in the process of identifying a potential mechanism to achieving such further offsetting on a "blue pencil basis" (see Applicant's response to ISH4 Action Point 2 in this document), even though again for clarity it does not consider that it is legally required under EN-1 and EN-5 or that it is necessary in the Newbury sense set out above. Applicant's Comments on Matters Raised by IPs The Applicant said it would respond in writing to Suffolk and Essex County Council (SCC) point suggesting that 'as far as possible' was a planning judgement that needs to be made on a case-by-case basis. Yes, there would be a planning judgment involved generally but that planning judgment would also require a consideration of necessity, proportionality and direct relationship with the Project and reasonableness if it is to be secured by requirements or s106 agreement or

Item No.	ExA Description	Applicant's Response
		equivalent mechanism. It now appears to be accepted that compensation for inevitable landscape impact of pylons is NOT a necessity. Unlike woodland replacement or furthering the purposes of designated landscapes or habitat replacement it is not specifically required by policy or law. So, the question is whether the consent should be refused without it in the circumstances of this case. The Applicant is of the view that it is not required in order to consent the Project and that further providing landscape enhancements unconnected with the harms associated with the project also fails the directly related to the Project test. Provision of landscape benefits away from the Order Limits would be by definition likely be an offset unconnected with the Project except that it would (under the LPAs proposal) be funded by the Applicant. Proportionality would also include the consequential and precedential elements of requiring non mitigatory offsetting of landscaping impacts on other infrastructure projects because it could apply to other projects. This would have significant and unintended consequences for the cost of electricity and to the duties of the Applicant as a statutory undertaker under Schedule 9 of the Electricity Act. Suffolk County Council, Essex County Council, Babergh and Mid-Suffolk DC, Villages Against Pylons and Pylons East Anglia made various oral submissions. The Applicant considers these have been addressed through its response above.
5.1b	Compensation and the mitigation hierarchy Is there an argument that, while compensation doesn't remove or alter adverse effects, that it may be capable of offsetting it?	Oral Summary of the Applicant's Case The Applicant noted that in theory that is correct, but the Applicant maintains that it does not consider that compensation is required for the particular landscaping impact of EN-5 infrastructure, as concluded on Bramford to Twinstead DCO and for the reasons outlined above. Applicant's Comments on Matters Raised by IPs In response to SCC's comment that Bramford to Twinstead DCO was case specific and not a generic principle, the Applicant agrees that every case is determined on its merits, but if one looks at the way that it is framed in the separate parts of the Bramford to Twinstead DCO Examiner's Report, they record, identify, and then summarise their conclusions based on the legal submissions which deliberately

Item No.	ExA Description	Applicant's Response
		reflect those made by the Applicant (and Mr Bedford KC) in that case. See BTNO 3.9.142 et seq and the hyperlinks to the detailed legal submissions. They rejected Mr Bedfords submissions and concluded that Compensation was as a matter of principle to be treated differently to other elements of the mitigation hierarchy and that wider compensation schemes were not seen to meet the tests of proportionality. They were correct. The mitigation hierarchy does not require the applicant to remove all harmful effects of infrastructure. Indeed, the EN suite proceeds on the basis that there is an expectation of significant residual effects after the application of the mitigation hierarchy. "It will not be possible to develop the necessary amount of new large-scale energy infrastructure without some significant adverse impacts" 3.1.2EN-1. It follows that Government cannot take the view that all impacts of a proposal require to be mitigated or offset. Landscape impacts of pylons are likely to have impacts that are not wholly mitigatable and that is recognised by the EN suite. Offsetting cannot reduce that level of unmitigated harm. Rather it is a benefit elsewhere which by definition has and can have no impact on the identified residual harm. It is the level of residual harm which frames the planning balance between the benefits of a CNP proposal and that residual harm. This is a matter of principle. In order to be secured by a requirement or other mechanism or to be taken into account such an offset benefit would have to be shown to be truly necessary, proportionate, directly related to the development and reasonable in all respects. The BTNO panel and the Secretary of State clearly understood this legal position.
5.1c	Compensation and the mitigation hierarchy Please can the Applicant explain the proposed section 106 (s106) process	The Applicant notwithstanding the above wrote to all the LPAs along the route on 31 March 2026 and again on 1 May 2026, inviting them to provide a better understanding of the compensation/enhancements that were set out in their relevant responses and the Local Impact Reports. The Applicant has produced draft masterplans based on these proposals provided in 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans. The Applicant has had positive discussions with SCC and Babergh and Mid Suffolk District Council around the Bramford area. This has helped frame the discussions with other local authorities, which is based on supporting the existing landscape

Item No.	ExA Description	Applicant's Response
		fabric, through additional hedgerow planting and infilling of gaps in hedgerows and improving connectivity for ecology. There appears to be a broad agreement to the approach between the parties. The host LPAs have produced a first draft, outline s106 agreement, which the Applicant received on 18th June and is currently reviewing. Under the s106, if the Secretary of State considers the measures to be appropriate and necessary, then the Applicant would make a payment to the relevant LPAs, then each LPA would deliver the offsetting measures considered to be appropriate in the particular circumstances within its local authority area based on the specific locations identified. Some areas in the draft s106 have been set out quite explicitly, other areas have less detail provided, so that is where the discussions need to focus to establish agreed positions. There are likely to be schedules and costings set out for the different locations shown on the masterplans. The Applicant is exploring what funding arrangements may be required having received costs from Norfolk, Suffolk and Essex County Councils of what this would mean in specific locations along the route and also the criteria attached to these as to how the offset measures would be delivered. The Applicant is considering draft Heads of Terms and is looking at the Examination timetable considering how such an agreement or other mechanism in the DCO can be brought forward with the relevant local authorities in the time available. Applicant's Comments on Matters Raised by IPs In response to SCC's suggestion of these potentially being delivered as a Requirement, the Applicant said it will look at any alternative mechanisms proposed by the LPA. A requirement, for a scheme to be submitted and approved by the LPA with the Heads of Terms identified could be a useful alternative but the Applicant will respond in writing (see Applicant's response to Action Point 2 below). Action Point 1: Provide an update on the progress of the draft section 106 agreement regarding landscape enhancement

Item No.	ExA Description	Applicant's Response
		The Applicant submitted 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199] at Deadline 5 in response to Action Point 27 from Issue Specific Hearing 2 (ISH2) [EV9-023]. The engagement undertaken in relation to this matter was set out within that submission. Discussions have continued since then, both informally around the hearing process with host authorities represented in person and through dedicated engagement. Most recently, the Applicant met with Essex County Council on 26 June 2026. On 18 June 2026, the Applicant received a draft copy of an outline s106 submitted on behalf of all the host local authorities. The draft agreement included a schedule relating to location specific compensation measures, although the level of detail provided for every varied significantly. The draft agreement sought financial contributions from the Applicant to be administered by the relevant county-tier authority to support improvements and engagement activities within these locations. The Applicant has therefore progressed with negotiations on this basis without prejudice to its stated position on the need for such compensation. The Applicant understands the ExA's request as requiring consideration of an appropriate legal mechanism to secure location specific compensation measures for the specific areas covered by 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]. In response, the Applicant has shared details of a proposed financial offer for each area with the relevant county councils and Thurrock Council. Alongside information relating to the geographical extent of the proposed funding, the Applicant has also provided draft eligibility criteria intended to ensure that any measures delivered are appropriate, proportionate, and policy compliant (in the context where the Secretary of State determines that the provision of compensation is to be required). The Applicant has sought to establish meetings with the relevant local authorities to progress discussions and seek agreement on both the scope of the measures and the legal mechanism required to secure them. In accordance with the ExA's request and discussions at ISH4, the Applicant has considered alternative mechanisms for securing the proposed compensation measures should it not be possible to finalise a s106 or other legal agreement

Item No.	ExA Description	Applicant's Response
		before the close of the Examination. Details have been provided in response to Action Point 2 of ISH4 within this document.
5.1d	Compensation and the mitigation hierarchy Mechanism for delivery of offsetting if this was considered necessary.	Oral Summary of the Applicant's Case Notwithstanding its position that the Applicant does not consider that offsetting is necessary, the Applicant is in discussions with the LPAs to discuss a mechanism as to how such measures could be implemented, should the ExA and/or the SoS consider it to be necessary. The Applicant has approached all LPAs and had responses from a number of these, along with a proposed draft s106 agreement from the host LPAs, which it is currently being reviewed. The mechanism proposed in the host LPAs' draft s106 comprises the Applicant providing a payment to the LPAs, which they would put towards the offsetting works that they consider to be appropriate in their council area. The Applicant noted that although a s106 has been shared by the LPAs in draft form, other mechanisms may be appropriate and/or sufficient. Action Point 2: Provide a draft requirement (agreed where possible with all local authorities) relating to submission of a scheme for landscape enhancement in the event that a completed (signed and dated) legal agreement is not submitted before the end of the examination. The Applicant prior to ISH4, received on 18 June 2026 an outline draft s106 agreement from the host local authorities. The draft agreement included a schedule relating to the provision of funding by the Applicant for landscape compensation, offsetting and enhancement at specified locations that have been under consideration during the Examination (see for example 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]). The Applicant's position is that compensation for residual landscape and visual effects is not required pursuant to the legal and policy framework (please see 5.1a of this document). Without prejudice to that position, pursuant to ISH4 Action Point 2, the Applicant has produced a draft DCO Article and provisions (contained at Annex A) containing commitments to provide funding to the local authorities for provision of landscape compensation in the vicinity of the specified locations that were considered

Item No.	ExA Description	Applicant's Response
		pursuant to ISH2 Action Point 27. It is intended that the draft DCO provisions will be produced in the draft DCO at Deadline 7 on a "blue pencil basis" i.e. it will be left as a matter for the SoS to determine whether imposing a DCO commitment on the Applicant to provide funds for landscape compensation is in accordance with the legal framework and policy, including the tests in paragraphs 4.1.6 - 4.1.8 of EN-1 (2024) which are considered to be applicable. The draft DCO mechanism is broadly based on the draft section 106 schedule produced on behalf of the host local authorities. Certain details including the geographical areas within which the measures should be provided, and the amount of the financial contributions are still to be agreed. The parties will continue to engage between Deadline 6 and Deadline 7. The mechanism of the proposed Article and DCO provisions would be in accordance with section 120 Planning Act 2008 and Schedule 5 (paragraph 35). The Applicant considers that an Article could be a more efficient legal mechanism for securing the commitment than a separate legal agreement and avoids the need for a multi-party agreement or unilateral undertakings pursuant to section 106 Town and Country Planning Act 1990 or a multi-party agreement pursuant to section 111 Local Government Act 1972. It is noted that Article 54 of The London Luton Airport Expansion Development Consent Order 2025 provided for a payment of a financial contribution towards meeting the section 85 Countryside and Rights of Way Act 2000 duty to seek to further the purposes. The Applicant has already provided the draft DCO Article and provisions to the relevant local authorities directly and will take forward further discussions before Deadline 7. Post Hearing Update The Applicant noted the comments made by ECC about the masterplans being a starting point and has welcomed the positive engagement with the Council on the location specific compensation measures. The Applicant had a meeting with ECC on 26 June 2026 to discuss the spreadsheet the Council had provided, and the location specific compensation opportunities plans identified in 8.4.12.2 Response

Item No.	ExA Description	Applicant's Response
		to ISH2 Action Point 27 – Masterplans [REP5-199] and is continuing this engagement. In response to SCC's comments regarding offsite tree planting resulting from the 3:1 commitment for individual trees. The Applicant will prioritise the replanting of trees within the Order Limits, the quantum of any offsite provision of trees will not be determined until Requirement 8 (Retention and removal of trees, woodland and hedgerows) and Requirement 9 (Reinstatement planting plan) have been discharged. The Applicant will provide an Offsite Planting Delivery Scheme to the relevant local planning authorities which will identify the quantum of offsite tree planting to be delivered, identify an approach to delivery and site selection criteria, identify (where appropriate) locations for offsite planting or alternatively details of organisations which shall deliver the planting, and identify proposed timings for delivery. The Applicant provided 8.28 Outline Offsite Planting Delivery Scheme [Revision A] at Deadline 6 which includes site selection criteria which will be considered to ensure the benefits from offsite planting are maximised.
5.1e	Compensation and the mitigation hierarchy In terms of the proposals that are being discussed with the council, are they being put forward in any event? If our recommendation and the Secretary of State's decision decides that the s106 isn't required, then what happens to those provisions within the s106? Do none of them get carried out, or is there no funding available for them?	Oral Summary of the Applicant's Case The generalised position is, if the SoS thinks that these measures are not necessary, then they would, as a matter of law, applying the CIL Regulations equivalent tests in EN-1 paragraphs 4.1.16- 4.1.18, not have regard to them. In such a case the Applicant, who has a duty to be economic and efficient under Schedule 9 of the Electricity Act 1989 would not be spending millions of pounds on what the SoS thinks is not necessary. Every complex s106 in the planning world is now accompanied by a provision which says, 'If the decision maker thinks it is not necessary, then it will not be taken into account', and therefore is ordinarily not then continued with by the applicant. If there are certain elements that the council identify as compensation which is truly regarded as necessary (because for example it could be said to be necessary mitigation) the Applicant will consider this, but we should not, as a matter of law, be offering more than is required to the grant of planning permission. Measures must meet the tests, for example if you looked at a s106 it would be a stretch to say that planting which is several miles away from the Project passes the tests of necessity,

Item No.	ExA Description	Applicant's Response
		related to the development and proportionality. We are engaging in good faith, and when you see the s106/legal mechanism (precise form of which is still under consideration), the ExA or SoS may find that none of the measures are necessary, or that some pass the test, but others don't, and in those circumstances, the mechanism will be flexible enough to allow that to happen. Applicant's Comments on Matters Raised by IPs In response to SCC comment that the ExA should make it clear during Examination what their thoughts on the necessity of the measures are, the Applicant does not consider this to be the right thing to do, as it would be a matter for the SoS based on their interpretation of EN-1 and EN-5. The Applicant confirms that its engagement with the LPAs on this matter is not going to be tempered by a conditional ruling made in advance of the SoS's decision. Post Hearing Update The Applicant is continuing to engage with the relevant LPAs on the offsetting/compensatory measures and has provided an updated in response to Action Point 1 in this document.
5.1f	Compensation and the mitigation hierarchy Given there are only 6.5 weeks left of Examination what will happen if this is not agreed by the parties by the end of Examination?	Oral Summary of the Applicant's Case The Applicant is engaging with the local authorities as intensively as possible. If it cannot get a multilateral agreement agreed by the end of Examination, then it will potentially include as many of the provisions of a multilateral that have been agreed, and others down to its judgment, into a unilateral or other mechanism. It also has the potential for a requirement which secures the submission of a scheme to the LPAs, which can be considered and determined at a future point. The decision as to whether landscape offsetting away from the project is necessary to the grant of the DCO will be a matter for the Minister as a matter of law. It would be premature and inappropriate for the ExA to have a finalised view on this and to state that during the Examination as SCC suggested. The Applicant has provided a mechanism to secure offsite offsetting as asked and will continue to work with the Councils in good faith and in a proactive manner.

Item No.	ExA Description	Applicant's Response
		Post Hearing Update The Applicant has provided draft wording for a DCO Article to secure the location specific compensation measures in response to Action Point 2 above. The draft has been shared with the LPAs for comment.
5.1g	Masterplans [REP5-199] Where did the potential opportunities shown on the Masterplans come from?	Oral Summary of the Applicant's Case The Applicant sought the LPAs input at locations cited in ExQ1 LV1.28, discussed and considered opportunities that might exist through the local plans as indicated in their relevant response and Local Impact Reports. Landscape Character Areas were considered alongside Local Nature Recovery Strategies (LNRs), the latter having recently been consulted upon and mapped to show opportunities for woodland, hedgerow and grassland opportunities considered desirable locally. The Applicant developed the masterplans (constraints and opportunities plans) circulated those plans to the relevant LPAs for comment, had follow up discussions with some authorities as time allowed, before finally publishing them in 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]. Post Hearing Update In response to Mr Micklem from Langley's Estate and Burstall Parish Council who noted that landowners and local residents should be engaged in developing the opportunities as they know the local landscape and what is required. The Applicant would like to clarify that the opportunities plans in 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199] are in draft and illustrative in nature. They were drafted in response to an Action Point from the ExA set during ISH2 and therefore were provided in a limited timeframe. The Applicant did however engage the relevant LPAs and seek to align the opportunities identified with the LNRs which is a result of a collaborative effort involving multiple stakeholders. A possible delivery mechanism highlighted by the LPAs in their draft s106 is the provision of a financial contribution to the LPAs to deliver compensatory measures. There is therefore potential for local input during this delivery process. In response to Mr Micklem, who noted that the Great and Little Waltham opportunities plan in 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199] illustrates

Item No.	ExA Description	Applicant's Response
		opportunities where there are existing hedgerows and where vegetation is to be removed as part of the Project, the Applicant would again like to clarify that the plans are in draft and are necessarily illustrative in nature. The plans identify strategic opportunities rather than a detailed design. As noted in Section 2.6 of [REP5-199], any schemes put forward would need to be provided on a voluntary basis and agreed with the relevant landowners.
5.1h	Masterplans [REP5-199] Would the enhancement opportunities potentially create local landscape benefit and therefore, at a local landscape level, would have a positive effect on that landscape?	Oral Summary of the Applicant's Case The Applicant confirmed that in that context alone, it is fair to say they would. The Applicant repeated that any benefit would have to be necessary, proportionate directly related to the development and reasonable.
5.1i	Offsite planting delivery schemes For the three to one calculation, that's 300 mature oak trees and tens of metres of hedgerow that need to be put back in Ardleigh as close to the site as possible. Is that possible and how far away is off-site?	Oral Summary of the Applicant's Case The Applicant said it would respond in writing. Post Hearing Update Individual trees will be subject to the 3:1 commitment whereas larger groups and woodlands have been assessed and mitigated through the BNG metric and captured in 7.1 Biodiversity Net Gain Report [APP-299]. The Applicant has committed to prioritise tree replanting within the Order Limits seeking to, where practicable, replant trees within the same location, or if constraints preclude this, planting will be undertaken as close as possible to the original location. If offsite tree planting is required, the Applicant will seek to achieve a proportionate distribution across the areas affected by the Project. It is not possible at this stage to state the exact location where the planting would be undertaken as any offsite provision will only be identified once Requirements 8 (Retention and removal of trees, woodlands and hedgerows) the Reinstatement Planting Plans under Requirement 9 (Reinstatement planting plan) are discharged with the relevant Local Planning Authority. In 8.28 Outline Offsite Planting Delivery Scheme [Revision A] the Applicant has however included proximity to Order Limits and seeking to

Item No.	ExA Description	Applicant's Response
		achieve a distribution across the areas as criteria for consideration during delivery of the offsite planting.
5.1j	Offsite planting delivery schemes Ardleigh Parish Council asked whether the biodiversity net gain costs had been calculated yet and is this factored into the cost of the project? What is the true cost of BNG across the whole of the project.	Oral Summary of the Applicant's Case The Applicant said it would respond in writing. Post Hearing Update The Applicant is confident that the process it follows to identify and then assess potential options is robust and the most appropriate. Many different factors are considered when determining which options to progress including technical, environmental, cost and feedback from consultation. This has been tried and tested through numerous previous projects, the formal Examination process and ultimately decided by the relevant Secretary of State. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG), for development (subject to certain exemptions); however, this requirement is not yet in force for NSIPs. Despite submitting the application for development consent before it is mandatory, the Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. In line with NPS EN-1 paragraph 4.6.13 and the Applicant's commitment to deliver 10% BNG with wider environmental and societal benefits, during the offsite site selection process, the Applicant will consider BNG sites that provide wider environmental and societal benefits as stated within 7.1 Biodiversity Net Gain Report [APP-299]. The delivery of BNG will incur costs, including onsite habitat creation and enhancement, long term management, monitoring and the acquisition of offsite biodiversity units. At this stage, it is not possible to provide a definitive project wide cost for BNG, as the final cost will depend on detailed design, the final BNG metric calculations, the extent of BNG delivered on site, market value of any offsite units required and other possible factors. The Applicant is satisfied that appropriate provision has been made within the project's cost estimates to enable compliance with the BNG commitments.
5.1k	Offsite planting delivery schemes	Oral Summary of the Applicant's Case

Item No.	ExA Description	Applicant's Response
	North West and South West of Chelmsford Parishes Group asked if the Applicant can provide the cost for an additional 1.36km of overhead line at the Walthams because then that could be compared with the various costings that are going to come out of the s106 agreements? Noting that the alternative option proposed would avoid a lot of the need for compensatory planting.	The Applicant said it would respond in writing. Post Hearing Update The Applicant disagrees with the Parishes Group's analysis and premise for seeking the costs. The Parishes Groups preference for an eastern route around Chelmsford is not deliverable due to technical constraints and the Applicant's position is that the submitted DCO route is consistent with relevant Policy. In line with normal down-selection processes, the proposed alternative route was not progressed after careful consideration. It has not been subject to the same level of detailed assessment and stakeholder engagement as the Project alignment. The Applicant's position is that the Parishes Group is incorrect in its assumption that the alternative route would necessarily avoid a similar request for compensatory or enhancement measures. To reach such a conclusion would require a full assessment of the alternative route's environmental effects and mitigation requirements which has not been carried out. In the absence of this work, the Applicant does not see it as appropriate or having meaningful purpose to provide any such cost estimate.
5.1l	Offsite planting delivery schemes Pylons East Anglia noted that the masterplans show opportunities for green connectivity in areas which already have got green connectivity.	Oral Summary of the Applicant's Case The Applicant said it would respond in writing. Post Hearing Update As noted under Item 5.1g, the plans in 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199] are in draft and are necessarily illustrative in nature. The plans identify strategic opportunities rather than a detailed design. Opportunities may exist to enhance existing green infrastructure networks.
5.1m	Offsite planting delivery schemes Please can the Applicant talk through the off-site planting delivery scheme and how that will be engaged and enforced.	Oral Summary of the Applicant's Case The Applicant has drafted a unilateral undertaking, which secures the production of an offsite delivery planting scheme. The Heads of Terms were shared with LPAs in October 2025, and the detailed agreement shared with the LPAs more recently for their further comment.

Item No.	ExA Description	Applicant's Response
		The Applicant has made a commitment to put back a ratio of 3:1 in terms of replacement tree planting for individual trees. This would be delivered within the Order Limits where it can, but due to limitations and restrictions associated with certain planting over cables and beneath overhead lines, it may be necessary to undertake planting offsite to meet this commitment. The Applicant is currently retaining flexibility over how that is done so it is delivered in the best possible way. It could for example be via a direct provision, through a grant-based scheme or through an agreement with another organisation working in the area. The Offsite Planting Delivery Scheme will identify the quantum of trees necessary offsite but only once Requirements 8 and 9 have been discharged. The scheme will set out how the Applicant will identify the site selection criteria and the timeframes for delivery. The unilateral undertaking states that the Applicant would provide a verification/completion report that confirms that the planting was delivered. The Applicant notes that IPs have requested additional information to be included and it is looking to submit an Outline Offsite Planting Delivery Scheme at the next deadline to set out the framework, establishing the principles, process and criteria by which any offsite replacement tree planting requirement will be identified and delivered. There will also be a final offsite delivery scheme provided to the LPAs, which will be an extension of the outline document. Post Hearing Update Whilst the Application originally proposed a s106 unilateral undertaking to secure offsite tree planting subject to the 3:1 commitment, following further consideration the Applicant is proposing to secure these measures through 3.1 draft DCO [Revision F] in the form of requirements. 3.1 Draft DCO [Revision F] was updated at Deadline 6 to reflect this change. Action Point 3: Provide details of an outline offsite planting scheme to provide a framework prior to the submission of a unilateral undertaking which would secure such a scheme.

Item No.	ExA Description	Applicant's Response
		The Applicant has provided 8.28 Outline Offsite Planting Delivery Scheme [Revision A] at Deadline 6.
5.1n	Offsite planting delivery schemes Will the unilateral also contain provisions for aftercare and issues such as provenance of native species?	Oral Summary of the Applicant's Case The unilateral commits the Applicant to using reasonable endeavours to provide a five-year aftercare period. This would be dependent on how the planting is delivered, so it could be secured for example through a voluntary agreement with the landowner or through a condition on the grant funding. In terms of the provenance of native species, the Applicant has made a commitment to use locally appropriate species, and this will be included in the Outline Offsite Planting Delivery Scheme. Post Hearing Update The Applicant has reviewed the approach to securing the Offsite Planting Delivery Scheme and has proposed additional wording as part of Requirement 9 of the Draft DCO [Revision F] to secure this document. The commitment in relation to the aftercare is set out in 8.28 Outline Offsite Planting Delivery Scheme [Revision A], the requirement wording ensures that the final Offsite Planting Delivery Scheme is prepared substantially in accordance with the outline document.
5.1o	Offsite planting delivery schemes This relies on the landowners where you would site the off-site planting area, so is progress being made in those areas, too?	The Applicant has not spoken directly to all landowners to identify specific locations for offsite tree planting. The commitment is to put back three trees for every one individual tree removed, with replacement planting prioritised onsite. The quantum of trees subject to the commitment will not be known until detailed designs are complete and the specific removal is known, in line with Requirement 8. It will only be at this stage, that it will be identified how much planting is needed and whether this can be delivered onsite or whether offsite provision is needed. In addition, the Applicant is looking to retain flexibility on how that is delivered and it could be through a grant-based programme for example. Therefore, the Applicant cannot have specific discussions with landowners until the quantum has been confirmed.
5.1p	Monitoring	Oral Summary of the Applicant's Case

Item No.	ExA Description	Applicant's Response
	The majority of the planting that takes place will be subject to a five-year aftercare period. Given the impacts of climate change in East Anglia and the widespread landscape and visual impacts of the scheme, is this time period enough, and could a more adaptive approach be pursued depending on the sensitivity of the specific areas along the route and the importance of the landscape planting as mitigation?	The Applicant considers the five-year aftercare period to be sufficient, as set out in its previous representations. In terms of the adaptive nature, 7.4 Outline Landscape and Ecological Management Plan [Revision F] includes a commitment to providing an adaptive element to the management in the five-year period. This means that the Applicant would review the monitoring and provide adaptive measures as appropriate, albeit the adaptive nature of the aftercare does not include extending the time period beyond the five years. It is important to note that the mitigation areas for the permanent infrastructure of the substations and cable sealing end compounds where Environmental Areas are proposed are all covered by the 30-year aftercare commitment. It is the reinstatement planting (outside the Environmental Areas) that falls within the five-year period commitment. It is also important to acknowledge that the aftercare would not stop after the five years, this is just where the Applicant's commitment would stop. After five years the maintenance would be undertaken by the landowner, as per their current maintenance routine. Action Point 5: Provide a written response regarding an adaptive approach to the standard five year time period for reinstatement of failed planting to take account of factors such as location and local conditions. 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. The proposed aftercare measures will be adaptive to reflect the results of the ongoing monitoring of new tree/hedgerow planting. The following measures, identified in 7.4 Outline Landscape and Ecological Management Plan [Revision F], will ensure that the aftercare takes account of local conditions, including the potential for lower than average rainfall levels across the Project: • Paragraph 10.2.1, bullet 2: <i>Replace any dead or failing plants in the first available planting season with a specimen of the same species and size as that originally planted, unless there are context specific reasons for selecting alternative species (such as climatic conditions or disease). Locally native</i>

Item No.	ExA Description	Applicant's Response
		<i>species and/or those suited to drier conditions (with reference to Forestry England) will be considered</i> Paragraph 10.2.1, bullet 10: <i>Water new plants as required to minimise failures during drought, during the five-year aftercare period. All newly planted trees with a trunk diameter of 6 cm or more will be watered, if conditions require it and where practical, with monitoring of this requirement typically extending over three years. Measures could include using a buried watering tube, irrigation bag or irrigation well, where this is practical, for example in areas where there is road access for a bowser</i>
5.1q	Monitoring It is well documented on the new section of the A14 between Cambridge and Huntingdon that a lot of the planting has been largely unsuccessful and National Highways is about to replant lots of trees. As the Norwich to Tilbury project has a similar climate, is the maintenance period still sufficient?	Oral Summary of the Applicant's Case The Applicant stated that it would respond to the comments raised about the new planting on the A14 in writing. The Applicant noted that SCC, Pylons East Anglia and Mr Micklem who echoed this concern and suggested that an outcome focus could be preferable to a time-based commitment. The Applicant agreed to respond further in writing. Post Hearing Update A14 Cambridge to Huntingdon Improvement Scheme The A14 Cambridge to Huntingdon Improvement Scheme was delivered by National Highways to address congestion, safety issues and strategic connectivity on a nationally important route between the eastern ports, the Midlands and the north of England. The scheme included a major new bypass south of Huntingdon and upgrades to approximately 21 miles of the A14 corridor and opened in 2020. The scheme included large-scale landscape planting, with more than 860,000 trees and shrubs planted. This reportedly included more than 40 native tree and shrub species planting between 2018 and 2020 at a replacement ratio of approximately two to one. The stated purpose of the planting was multi-functional, intended to compensate for vegetation loss, provide visual screening, reduce landscape and community impacts, strengthen ecological connectivity, guide wildlife towards safe crossing points, and contribute to the predicted biodiversity net gain.

Item No.	ExA Description	Applicant's Response
		Up to 30% of the first tranche of saplings planting along the A14 died, although all were replanted. In 2023, a senior project manager at National Highways confirmed that this was partly because their planting took place in the spring, which was not optimal time after there was a need to open the road early. National Highways subsequently committed to replacement planting, around 165,000 trees and shrubs were planting between October 2023 and April 2024, avoiding potentially dry summer periods¹, later reporting stated that 90% of the replacement planting had survived. In 2026, National Highways announced a 50,000 tree trial to test new measures and inform future planting regimes². Whilst the timing of the planting was identified as an affecting factor, the reported causes were not attributable to a single issue. National Highways (and related reporting) identified poor soil, extreme heat, unsuitable planting stock and weaknesses in aftercare as contributing factors as well. The revised strategy reportedly incorporated lessons learnt, including improved ground preparation, enhanced aftercare, increased mulching to retain water, better tree guards, improved topsoil, and a review of species type and sapling age. The soil issue is particularly important as major highway schemes usually involve extensive earthworks, embankments, cuttings, borrow pits, stockpiling and soil handling. If soil structure, nutrients, compaction, drainage and organic matter are not properly protected or restored, planting may be installed into conditions that are biologically poor and soil bulk densities not compatible with tree root growth. The Applicant has committed to undertaking planting in winter, and as far as practicable, avoiding periods of frost, drought or other inclement weather as detailed in section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] which addresses the issues faced by National Highways as a result of the timing of the planting. Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] provides detail in relation to the aftercare measures including matters such as mulch/mulch matting, tree guards and species selection which includes the consideration of climatic conditions. The Applicant has also provided an Outline Soil

¹ UK Parliament Written Questions, Answers and Statements (2023) *A14: Tree Planting*

² BBC News (2026) *A14 tree planting not good enough, says body*. Available from <https://www.bbc.co.uk/news/articles/cedexg4nllvo>

Item No.	ExA Description	Applicant's Response
		Resource Plan (Appendix C of 7.2 Outline Code of Construction Practice [Revision F] which includes measures to ensure the effective management of the soil resource through the construction process to maintain good soil quality. It is therefore considered that the Project has incorporated appropriate measures where possible to help prevent the issues faced by National Highways being replicated. Justification for Five-year Aftercare The Applicant maintains the position that a five-year aftercare period for replacement planting is considered sufficient to ensure successful planting establishment across the Project. Replacement planting will be undertaken across the Project, in areas where impacts on habitats occur as a result of temporary activities. On completion of the construction works, habitats will be returned to the baseline habitat type and condition³, before being returned to the landowner. After the proposed five-year aftercare period, the planting would be managed by the relevant landowner, as currently takes place in respect of the existing vegetation, such as hedgerows, on private land. The only exception to this five-year monitoring and management period will be at the identified 'Environmental Areas', located on land to be acquired by National Grid around the substations and cable sealing end (CSE) compounds. Any habitats to be created or enhanced within the Environmental Areas, will be monitored and managed by National Grid for 30 years. This is in line with the commitments made in the Biodiversity Net Gain (BNG) Report and monitoring and management obligations in section 3 of 7.1 Biodiversity Net Gain Report [APP-299]. <u>Good Practice</u> The Project follows good practice as set out within Section 11.2 of British Standard (BS) 8545:2014+A1:2026⁴ which states: '<i>Post-planting management and maintenance is important if longevity in the landscape is to be achieved. A full</i>

³ Note, tall trees cannot be replanted directly beneath or within prescribed distances of the proposed overhead line (due to electrical clearance requirements) or above the proposed underground cables.

⁴ British Standard (2026) BS 8545:2014+A1:2026 Trees from nursery to independence in the landscape – Code of Practice

Item No.	ExA Description	Applicant's Response
		<i>young tree management programme with budgetary provision should be in place for all planting schemes. This management programme should be in place for at least 5 years.'</i> The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard to achieve independence in the landscape. Five years is also the suggested length of time for a landscape maintenance contract as recommended in the Landscape Institute's JCLI Landscape Maintenance Works Contract⁵. 7.4 Outline Landscape and Ecological Management Plan [Revision F] states that the planting will be undertaken by suitably experienced contractors in line with British Standards and follow general good practice principles outlined in Section 9.2 of 7.4 Outline Landscape and Ecological and Management Plan [Revision F]. The following guidance also supports the Project's approach: • The most recent Tree Council guidance 'Caring for newly planted trees'⁶ which has been produced with National Highways refers to a five-year establishment phase • Government guidance 'Maintain new trees after restocking'⁷ provides advice regarding looking after newly planting trees in areas where restocking due to pests and disease is required within the first 5 years. It is important to note that there is a difference between the aftercare period required for successful establishment of planting, and the longer-term maintenance period, which is likely to be ongoing beyond this point, by the relevant landowner. <u>Purpose of five-year aftercare</u> Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision F] contains details of aftercare including annual inspections,

⁵ Landscape Institute (2017) *JCLI Landscape Maintenance Works Contract 2017*

⁶ National Highways and the Tree Council (2025) *Caring for Newly Planted Trees*

⁷ Department for Environment, Food and Rural Affairs and Forestry Commission (2021) *Maintain New Trees after Restocking*

Item No.	ExA Description	Applicant's Response
		replacement of any dead or failing plants, mulching and watering. The proposed aftercare measures will be adaptive to reflect the results of the ongoing monitoring of new tree/hedgerow planting. This may include recommendations to use of alternative native tree/hedgerow species, should it be found during the aftercare period that a significant number of certain types of the original tree/hedgerow species used have failed, and are therefore considered unsuitable for the particular location. This will be determined by the Landscape Clerk of Works. The failure rate for native tree and shrub planting tends to fall off rapidly after the first c. 2–3 years, at which point most plants tend to be becoming well established, following recovery from the disturbance associated with their movement from the nursery and replanting at the site. The five-year period captures this initial establishment risk and by year 5, the success rates which have been achieved provide a realistic picture of long-term success. It is considered that the early establishment is a key determinant to later success. There are multiple factors which affect plant success, most of which influence success before, at, or up to shortly after the time of planting, rather than in the longer term. Therefore, the Applicant's position is that the five-year aftercare period being proposed as part of the Project is deemed sufficient to ensure successful plant establishment. As stated previously, the only exception to this five-year monitoring and management period will be at the identified 'Environmental Areas', located on land to be acquired by National Grid, around the substations and CSE compounds. Any habitats to be created or enhanced within the Environmental Areas, will be managed and monitored by National Grid for 30 years. This is in line with the Biodiversity Net Gain (BNG) monitoring and management obligations. <u>Site specific context and nature of planting</u> Tree planting will predominately be undertaken in rural areas where the existing nutrient status, available soil moisture, structure and soil bulk density, as well as depth is favourable for root extension growth and tree vitality. The Applicant considers that given the rural nature of the planting sites and anticipated successful establishment, the five-year aftercare period is sufficient for trees to achieve independence in the landscape. The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which,

Item No.	ExA Description	Applicant's Response
		as noted above, can be more determinative of success than the length of the aftercare period. 7.4 Outline Landscape and Ecological and Management Plan [Revision F] highlights some good practice principles, and these will be expanded upon with full details provided within the final Landscape and Ecological Management Plan(s), to be discharged in accordance with Requirement 4 of 3.1 Draft Development Consent Order [Revision F]. 7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324] gives an indication of likely species mixes, size, specification/habit, stock type and density of planting. Planting sizes and species will be selected based on those which would naturalise more easily than larger trees stock, for example mainly smaller, largely bare root whips and transplants, which are typically around 2-3 years old, and are therefore young and vigorous. This is normal practice when planting native trees and shrubs in rural environments. Suitable planting densities can be agreed through requirements, but those used for native trees and shrubs in a rural environment are typically quite high. This means that there will be a lot of plants used and reduces the chance that any failures which do occur beyond the five-year aftercare period (noting that this is unusual) will significantly affect the nature of the resulting woodlands or hedgerows that develop. Whilst 7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324] include indicative planting mixes for the Environmental Areas, the final details for which will be agreed under Requirement 4 and the final Landscape and Ecological Management Plan, planting schedules for the reinstatement planting would form part of a Reinstatement Planting Plan. Details of the onsite tree planting resulting from the 3:1 commitment in relation to individual trees and individual trees within small groups will be provided in accordance with Reinstatement Planting Plan(s) secured under Requirement 9 of 3.1 Draft Development Consent Order [Revision F]. <u>Adaptive aftercare</u> 7.4 Outline Landscape and Ecological Management Plan [Revision F] also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. The Applicant has committed to a five-year adaptive

Item No.	ExA Description	Applicant's Response
		aftercare period for reinstated woodland, trees and hedgerows as outlined in Section 10 of 7.4 Outline Landscape and Ecological Management Plan [Revision F]. This includes like-for-like replacement or consideration of alternative species based on site conditions and the reasons for failure. <u>Other NSIPs and Planting Schemes</u> Five years is considered to be a standard duration for aftercare of hedgerows and trees, as these are expected to have become well established during this period. Five years is typical for most large infrastructure projects. The five-year aftercare commitment proposed by the Project is in line with other previously consented National Grid Nationally Significant Infrastructure Projects such as Bramford to Twinstead Reinforcement Order 2024 and Yorkshire Green Energy Enablement Project Order 2024. The commitment is also in accordance with a number of other non-National Grid schemes including The East Anglia One Offshore Wind Farm Order 2014, The East Anglia Three Offshore Wind Farm Order 2017, The Norfolk Vanguard Offshore Wind Farm Order 2022, and The Norfolk Boreas Offshore Wind Farm Order 2021, where the default position has primarily been five years with the exception of around the substation/converter station sites. The A14 road scheme⁸ is an example where tree establishment has been low. This has been attributed to poor planting techniques, planting out of season (for bareroot tree stock) and inadequate aftercare. Additionally, many planting locations were on engineered embankments where the presence of compacted ground (due to the need for high soil strength, for engineering and soil stability reasons) is not compatible with the soil bulk densities and other conditions which are optimum for tree and shrub establishment. There are some other research projects which have considered aftercare. Research was completed on the Hadley Wood Hedgerow Trials project conducted

⁸ [A14 tree planting - why are they dying and how to fix it - BBC News](#)

Item No.	ExA Description	Applicant's Response
		by Network Rail in partnership with The Tree Council, Hadley Wood Rail User Group and Hadley Wood Association⁹. The key learnings so far reported are: • Sections planted with whips have been most successful and have formed an effective boundary around 3.5 m high • Whips planted by contractors, without supervision, had an average survival rate of 75% (thought to be due to inadequate planting depths and root exposure). Planting with the right knowledge and supervision delivered a higher survival rate of 94% • Good planting techniques are a significant factor in the establishment of young trees • By five years after planting hedgerow whips began producing flowers and fruits, supporting wildlife, indicating sexual maturity • A hedgerow can grow from seed within five years, but it is not as reliable as whip planting. It may offer a cheaper alternative to whip planting using contractors, but further research is needed to optimise the technique. These findings are consistent with established arboricultural research, which promotes the use of whips and small transplants. Research published by the Forestry Commission¹⁰ identified that smaller bare-root stock, including whips and transplants, retain a greater proportion of their root systems at lifting, resulting in improved root-to-shoot ratios, reduced moisture stress, and higher survival rates compared to larger stock such as half standards. Experimental evidence demonstrates significantly greater survival and growth performance in smaller stock, particularly for coarse-rooted species, where larger specimens are prone to dieback and establishment failure. Similarly, a broader review of studies published by the published by the Department for Forest Science, Texas A&M University¹¹,

⁹ The Tree Council (2026) The Hadley Wood Tree Trials available from <https://treecouncil.org.uk/science-and-research/hedgerows/hadley-wood/>

¹⁰ Hodge, S.J. (1991) *Amenity Tree Planting with Bare-root Stock*. Arboricultural Research Note 97/91. Farnham: Forestry Commission, Arboricultural Advisory and Information Service.

¹¹ Watson, W.T. (2005) 'Influence of tree size on transplant establishment and growth', HortTechnology, 15(1), pp. 118–122.

Item No.	ExA Description	Applicant's Response
		concludes that larger transplanted trees require substantially longer to re-establish functional root systems due to greater root loss, resulting in extended periods of transplant shock and reduced growth rates. In contrast, smaller trees establish more rapidly and can equal or surpass larger transplants in growth over time. Collectively, this evidence demonstrates that the use of whips represents a more reliable and effective approach to achieving successful and sustainable establishment. Tree and shrub planting on the Project will apply good practice and follow the guidance provided in BS 8545 for the successful establishment of trees, as well as the guidance provided in BS3936-1 1992. As a result of this, the Applicant considers that a five-year monitoring and management period for replacement planting is sufficient to ensure successful plant establishment. <u>Planting Delivery</u> 7.4 Outline Landscape and Ecological Management Plan [Revision F] commits to a range of measures to support the successful establishment of reinstatement planting which are outlined in Section 10. These include: • Reinstatement planting being undertaken in accordance with BS 8545:2014 and other relevant industry good practice • The appointment of suitably qualified and experienced contractors and specialist advisors to implement and oversee reinstatement and establishment works • Use of native species and locally appropriate planting stock selected to reflect local landscape character, ecological function and site conditions • Installation of tree protection measures, including guards and fencing where necessary, to protect young planting from browsing and grazing pressure during establishment • A five-year aftercare period for woodland, tree and hedgerow planting • Annual inspections of planting to assess establishment success and identify any requirement for replacement planting • Replacement of failed planting during the aftercare period

Item No.	ExA Description	Applicant's Response
		• Watering of newly planted trees where required to aid successful establishment • Application and maintenance of mulch and weed-control measures to reduce competition from surrounding vegetation • Adaptive management measures, including review of planting performance and implementation of additional establishment measures where required <u>Planting Failure</u> Requirement 9(7) (reinstatement planting plan) of 3.1 Draft Development Consent Order [Revision F] secures the replacement of any trees or hedgerows planted as part of an approved Reinstatement Planting Plan(s) that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. Any replacement planting provided under Requirement 9(7) will be subject to the same five-year monitoring period/replacement procedure as the original failed planting; the period will not re-commence. This is beneficial in that it will help introduce an element of diversity in the age of the developing vegetation, as would be typical in a more natural situation. An element of planting failure is part of natural plant variability even where good practice has been followed; the aim is to achieve healthy, high-quality established planting. <u>Landowners</u> At the end of the five-year aftercare period, the planting would be managed by the relevant landowner, as currently takes place in response of existing planting on private land. The purpose of the reinstatement planting is to replace what is removed, in order to maintain the existing baseline. Once the reinstatement planting is delivered and has been established through the five-year maintenance period, the purpose of the reinstatement planting has been achieved. It is the Applicant's view that there should be no additional obligation on the Applicant (or private landowners) to manage or maintain planting on private land which forms part of the wider baseline, in the same way as the Applicant (or private landowners) would not be obliged to maintain existing baseline planting which is not affected by the Project. There is also no justification for the Applicant to

Item No.	ExA Description	Applicant's Response
		permanently acquire land for the management of replacement planting in perpetuity or seek to agree long term management with a landowner, where that landowner would ordinarily be entitled to manage existing planting on their land as they consider appropriate. Management of replacement or mitigation planting following the five-year period is not considered directly related to the development or necessary on the basis that the planting required would have been delivered and its establishment secured, which is the purpose of the replacement planting. Response to SCC, Pylons East Anglia and Mr Micklem comments The Applicant noted that SCC's, Pylons East Anglia's and Mr Micklem's comments and suggested that an outcome focused commitment could be preferable to a time-based commitment. The Applicant considers the five-year aftercare period is appropriate and proportionate, a detailed justification for this period has been outlined above. The Applicant's position is that the appropriate mechanism is a five-year aftercare period supported by maintenance as outlined within 7.4 Outline Landscape and Ecological Management Plan [Revision F] and final Landscape and Ecological Management Plan(s), and monitoring and replacement planting where failures occur. Adaptive measures will also be undertaken as appropriate. This provides a robust and proportionate framework with the ability for the management to adapt and flex as appropriate. The need for flexibility needs to be balanced against the fact that requirements need to meet the relevant tests including being precise, enforceable and reasonable. The Applicant considers the five-year aftercare period is sufficient to ensure the successful establishment of reinstatement planting. The aftercare period is clear and enforceable providing clarity to both the Applicant and the local planning authorities. The imposition of an open-ended aftercare period with subjective outcome criteria would introduce uncertainty as to when the obligation ends, making it more difficult to administer, monitor and enforce, made even more challenging as a result of the number of different discharging authorities associated with the Project. It could also result in an open-ended maintenance requirement extending beyond what is reasonably necessary, even when the planting has already successfully established. This approach is considered disproportionate and unnecessary. As stated above, the Applicant must be mindful of the need to return the land temporarily impacted back

Item No.	ExA Description	Applicant's Response
		to the landowner. There is no justification for the Applicant to permanently acquire land for the management of replacement planting in perpetuity or seek to agree long term management with a landowner, where that landowner would ordinarily be entitled to manage existing planting on their land as they consider appropriate. The Applicant notes the request for a flexible approach to be taken to aftercare and has reflected this in the commitment for adaptive measures but for the reasons set out in the response to this agenda item maintains its position in relation to the adequacy of the five-year aftercare period.
5.2 The Colne Valley		
5.2a	The Planscape Landscape and Visual Technical Note [REP5 277] Please can the Applicant comment on the links between Colne Valley and Dedham Vale including whether it forms part of the setting?	Oral Summary of the Applicant's Case The Applicant does not agree with the Planscape Report that the Colne Valley is part of the setting of Dedham Vale National Landscape and notes that the Planscape report does not provide a setting study to support the assertion that the Colne Valley forms part of the setting. The Applicant has undertaken a setting study [Annex A of APP-255]. This identifies areas of the landscape where pylons may give rise to substantial impacts on the natural beauty and special qualities, in line with the Position Statement published by Dedham Vale National Landscape Partnership¹² in terms of considering impacts on setting. The Applicant notes that Natural England, as the statutory body in relation to National Landscapes, has raised no suggestions that the setting extends beyond that which the Applicant has identified and neither has the Dedham Vale National Landscape and Stour Valley Partnership raised concerns in terms of the Colne Valley. Part of the Stour Valley Project Area lying outside Dedham Vale National Landscape (away from the Norwich to Tilbury Project), is considered to form part of the setting as explained within the Bramford to Twinstead DCO. This is different to the Colne Valley because in 2013 the Dedham Vale National Landscape and Stour

¹² National Landscape Partnership (2024) *Development in the Setting of the Dedham Vale AONB Position Statement*

Item No.	ExA Description	Applicant's Response
		Valley Partnership specifically put forward part of the Stour Valley as a candidate site to extend the National Landscape. The Partnership had substantial evidence¹³ in terms of consideration of natural beauty criteria which apply when considering designating a National Landscape. The Norwich to Tilbury landscape consultant team has worked on projects that assess whether there is the potential for National Landscapes to be extended. Therefore, the team is familiar with the natural beauty criteria and the processes that need to be applied when identifying whether a landscape meets that requirement. The team does not consider that the Colne Valley comes close to meeting national designation status. The Applicant recognises the local value of the Colne Valley, and that is reflected in its assessment, and the Planscape Report broadly concurs with the Norwich to Tilbury Landscape and Visual Impact Assessment (LVIA). The Applicant noted a comparable term of 'particularly significant'. On Bramford to Twinstead DCO, effects on the part of the Stour Valley Project Area of a new 400kV overhead line could be considered to be particularly significant, because the area was considered to be of equal weight in terms of natural beauty as Dedham Vale National Landscape and also formed part of the setting. On the Norwich to Tilbury Project, there is an example where part of the Project was potentially particularly significant near Ardleigh. The initial proposals at this location included two overhead lines to the north of Ardleigh, and concerns were raised in terms of the potential for particularly significant effects in that location, which resulted in the Project committing to undergrounding one of the two overhead lines at this location. In terms of whether the Colne Valley carries the same weight as Dedham Vale National Landscape in terms of natural beauty, the Planscape Report states that the landscape does not necessarily contain rare or nationally unusual features; however, the combination and expression of landscape characteristics within the corridor do create a distinctive and locally important river valley landscape with a strong sense of place. The Applicant notes that the indicators of natural beauty in

¹³ Alison Farmer Associates (2016) *Special Qualities of the Dedham Vale AONB, Evaluation of Area Between Bures and Sudbury*

Item No.	ExA Description	Applicant's Response
		the Colne Valley are largely derived from the topography and from the natural heritage features that are typically associated with the core part of the river valley. Whilst the area demonstrates pockets of natural beauty, these are typically focused within the core area of the valley and are more diluted elsewhere. The Applicant agrees that the Colne Valley is of relatively high landscape value but as a result of the matters set out above takes the view that it does not strongly meet natural beauty criteria required of nationally designated landscape. As a result, the strong starting presumption should be that transmission by overhead lines is the appropriate route. The Applicant agreed to respond further in writing to expand upon the professional judgement that the Colne Valley does not carry the same weight as Dedham Vale National Landscape in terms of natural beauty.
		Post Hearing Update The Applicant has responded in writing within Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [Revision A].
5.2b	The Planscape report and the Landscape Partnership report both state that there is a reasonable evidential basis for further consideration of localised undergrounding as a means of reducing effects. Does this mean that the that the proposal would have particularly significant landscape and visual impacts on the Colne Valley and adjoining area of high landscape value and sensitivity and therefore, paragraph 2.9.14 of EN-5 would be highly relevant?	Oral Summary of the Applicant's Case The Applicant noted that neither of the studies engage with the wider EN-5 policy matrix for areas that are outside of designated landscape areas, and that gives rise to a particular test that the decision-maker has to have regard to and operate in those circumstances. EN-5 paragraphs 2.9.20 states the strong starting presumption for electricity networks in general, is for overhead lines. The presumption is only reversed in nationally designated landscapes as stated in paragraph 2.9.21 'In these areas [nationally designated landscapes], the strong starting presumption will be that the applicant should go underground'. Then in 2.9.23 – 'Additionally, there may be cases where a high potential for widespread and significant adverse landscape and or visual impacts along certain sections of the route <i>may</i> recommend the use of undergrounding'. This creates a strong presumption in areas outside of nationally designated landscapes in favour of overhead lines, and then it provides the

Item No.	ExA Description	Applicant's Response
		multilayered tests by which that presumption can exceptionally be overruled outside of a designated area. The first “gateway” test in paragraph 2.9.23 of EN-5 is “a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of the route”. Meeting this threshold of impact does not lead to the setting aside of the presumption in favour of overhead line, which can only be rebutted if the further tests set out in paragraph 2.9.24 and the other EN-5 paragraphs including 2.9.25 which states ‘In such cases, the Secretary of State should only grant development consent for underground or subsea sections of the proposal of 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, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable’. In this context, the Secretary of State is formally mandated to consider in reaching a decision the landscape and visual baseline characteristics, the additional cost of the proposed underground and the potential very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets. Therefore, the Applicant considers that there is a deliberately extensive test to be applied as a matter of law to rebut the strong presumption for overhead lines if the location of the overhead line is not part of a nationally designated landscape (as is the case with Colne Valley). None of these matters required to rebut the strong presumption is dealt with in the two landscape studies prepared on behalf of the objector groups, Villages Against Pylons and Pylons East Anglia. Applicant's Comments on Matters Raised by IPs The Applicant said it would respond in writing to the points raised by Villages Against Pylons, Ardleigh Parish Council and Pylons East Anglia's comment. Post Hearing Update The Applicant's responses to points raised by Villages Against Pylons, Ardleigh Parish Council and Pylons East Anglia's comment are included below.

Item No.	ExA Description	Applicant's Response
		<u>Villages Against Pylons concerns about visibility of TB35</u> Villages Against Pylons raised concerns about the visibility of TB35 and nearby pylons from Dedham Vale National Landscape. The Applicant has responded to similar points in 8.8.1 Applicant's Comments on Written Representations [REP2-029] and in relation to ExQ1 LV 1.14 in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299] as summarised below. With regard to the potential visibility of the Project, the Applicant has undertaken both desk top studies and field work to inform the assessment of effects on the special qualities of Dedham Vale National Landscape. Figures A13.5.6 to A13.5.12 contained within Annex B of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] illustrate the extent of theoretical visibility of discrete sections of the overhead line within 1 to 5 km of Dedham Vale National Landscape. These figures are useful to aid in the understanding of theoretical visibility of the Project within 5 km of Dedham Vale National Landscape because they relate to the theoretical visual influence of pylons more local to the National Landscape rather than considering the entire Project. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. It is important to also note that the desk-based ZTV mapping does not take into account reduction in perception of the infrastructure with increasing distance, or filtering by vegetation other than that included in the modelling. As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], the ZTV accounts for woodland blocks, modelled at 15 m high, but does not consider the additional screening and filtering provided by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area. The Applicant acknowledges that some of the proposed pylons would be distantly visible from parts of the National Landscape but this would not significantly affect the special qualities of the National Landscape as set out in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape

Item No.	ExA Description	Applicant's Response
		Assessment Study [APP-235]. It is important to note that being able to see the Project does not equate to a significant effect. Paragraph 5.10.34 of National Policy Statement EN -1 (2024) states that <i>'The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent'</i>. <u>Villages Against Pylons comment on Interpretation of EN-5</u> The Applicant notes that Villages Against Pylons interpretation of EN-5 is that residual effects on a National Landscape are unacceptable. The Applicant disagrees with this interpretation and has set out through the Examination its approach to the National Landscape and the setting, including the application of the mitigation hierarchy in respect of the National Landscape. See 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. EN-5 does not operate to prevent any harm to the National Landscape, nor does the s85 CROW 2000 duty. See 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] at page 33 in response to Dedham Vale Society. <u>Villages Against Pylons comment on the Colne Valley</u> Villages Against Pylons expressed their view that the Colne Valley is connected to and forms an important part of the setting of the National Landscape and Pylons East Anglia concurred with this view. The Applicant's response to this point is summarised against Item 5.2a above and further evidence is included in Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2. <u>Ardleigh Parish Council's comment on the EACN siting and cumulative effects</u> Ardleigh Parish Council raised concerns about the EACN siting and cumulative effect on Dedham Vale National Landscape. The Applicant has responded to EACN siting concerns previously in Section 3.6 of 8.8.2 Applicant's Comments on Local

Item No.	ExA Description	Applicant's Response
		Impact Reports [REP2-030]. The Applicant has also responded to cumulative concerns raised in REP4-380 within 8.4.12 Applicants Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194] as summarised below: With regard to cumulative effects on the National Landscape and its setting, the Applicant provided a response under LV 1.13 (b) in 8.9.1 Applicant's Responses to First Written Questions [REP3-074]. The cumulative assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] and was updated at Deadline 4 in 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. These documents set out and explain the Applicant's approach to cumulative assessment including which projects fit the definition of a project that ought reasonably to be considered for that assessment. The Applicant has concluded that there are no cumulative effects on the National Landscape or its setting that would give rise to significant effects on the special qualities of the National Landscape as a result of the Project (including the EACN) and other projects in the vicinity of Ardleigh (including North Falls, Five Estuaries and Tarchon). <u>Pylons East Anglia's comment on the Colne Valley and undergrounding</u> Pylons East Anglia raised concerns that the impacts, benefits and costs of a potential underground solution in the Colne Valley have not been tested. The Applicant notes that the Colne Valley is not subject to a National Landscape designation and therefore the strong presumption for overhead lines applies pursuant to EN-5 (2024) paragraphs 2.9.20 and 2.9.21. The SoS does not provide for another presumption (taking account of the fact that the Government, as confirmed in paragraph 2.9.24, has NOT laid down any further rule on the circumstances requiring use of underground or subsea cables) so the strong presumption for overhead lines remains in play in all cases outside the national designated landscape. The strong presumption is only capable of being shifted in very particular circumstances pursuant to EN-5. Where an Applicant or an ExA "recommends it",

Item No.	ExA Description	Applicant's Response
		this must be in circumstances where there is a high potential for “widespread and significant” landscape harm. This is the “gateway” in paragraph 2.9.23 to consideration of shifting from the strong presumption and where the SoS agrees that “gateway” is opened s/he must then give consideration of the other matters including cost and feasibility and can only then grant development consent for undergrounding if satisfied that the benefits <u>“clearly outweigh any extra economic social or environmental impacts that it presents”</u> (paragraph 2.9.25). Even when undergrounding may be recommended due widespread and significant effects, these policies still contain a tilted balance against undergrounding. Where an Applicant is promoting an overhead line away from Nationally protected landscapes in locations where there is a high potential for widespread and significant adverse landscape and or visual impacts, the SoS should be satisfied that the Applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate weighing the considerations in EN-5 (2024) paragraphs 2.9.24 and 2.9.25 and reflected in paragraph 2.11.6 (SoS decision making). In this case, the Colne Valley is NOT within a designated national landscape. It has never been a candidate for National Landscape designation and falls substantially below the criteria by which suitability is judged. A summary of why this is the case is below. As explained in ISH4, members of the Applicant’s landscape and visual team have previous experience working on behalf of Natural England to identify candidates for extensions to National Landscape areas, establishing whether landscapes have potential to meet the natural beauty criterion. The Applicant’s professional judgement is that despite being valued locally, the Colne Valley area does not strongly meet the natural beauty criterion for National Designation and is therefore not comparable to a National Landscape, as set out below: • The core parts of the Colne River valley floor and slopes have a distinct sense of place with scenic qualities, shaped by the River Colne and its enclosed floodplain and rising valley slopes with tributary valleys. The Planscape report

Item No.	ExA Description	Applicant's Response
		[REP5-277] notes <i>'Whilst the landscape does not necessarily contain rare or nationally unusual features, the combination and expression of landscape characteristics within the corridor creates a distinctive and locally important river valley landscape with a strong sense of place'</i>. • There are pockets of tranquillity and natural heritage features including wetlands, woodland and priority habitats, typically, along the narrow valley floor. There are some areas of ancient woodland. As tree cover within the Woodland Trust's Fordham Hall Estate matures, natural heritage value will increase over time. • Although the Planscape report [REP5-277] notes <i>'the landscape does not contain an extensive concentration of nationally exceptional heritage features or designed landscapes'</i>, there is evidence of time depth with listed buildings and surviving field patterns in places. The Planscape report [REP5-277] also notes that <i>'Whilst the landscape does not appear to possess nationally recognised literary, artistic or cultural associations comparable to those found within parts of the Dedham Vale and wider Stour Valley, it nevertheless exhibits a degree of local and regional cultural, recreational and historical association which contributes positively to its identity and appreciation.'</i> • The Applicant considers that these qualities are moderated by the influence of transport corridors (including A1124 and B1508), intensive agriculture, agricultural infrastructure and equestrian land use, modern settlement expansion (such as at Fordham, Aldham, Eight Ash Green and West Bergholt) and small pockets of modern commercial development (including to the south east of Fordham, west of Fordstreet and along the busy A1124). • Comparison of historic Ordnance Survey mapping against current mapping indicates that there has been notable field amalgamation in the Colne River valley and slopes. Intensive agriculture practices have reduced the proportion of tree cover and caused deterioration of hedgerow field boundaries in places. Overall, while the area demonstrates pockets of natural beauty, these are typically focussed within the core of the valley and are diluted elsewhere. The Applicant considers that the natural beauty criterion is not adequately met to support

Item No.	ExA Description	Applicant's Response
		consideration of National Designation. Neither, properly understood, does it form part of the setting of a designated landscape. The Applicant has undertaken a setting study for the National Landscape as set out in Annex A of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The setting study considers areas of the landscape where pylons may give rise to '<i>substantial impacts, positive or negative, on the natural beauty and special qualities</i>' of the National Landscape, as defined in the Development in the Setting of the Dedham Vale AONB Position Statement (National Landscape Partnership, 2024). The Applicant's findings conclude that the Colne Valley, including the area around Fordham, is not considered to form a part of Dedham Vale National Landscape setting. In addition, Natural England and the Dedham Vale National Landscape Partnership have raised no concerns or suggestions that the setting extends beyond that which has been identified by the Applicant. As indicated, the Applicant does not take the view that there is a high potential for widespread and significant adverse landscape visual impact. Context is important here. First the landscape effected should be of very high natural beauty value akin to if not the equal of that found in designated landscapes and for the reasons set out above, Colne Valley is not. Second, the test of a high potential for widespread and significant landscape harm must mean more than the ability to see the overhead lines as a negative feature in the landscape. The inevitability of landscape harm is recognised by the EN suite of policies and is not seen to displace the strong presumption in favour of an overhead line. The Applicant has undertaken a clear and evidence-based assessment of what the EN-5 tests mean in this context. It has undertaken a qualitative and quantitative approach to the meaning of these words in this context and has concluded clearly that the threshold of high potential for widespread and significant landscape harm of a type envisaged by EN-5 does not arise. The main reasons are set out in Appendix D2 of 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [Revision A] and Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15 [Revision A].

Item No.	ExA Description	Applicant's Response
		Widespread must mean wider than a normal identification of harm associated with pylon infrastructure and significant again requires something more than an expected impact. The Applicant has concluded, on the evidence relating to Colne valley, the EN-5 “gateway” high level of impact which could require consideration of undergrounding has not been met. The strong presumption in favour of overhead lines thus remains on this basis. The question for the SoS in these circumstances is whether the Applicant has provided evidence to support its decision on whether undergrounding at Colne valley is or is not appropriate in light of the policy framework. The Applicant’s position is that inherently the fact that the widespread and significant test was not met constitutes the appropriate evidence as the “gateway” requiring further consideration of undergrounding pursuant to EN-5 paragraphs 2.9.24 and 2.9.25 is not opened. Bearing in mind in these circumstances where the strong presumption lies, even if there was a finding of such extraordinary harm, the other limbs of the presumption in paragraphs 2.9.24 and 2.9.25 would remain in play. The Villages Against Pylons and Pylons East Anglia landscape and visual reports on the Colne Valley submitted at Deadline 5 [REP5-277 and REP5-265] simply do not address these matters at all. There is no evidence submitted on the paragraph 2.9.24 and 2.9.25 points. Even if others took a different view on whether there were “widespread and significant effects”, on a precautionary basis, the Applicant has considered the potential for undergrounding in accordance with paragraphs 2.9.24 and 2.9.25. The Applicant concludes that it is not just the case of undergrounding the valley, as the effects of CSE compounds would offset any benefit of pylon removal. In terms of cost, increasing the length of cable leads to the underground cable being significantly more expensive and as such the decision making does not lead to the strong presumption being rebutted based on scaling the costs on a similar basis for which they were estimated for the approximately 2km Waveney Valley Alternative option at approximately £70m.

Item No.	ExA Description	Applicant's Response
		Finally, the Sof S would need to understand that the implementation of a decision to require undergrounding in the Colne Valley would mean the Project could simply not meet the urgent need for infrastructure by 2030/1. <u>Pylons East Anglia comment comparing the Colne Valley to a nationally designated landscape.</u> The Applicant disagrees and has provided further evidence within Appendix B of 8.4.15 Applicant's Comments on Responses to ExQ2 8.4.15.
5.2c	The Planscape Landscape and Visual Technical Note [REP5 277] Have the landscape effects have been looked at with too much of a broad brush, using the landscape area as opposed to more localised harm, and could that understate the likely effects arising from the introduction of large-scale infrastructure in the Colne Valley area?	The Applicant has undertaken the LVIA consistently across the entire study area for the Project, which is 180km in length. It has used published landscape character assessment evidence for the baseline assessment. The Applicant recognises that across these larger landscape character areas, sensitivity will inevitably vary, but stands by its judgements made in the assessment.
5.2d	The Planscape Landscape and Visual Technical Note [REP5 277] Undergrounding was considered at Waveney Valley, in line with EN-5, what are the principal differences between the Waveney Valley and the Colne Valley in this respect and with reference to EN-5?	Oral Summary of the Applicant's Case There were many reasons why undergrounding was considered on a precautionary basis at the Waveney Valley. It was not just because or even primarily because of paragraph 2.9.23 as Landscape and Visual effects from overhead lines were not considered to engage the necessary level of effect. This was set out from paragraph 5.4.49 of the 2024 Design Development Report [APP-359] The assessment was undertaken at a preliminary stage and on a precautionary basis with emphasis on heritage and the potential combination of effects along with landscape and recreational amenity. In particular the setting of the Grade I listed church (St Remigius) and whether the use of underground cable was necessary to mitigate those effects. The Applicant took the clear view in the Colne Valley that whilst of local value, the Valley is not part of the setting of the Dedham Vale National Landscape, and fell

Item No.	ExA Description	Applicant's Response
		short of meeting statutory designation requirements and that in this context, the impacts of the proposal were NOT widespread and significant in the terms set out by policy. There was also less concern about effects on the setting of heritage assets (certainly not of any Grade I listed buildings). Once the Applicant has identified the potential for undergrounding as a solution, it would need to look at feasible routes for this. The Colne Valley is very narrow and would need to include CSE compounds and the transitions from overhead to underground. When taking these into account at this location, the Applicant considered that the consequences of the extra infrastructure would not offset the consequences of the pylons. The Applicant is also required to consider the consequence of cost and to put that in the relative balance against the benefits gained. The Applicant was fully aware of the order of costs likely to be required because of the Waveney Valley statutory consultation work (where the WVA was estimated previously at ~£70m). For the Colne Valley, the Applicant does not consider that the benefit of a broadly similar extent of underground cable outweighs the cost.
5.2e	The Landscape Partnership Landscape Sensitivity Appraisal [REP5-226] Figure 13 in the Landscape Partnership Report shows that the Colne Valley and the Roman River have a higher landscape sensitivity than the underground area to the north. Please can the Applicant clarify why undergrounding is proposed in an area with a lower sensitivity?	Oral Summary of the Applicant's Case The sensitivity of Landscape Character Areas (LCA) have been assessed against the different components of the Project. Undergrounding is proposed in the LCA south of Dedham Vale National Landscape and, therefore, they are of lower sensitivity to an underground solution. Applicant's Comments on Matters Raised by IPs In response to the comment about Dedham Vale lying just to the north of Figure 13 in the Landscape Partnership report, the Applicant noted that Dedham Vale lies approximately 1.3 km from the Great Horkesley (Tilbury side) CSE compound and is not immediately adjacent. Undergrounding is proposed in this area in recognition of the Dedham Vale National Landscape and the potential for significant effects on the special qualities. The Applicant also noted that the National Landscape Partnership broadly concur with the findings of the Applicant's assessment.
		Post Hearing Update

Item No.	ExA Description	Applicant's Response
5.2f	There are both significant landscape and visual effects and significant cumulative effects in the Colne Valley. How has that layering or combination of effects been considered in this sensitive location?	As set out in paragraph 13.4.20 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] the sensitivity of a landscape receptor to change was based on weighing up professional judgements regarding susceptibility and value. As noted in paragraph 13.4.21, the susceptibility of the landscape to the Project differs depending on the component of the Project being assessed, with different factors to consider for overground infrastructure and underground cables, as set out in Tables A13.1.2 and A13.1.3. As explained in ISH 4 the decision to underground part of the Project, north of the Colne Valley, was made in response to the potential for significant effects on the special qualities of Dedham Vale National Landscape. Judgements relating to sensitivity took into consideration the different elements of the Project to inform the assessment of effects as reported in the LVIA. Oral Summary of the Applicant's Case The effects on landscape character and visual receptors will affect a sequence of places and people along the length of the line in this area, and effects are described in relation to each of the assessment units. The Project would not be experienced as a whole. The visual assessment recognises that people will view the Project within different parts of the landscape, as they will along the whole of the Project. Applicant's Comments on Matters Raised by IPs In response to Pylons East Anglia comment that there is widespread and significant adverse harm to the Colne Valley, the Applicant noted it had previously responded about this in writing and agreed to provide the reference in writing. Post Hearing Update In response to Pylons East Anglia, the Applicant disagrees that the significant landscape and visual effects identified in the LVIA would equate to a 'widespread and significant' effect on the Colne Valley for the reasons set out under Action Point 8.3p in 8.5.7 Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 [REP4-302] and as expanded on within Appendix D2 to 8.4.14

Item No.	ExA Description	Applicant's Response
		Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [Revision A].
5.3 Limits of Deviation		
5.3a	New and amended viewpoints and The provisions of Commitment GG34 of the Outline CoCP Following the exercise completed at Deadline 5 on the visualisations and the LoD, is the Applicant proposing to add to the list in GG34 of the code of construction practice?	Oral Summary of the Applicant's Case The Applicant has reviewed the LoD visualisations and undertaken a back-check of the sensitivity testing section of the landscape and visual impact assessment. It has concluded that there would be no change to the magnitude of effect or significance of effect at any of the landscape and visual viewpoints. The Applicant also found that the visualisations reinforced the findings presented in the RVAA and there were no material changes to the effects presented. Therefore, it is not proposing to make any changes to the commitments in GG34. Applicant's Comments on Matters Raised by IPs In response to SCC about a schedule of sensitive locations, the Applicant noted that if SCC can provide the schedule as soon as possible, the Applicant will respond to these as soon as it can. Post Hearing Update The Applicant notes Action Point 7 and provides a response below in the Post Hearing update to Item 5.3c. The matter raised on adding to the list in GG34 of the code of construction practice has also previously been addressed on heritage grounds in response to ExQ2 HE2.7 in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211], which explains that, for the vast majority of heritage assets assessed for the Project, movement within the LoD would not alter the assessment conclusions. Exceptions to this are accounted for in GG34, which restricts the LoD for impacts through change to setting at: • TB136 (Langleys) • TB137 (Langleys) • TB192-TB193 (St Mary's Church, Buttsbury)

Item No.	ExA Description	Applicant's Response
		TB245 (Wyfields Farmhouse) The response to HE 2.7 also notes that retaining flexibility within the LoD can assist in avoiding archaeological remains through micro-siting where required. Further information on this point is provided in response to ExQ2 HE 2.11 in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211].
5.3b	New and amended viewpoints and The provisions of Commitment GG34 of the Outline CoCP On the RVAA in regarding the TB55 and the pylons to the rear of Hines Close in Aldham, would a restriction in the LoD at this location prevent any further movement to the east be of use?	Oral Summary of the Applicant's Case The Applicant noted that it had only received requests to produce two LoD visualisations in respect of RVAA from stakeholders and this was not one of them. However, the Applicant agreed to respond in writing on this. Action Point 6: Provide further comments regarding limiting movement of pylons closer to Hines Close Aldham. The Project design has sought to minimise effects on Aldham. A visualisation illustrating the LoD was provided from Viewpoint 4.37: Hines Close, Aldham from on page 16 in 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]. As noted under Item 5.3a the Applicant has concluded that there would be no change to the conclusions of the Sensitivity Testing undertaken in Section 13.9 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
5.3c	New and amended viewpoints and The provisions of Commitment GG34 of the Outline CoCP SCC and Braintree District Council both raised questions about whether the worst case is shown and then assumed in the assessment.	Oral Summary of the Applicant's Case Post Hearing Update Within document 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 LoDs. This includes the precautionary approach of considering the scenario whereby the closest pylon is increased in height by 6m and is repositioned to a location within the LoD where it would have the greatest visual impact upon that property. This is predominantly, but not always, the closest point in the LoD to the residential property being assessed (taking into consideration that the pylon would not move right to the edge of the 50 m Limits of Deviation due to the

Item No.	ExA Description	Applicant's Response
		expected sway / swing of conductors – as outlined in Section 2.4 of 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194]). Braintree District Council noted that the Residential Visual Amenity related LoD visualisations (shown in document 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]) with regards to receptors E7 (West Ford Farm Cottage) and E8 (Whiteheads Farm) do not show potential for the pylons to move along the original route but only in a lateral direction, and they do not necessarily show the worst-case scenario. Recognising that there are theoretically multiple design scenarios associated with moving any of the pylons away from the Project's proposed centre line, the Applicant's Residential Visual Amenity Assessment-related LoD visualisations (shown in document 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]) took the reasonable approach of showing the closest pylons to these residential properties moved perpendicularly from the centre line towards them. The Applicant has, however, assessed the worst-case scenario (whereby the closest pylon is placed at the closest allowable point within the LoD to the residential properties) in Tables A13.4.54 and Table A13.4.55 within Document 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126]. In response to Braintree District Council's maintained position that the pylons will appear unpleasantly encroaching and inescapably dominant from both properties, and that Residential Visual Amenity Threshold (RVAT) has been breached, the Applicant wishes to refer the ExA to Tables A13.4.54 and A13.4.55 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126] which set out in detail an actual assessment of why it is considered the RVAT has not be breached. When considering such matters the Applicant wishes to stress importance of assessing such effects 'in the round', as defined in the glossary of the Landscape Institute's 'Technical Guidance Note2/19 -

Item No.	ExA Description	Applicant's Response
		Residential Visual Amenity Assessment¹⁴ and as set out in the methodology of document 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP5-126]. Braintree District Council requested that GG34 is expanded to fix the route in proximity to these two residential properties receptors, regardless of whether the RVAT has been breached. Based on the response provided above, the Applicant does not consider it necessary to expand GG34. Action Point 7: Suffolk CC to provide to the Applicant as soon as possible a list of further sensitive locations it wishes to see included in commitment GG34 of the outline code of construction practice and the Applicant is to respond at Deadline 6. In response to Action Point 7 the Applicant has asked for an update from Suffolk County Council on when a list of locations that SCC wishes to see included in commitment GG34 of the outline code of construction practice would be available. A response was received from SCC to confirm this will not be issued by Deadline 6.
5.3d	New and amended viewpoints and The provisions of Commitment GG34 of the Outline CoCP Ardleigh Parish Council	Applicant's Comments on Matters Raised by IPs In response to Ardleigh Parish Council comment that it is surprised that the Applicant has not revised its assessment based on the new visualisation, from the Ardleigh crossroad looking towards the church, the Applicant agreed to respond in writing. Post Hearing Update The Applicant has reviewed the additional visualisations provided in 8.4.12.1 Response to ISH2 Action Point 25 – LoD Visualisations – Part 3 [REP5-197], HE25 visualisation, and confirms that these do not alter the assessment conclusions. This is in line with the response to ExQ2 HE2.7 in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211] that movement within the LoD would not alter the assessment conclusions. For the vast majority of heritage

¹⁴ Landscape Institute (2019) Technical Guidance Note 2/19: Residential Visual Amenity Assessment

Item No.	ExA Description	Applicant's Response
		assets assessed for this Project, the nature and extents of their settings are not so clearly defined that the amount of movement that would be possible within the LoD would alter how those pylons interact with the asset's setting and therefore would not make an appreciable difference to the conclusion of assessment. In the case of the LoD visualisation for viewpoint HE25, this demonstrates what had already been concluded from 7.12 Visualisations - Part 9 of 9 [APP-351], viewpoint HE25, that there would be glimpsed views from the centre of Ardleigh conservation area, near the Church of St Mary (1112060), of the overhead line.
5.3e	New and amended viewpoints Mr Micklem of Langley's Estate asked about why the visualisation appears to show the low-height pylons and questioned if this was accurate.	Applicant's Comments on Matters Raised by IPs The Applicant confirmed that the visualisations adjacent to Windmill House were prepared using the low-height pylon design to show the worst-case scenario. However, the Applicant also confirmed a change in arrangement so that there would be two standard-height pylons to the south of the river rather than three low-height pylons. The shorter pylons remain to the north of the river. Post Hearing Update The Applicant would like to confirm that the LoD visualisation from Windmill House on pages 38 to 43 of 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] takes into account the change in arrangement to standard height pylons south of the River Chelmer. The green dotted line illustrates a 6m increase in height above the standard height pylons, based on the average height of all pylons up to 1200m from the viewpoint.
5.3f	Decision making and approval mechanism	Oral Summary of the Applicant's Case The Applicant was not requested to make a further oral summary under this item. Post Hearing Update Linked to the comments made by SCC with regards to Item No. 5.3a on making a further commitment in GG34, the Applicant disagrees with SCCs view that a further approval mechanism is required in the sensitive locations such as an approval regime of micro-siting for pylon locations. The Applicant's position is that the Environmental Statement has assessed the alignment and pylon heights as shown

Item No.	ExA Description	Applicant's Response
		on Figures 4.1. and 4.2 of the ES [REP4-109 and REP4-110] and provided in the Works Plans (as secured through the DCO). As part of the ES sensitivity testing has also been undertaken for the LoD. No further approvals are necessary under the DCO to utilise the LoDs because the ES has assessed the LoDs (against a reasonable worst case) and additional mitigation has been applied where appropriate. This approach adopted for LoDs by the Project outlined above is consistent with other National Grid DCOs that have been approved and we believe consistent with many other DCOs. National Grid does have an internal governance process for consideration of utilising the LoDs for proposed changes in pylon locations and heights post consent. The LoDs are primarily in place to allow for unforeseen circumstances. This internal process includes assessment of the consistency of the proposed use of LoDs with the environmental effects reported in the ES. The Applicant does not consider any further formal approval mechanism for a change pursuant to the LoDs is required and such a mechanism would risk delays to the delivery of the Project.

5.4 Any other landscape and visual matters

5.4a Link pillars in the Dedham Vale

Please can the Applicant clarify, which is correct as the drawings appear to show rail fences of around 1.8m (6 foot), whereas the answer to question LV 2.3, stated a 1.3m post and rail fence. Also, the DASSI states that the proposed compounds would be 4m by 4m, and, in LV 2.2 it says 5m by 5m. Please can the Applicant update the drawings and the DASSI as required?

Oral Summary of the Applicant's Case

The Applicant said it would confirm the dimensions in writing and will update the documents as required.

Action Point 8: Check and confirm dimensions of fencing and compound sizes for link pillars within the Dedham Vale National Landscape and update drawings where relevant.

The Applicant has amended drawing AENC-MMAC-ENG-DWG-0085-06A and include this in the updated **2.6.1 Design and Layout Plans - Subs & Cables [Revision D]** to show the footprint of the proposed compound area would be 5m x 5m and the correct dimension of the post and rail fence at 1.3m in height. The Applicant has also updated **7.16 Design Approach for Site Specific Infrastructure [Revision D]** to confirm the maximum footprint is 5m x 5m as provided in response to ExQ2 LV 2.2.

Item No.	ExA Description	Applicant's Response
5.4b	Link pillars in the Dedham Vale Some parties have suggested a requirement to ensure that detailed design is submitted and approved prior to commencement. Is that proposed requirement acceptable to the Applicant	Oral Summary of the Applicant's Case The Applicant submitted an updated Revision C version of the 7.16 Design Approach for Site Specific Infrastructure [REP5-166] at Deadline 5 with a link pillars design co-ordination design principle to include a design review workshop on link pillars. The Applicant will invite representatives from the relevant LPAs and also Dedham Vale National Landscape Partnership to a design review workshop where we will present the design details in terms of layout and appearance. There will be a mechanism for third parties to input into the design review process through this workshop. The Applicant confirmed that the workshop would take place after the close of Examination. The Applicant noted that the siting of link pillars is dependent upon electrical design requirements due to the nature of the cable, so cannot be placed anywhere within the Limits of Deviation. However, the Applicant agreed to provide further details in writing along with a response to the need for a requirement on this. The Applicant noted SCC's clarification that it is not seeking to control the siting of where the link pillar is, it is seeking to control the above-ground appearance. Applicant's Comments on Matters Raised by IPs The Applicant acknowledges the request from Pylons East Anglia about whether Dedham Vale Society could be included in the design review. The Applicant considers that the views of the Dedham Vale Society can be conveyed via the Dedham Vale National Landscape Partnership who will act as a central point of contact communicating any representations, observations or concerns on behalf of the Society to the Design Review Panel as appropriate. Action Point 9: Consider design details of link pillars and their compounds in the context of updating the DASSI, the new requirement as suggested by Essex County Council, or altering requirement 12 regarding above ground structures. The Applicant considers the updated 7.16 Design Approach for Site Specific Infrastructure [Revision D] submitted at Deadline 6 provides sufficient design content on the link pillar compound size, fencing dimensions and maintenance

Item No.	ExA Description	Applicant's Response
		access details for it to be unnecessary to submit these details and gain approval by the relevant planning authority at the detailed design stage. The siting of link pillars cannot be moved along the cable length away from the cable joints for technical reasons. The link pillars also need to be positioned on the outer cable edge where lateral movement is also restricted by technical bonding requirements. Given the constraints of the cable system design can restrict the flexibility for micro-siting link pillars we cannot accept a requirement that requires the siting to be approved by the local planning authorities. However, the Applicant is committed to providing an early in-person workshop with the relevant local planning authorities and the Dedham Vale National Landscape Partnership to discuss location (cable system design restrictions), layout and appearance to inform detailed design as early as possible before the Design Review by the Design Review Panel. This further commitment is detailed in the updated DASSI [Revision D] submitted at Deadline 6 under the Link Pillars Design Co-ordination Design Principle (see section 5.6). Where there is scope for variation such as colour finish of the link pillar control cabinets, ground surface treatment within the compound area and fencing appearance, the Applicant accepts a requirement for the relevant local authorities to approve these details and has updated Requirement 12 in 3.1 Draft Development Consent Order [Revision F] submitted at Deadline 6. The altered requirement confirms the design approach for site specific infrastructure is secured by Requirement 12 that provides for the design review panel process as described in 7.16 Design Approach for Site Specific Infrastructure [Revision D]. The details to be approved under Requirement 12 comprise: • Colour of control cabinet • Ground surface treatment • Fencing appearance The updated Requirement 12 largely reflects the request made by ECC albeit does not include siting or access and compound size for the reasons outlined above.

Item No.	ExA Description	Applicant's Response
		Overall, in line with NPS EN-1 (2024) the Applicant has carefully considered both functionality (including fitness for purpose) and aesthetics as far as possible within the technical restrictions to not compromise safety, security and performance requirements when deciding what detailed design can be submitted for approval in Requirement 12 and the level of detail requiring approval from the relevant local authorities.
5.4c	Dark skies in the Dedham Vale Please can the Applicant update the visual baseline VRA C8 Higham [APP-229] and the assessment study [APP-235] to include reference to the dark sky designation?	Oral Summary of the Applicant's Case The Applicant confirmed that it will update these documents. Post Hearing Update The Applicant will update 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] and 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235] at Deadline 7.
5.4d	Dark skies in the Dedham Vale It is noted in local-level policy that dark skies are a component of tranquillity, that this in turn is a special quality of the Dedham Vale National Landscape where minimal light intrusion is noted as a contributing factor to that tranquillity. Across various documentation, there's reference to lighting in the hours of darkness. This is described as both unlikely to be perceptible and an exceptional and infrequent occurrence but also as having direct effects. Please can the Applicant confirm which areas of the National Landscape are likely to have direct effects from nighttime construction lighting, how	Oral Summary of the Applicant's Case The Applicant said it would respond in writing. Action Point 10: Clarify which areas of the Dedham Vale National Landscape are likely to suffer direct effects from night time construction lighting, how frequent and for what duration such effects would be, and if any mitigation is possible. There will be direct effects on parts of the Dedham Vale National Landscape as a result of lighting during construction. Task lighting during construction would be anticipated during specific operations, and would largely only be applicable to operations outlined in sub-paragraph (4) of requirement 7 in 3.1 Draft DCO [Revision F] (operations that may take place outside the core working hours and, as the case may be, the hours referred to in sub-paragraph (3)). During the undertaking of these operations task lighting would be required to ensure all elements of the task can be completed safely. Lighting would be kept to the minimum to safely undertake the task. Lighting would be directional. Light

Item No.	ExA Description	Applicant's Response
	frequent they may be and if there is any mitigation proposed.	spillage will be managed by minimising the provision of lighting, by keeping to where it is required for tasks and using controls such that it is only on when required. This will follow the dark skies strategy: to cut light pollution, its impact on wildlife, prevent wasting electricity, and mitigating visual impact at night. These measures are secured by commitments GG17, GG26, B06 and LV03 in 7.2 Outline Code of Construction Practice [Revision F]. These measures are also discussed further under 5.4e below in addition to changes made within 7.16 Design Approach for Site Specific Infrastructure [Revision D]. The likely operations which will require lighting within the Dedham Vale National Landscape include; • trenchless crossing operations; • the jointing of underground cables; • the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; • any highway works requested by the relevant highway authority to be undertaken on a Saturday or Sunday or outside the core working hours; • security monitoring; • non-intrusive surveys; • intrusive surveys; and • delivery to the transmission works of abnormal indivisible loads and any highway works requested by the relevant highway authority to be undertaken outside the core working hours. Where lighting is required in construction compounds, it would follow the same principles as outlined above. Windows will be fitted with blinds to control light spill if the facility is occupied after dark. The duration of any required lighting within the Dedham Vale National Landscape would be limited to the duration of the specific operation. The only activities likely to be 24 hours would be the trenchless crossing operations and jointing of underground cables (the main works associated with the jointing of underground cables are typically undertaken within a fully enclosed tent). Other operations would

Item No.	ExA Description	Applicant's Response
		likely only be for a period of hours to complete the task or they can securely and or safely be paused. Lighting may also be required during periods of poor light within the core working hours such as at the start and end of the day within winter months. The Applicant has identified that there will be significant effects on visual receptors within the following Visual Receptor Areas (VRA) within the National Landscape during construction. These judgements take into consideration the sources of effect during construction listed in paragraph 13.7.3 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], which includes construction lighting. The paragraph number of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] where the judgement is set out in full is provided in brackets. • VRA C6 Raydon (within approximately 0.5 km of the Order Limits, see paragraph 13.6.63) • VRA C7 Holton St Mary and East Bergholt (within approximately 0.5 km of the Order Limits, see paragraph 13.6.75) • VRA C8 Higham (within approximately 0.5 km of the Order Limits, see paragraph 13.6.88) • VRA C9 Stratford St Mary and Dedham (within approximately 0.5 km of the Order Limits, see paragraph 13.6.100) • VRA C10 Dedham Heath (within approximately 1.5 km of the Order Limits, see paragraph 13.6.112) • VRA C11 Langham (within approximately 1.5 km of the Order Limits, see paragraph 13.6.126) • VRA D1 Tye Green and Boxted (within approximately 0.5 km of the Order Limits, see paragraph 13.7.5) • VRA D2 Little Horkesley and Wormingford (within approximately 0.5 km of the Order Limits, see paragraph 13.7.17) The Applicant has identified that there will be significant effects within the following Landscape Character Types (LCT) and Landscape Character Areas (LCA) within

Item No.	ExA Description	Applicant's Response
		the National Landscape during construction, as set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. As noted above for visual receptors, this judgement includes construction lighting: • Valley Meadowlands LCT (within approximately 0.5 km of the Order Limits, see paragraph 13.3.286) • Rolling Valley Farmland LCT (within approximately 1.5 km of the Order Limits, see paragraph 13.3.300) • Plateau Farmlands LCT (within approximately 0.5 km of the Order Limits, see paragraph 13.3.326) • Bromley Heaths LCA (within approximately 1.5 km of the Order Limits, see paragraph 13.3.381) • Langham Farmland Plateau LCA (within approximately 1.5 km of the Order Limits, see paragraph 13.3.433) • Stour River Valley Floor LCA (within approximately 0.5 km of the Order Limits, see paragraph 13.3.448) • Stour River Valley Slopes LCA (within approximately 0.5 km of the Order Limits, see paragraph 13.3.462 and 13.3.490) • Rochfords Farmland Plateau LCA (within approximately 1.5 km of the Order Limits, see paragraph 13.3.517) • Great Horkesley Farmland Plateau LCA (within approximately 1.5 km of the Order Limits, see paragraph 13.3.532) The effects of lighting during construction are also noted to be a contributing factor to the significant effect on the 'sense of relative tranquillity' special quality of Dedham Vale National Landscape during construction, as set out in Table A13.1.3 in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].
5.4e	Dark skies	Oral Summary of the Applicant's Case The Applicant said it would respond in writing.

Item No.	ExA Description	Applicant's Response
	Pylons East Anglia stated that the National Planning Guidance states that, in a development in or near a protected area like National Landscape or intrinsically dark landscape, then it is appropriate to set conditions at the planning stage. Pylons East Anglia would argue that the entire route is an inherently dark area, not just the National Landscape, so there needs to be efforts to reduce light spill at all locations. It is suggested that a lighting design strategy is produced and approved by the LPAs similar to the Cambridge Wastewater Treatment Plant DCO.	Action Point 11: Respond to the comments of Ms Pearson of Pylons East Anglia regarding dark skies along the whole route. A number of measures are proposed to reduce light spill during construction and operation as set out below. These measures are secured by commitments GG17, GG26, B06 and LV03 in 7.2 Outline Code of Construction Practice [Revision F]. • GG17 Any activity carried out or equipment located within a temporary construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where reasonably practicable • GG26 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. Permanent lighting (where required) will be designed, positioned, and directed to reduce the intrusion into adjacent properties, protected species, and habitats. Task-specific lighting will be directed to reduce intrusion so far as is reasonably practicable, and considered by all necessary specialists. • B06 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 (2024). 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. • LV03 Construction lighting will be directional and minimised. See B06 for additional details.

Item No.	ExA Description	Applicant's Response
		The Applicant does not consider that a separate Lighting Design Strategy is necessary because both operational and construction lighting are already appropriately controlled through the application documentation and secured commitments. The operational lighting requirements for the proposed new and extended substations are set out in Section 5.2 of the 7.16 Design Approach for Site Specific Infrastructure [Revision D], and an Operational Lighting Management Strategy is also included in Appendix B. This provides the framework for the design and management of permanent lighting associated with the EACN Substation. The strategy confirms that operational lighting will be designed to minimise light spill and unnecessary illumination, having regard to the Dedham Vale National Landscape and Suffolk & Essex Coast and Heaths National Landscape Lighting Design Guide: Guidance to Reduce Light Pollution and Protect Our Dark Skies (Darkscape Consulting, 2023). Construction lighting is addressed separately through the 7.2 Outline Code of Construction Practice [Revision F] as outlined above. These measures provide appropriate control over temporary construction lighting effects. Taken together, the Operational Lighting Management Strategy and the construction lighting commitments secured through the Outline CoCP provide a robust framework for managing lighting throughout both the construction and operational phases of the Project. The Applicant therefore considers that a separate project-wide Lighting Design Strategy would duplicate existing controls.
5.4f	Cumulative effects In the response to ExQ2 GEN 2.3, the Applicant described significant magnification as an effect that is significantly greater/larger/magnified than those reported as a result of the project in isolation and the use of significant magnification considers where further significant effects are likely cumulatively. Considering that in the context	Oral Summary of the Applicant's Case The Applicant said it would respond in writing. Action Point 12: Respond to ExA question: In your response to ExQ2 GEN2.3 you described 'significant magnification' as an effect that is 'significantly greater/ larger/ magnified' than those reported as a result of the proposed development in isolation and the use of 'significant magnification' considers where further significant effects are likely cumulatively. Considering this in the context of cumulative landscape and visual effects, is there a threshold

Item No.	ExA Description	Applicant's Response
	of cumulative landscape and visual effects, is there a threshold for landscape and visual effects above which significant magnification is identified? Can the Applicant provide any specific examples that illustrate 'significantly greater, larger and magnified' in that context?	for landscape and visual effects above which significant magnification is identified? Can you provide some specific examples that illustrate significantly greater, larger and magnified? As noted in the Applicant's response to GEN 2.3 on pages B1 and B2 of 8.9.2 Applicant's Response to Second Written Questions [REP5-211], professional judgement has been used to determine whether a predicted effect is deemed to be a significant magnification of effects already predicted to occur (as a result of the Project alone), with such effects described as moderate (significant) or major (significant) depending on whether the effect described is relatively localised or relatively wide-ranging. Where an effect was judged to be a localised (not significant) magnification, the cumulative effect was judged to fall below the threshold of significance, i.e. minor (not significant) or negligible. For example, in 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163] the Applicant has identified both significant and not significant cumulative inter-project effects in the vicinity of Bramford Substation. Specific examples of a major, moderate and minor effect are provided below. The combination of the Project and Bramford to Twinstead (DCO2) would result in a significant magnification of effects already predicted to occur during operation, within Visual Receptor Areas (VRA) C1, C4 and B12, and within the Ancient Plateau Claylands Landscape Character Type (LCT), Ancient Estate Claylands LCT and Rolling Valley Farmland LCT. This would be due to the introduction of the Project in proximity to Bramford to Twinstead, with both comprising 400 kV overhead lines connecting into the existing Bramford Substation. Due to the nature of both projects, comprising overhead line infrastructure approximately 50 m tall, the effects were judged to be relatively wide-ranging, resulting in a major adverse and significant cumulative effect. The combination of the Project and a proposed solar farm and battery storage development south of Church Farm (BMS52) would result in a significant magnification of effects already predicted to occur during operation, within VRA B12 and the Ancient Plateau Claylands LCT and Rolling Valley Farmland LCT. Given the nature of BMS52, comprising solar arrays and battery storage which are

Item No.	ExA Description	Applicant's Response
		typically 3 m or less in height, the effects were judged to be relatively localised, resulting in a moderate adverse and significant cumulative effect. The combination of the Project and a proposed residential development north of the A1071, Ipswich (BMS27) would lead to a localised (not significant) magnification of effects within VRA C3 and within the Rolling Valley Farmland LCT and Valley Meadowlands LCT. Although there would likely be some combined visibility of the Project and BMS27 from the western edge of Ipswich and Chantry Park, the distance to the Project and the surrounding urban context of BMS27, where buildings and vegetation would filter and screen views, would result in a minor adverse and not significant cumulative effect.
5.4g	Cumulative effects In the response to ExQ2, Appendix E included a series of drawings illustrating the location and geographical extent of the cumulative landscape and visual effects. These were particularly helpful, and the ExA wondered if it would be possible to put together a similar package of drawings for significant non-cumulative landscape and visual effects?	Oral Summary of the Applicant's Case The Applicant said it would respond in writing by Deadline 7. Action Point 13: Respond to ExA question: In your response to ExQ2 [REP5-211], Appendix E includes a series of drawings illustrating the location and geographical extent of the cumulative landscape and visual effects. These are particularly helpful and the ExA requests that a similar package of drawings is provided for significant (non-cumulative) landscape and visual effects together (by deadline 7). The Applicant will respond to this by Deadline 7.
5.4h	Sequential impacts In ExQ2, the ExA asked about sequential impacts on users of the public right-of-way network, and, in response the Applicant identified users of the Essex Way and NCN route 50 are likely to experience significant cumulative effects. Please can the Applicant confirm what proportion of those routes would be subject to significant cumulative	Oral Summary of the Applicant's Case The Applicant stated that is does not have specific distances over which the significant cumulative effects would be experienced but it would take this away and respond in writing. Action Point 14: Respond to ExA question: ExQ2 [REP5-211] asked about sequential impacts on users of the PRow network. In response you identified users of the Essex Way and NCN Route 50 as likely to experience significant cumulative effects. Can you confirm what proportion of these routes would

Item No.	ExA Description	Applicant's Response
	effects and if any mitigation would be appropriate?	be subject to significant cumulative effects? What mitigation, if any, might be appropriate for these routes, and how would it be secured? The total length of the Essex Way is approximately 130 km, of which approximately 70 km is within the 3 km Landscape and Visual study area. Significant cumulative effects would be experienced by visual receptors travelling on the Essex Way within Visual Receptor Areas (VRA) E1, E4, E5, E6 and F2, as follows: • There would potentially be combined views of the Project and greenhouses and solar energy provision at Rivenhall Airfield (ECC35) within VRAs E1 and E4, intermittently over a distance of approximately 5 km, between Silver End and the River Blackwater; • There would potentially be successive and combined views of the Project and a proposed solar farm east of White Notley (B42) within VRAs E4 and E5, intermittently over a distance of approximately 2 km, between the railway crossing near Fambridge Hall and Malting's Farm (south of White Notley); and • There would potentially be successive views of the Project and Longfield Solar Farm (DCO13) within VRAs F2 and E6, intermittently over a distance of approximately 2 km, between Lyons Hall and Sandy Wood. Significant cumulative effects would therefore be experienced intermittently over a combined distance of approximately 9 km, which is approximately 7 % of the total route length of the Essex Way, or approximately 13 % of the route length of the Essex Way within the Landscape and Visual study area. The assessment represents a worst-case, and in reality, combined and successive views would not be continuous along these lengths. The total length of National Cycle Network (NCN) Route 50 is approximately 148 km, of which approximately 15 km is within the 3 km Landscape and Visual study area. Significant cumulative effects would be experienced by visual receptors travelling on NCN Route 50 within VRAs E6 and F2, where the Project would be seen in intermittent, successive views with Longfield Solar Farm (DCO13) over a distance of approximately 1 km, in the vicinity of Fuller Street. The significant effect would be experienced from less than 1 % of the total route length of NCN Route 50, or approximately 7 % of the route length of NCN Route 50 within the Landscape

Item No.	ExA Description	Applicant's Response
		and Visual study area. The assessment represents a worst-case, and in reality, combined and successive views would not be continuous along these lengths. The Applicant responded to a query on the mitigation of cumulative effects under LV2.9 (c) on page 162 of 8.9.2 Applicant's Response to Second Written Questions [REP5-211]. No additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]. Although significant effects have been identified, it is not practicable to mitigate these through landscape mitigation measures, predominantly due to the scale of the works and the heights of the pylons. The Applicant also notes that landscape mitigation may not be appropriate or desirable along long-distance walking and cycling routes as it may filter and screen open views which contribute to the enjoyment of the route.
5.4i	Residential Visual Amenity Assessment ([REP5-126] to [REP5-135]) In the response to the Rule 17 letter at deadline 5A, concerning the cottages opposite Flordon Hall cottages, the Applicant provides a justification for the 200m distance. However, the visuals show a fairly high significant impact to High Hopes, which is noted as being 208m from the proposed development and still triggers the RVAA. Are there likely to be many other properties of a similar nature?	Oral Summary of the Applicant's Case When undertaking the RVAA (ES Appendix 13.4 Residential Visual Amenity Assessment Parts 1 to 4 (Final Issue C) [REP5-126] to [REP5-135]), both in terms of the desk-based and field-based assessment, the Applicant considered properties around the margin of the 200 m zone. The Applicant also took into account the Landscape Institute's Technical Guidance (LI TGN 02/19) ¹⁵, which specifically states that 150m was the limit from which a threshold could be breached for overhead lines. Therefore, the Applicant considers it to be unlikely that there are other properties of a similar nature. The Applicant also clarified that as stated in Paragraph 13.2.4 of the RVAA, there may be properties that may have a high magnitude of effect occurring in that zone but that it is unlikely that these properties would break the threshold. The Applicant agreed to respond in writing to confirm the numbers of properties. Post Hearing Update

¹⁵ Landscape Institute (2019) Residential Visual Amenity Assessment Technical Guidance Note 2/19

Item No.	ExA Description	Applicant's Response
		There are approximately 370no. residential properties located between 200-300m of the permanent above ground elements of the Project. Paragraph 13.2.4 of ES Appendix 13.4 Residential Visual Amenity Assessment Parts 1 to 4 [REP5-126] to [REP5-135] (the RVAA) recognises that properties outside of the 200m Study Area may experience significant visual effects. It highlights that: <i>'Although there is the potential for significant visual effects to occur beyond this distance, such effects are not considered likely to affect 'living conditions'.</i> Essentially, they are not anticipated to cause a breach of the 'Residential Visual Amenity Threshold' (RVAT). The RVAT is defined in paragraph 2.1 of LI TGN 02/19 as the point <i>'at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance'</i>. Paragraph 13.2.26 of the RVAA ([REP5-126] to [REP5-135]) states that the RVAT is judged by considering whether the Project, for example blocks the only available view from a property, is overwhelming in views in all directions from the property, is unpleasantly encroaching and / or is inescapably dominant from the property. Visual effects on residential receptors beyond the Study Area are assessed more broadly in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
5.4j	Residential Visual Amenity Assessment Are the measurements for the 200m cut-off taken from the curtilage of the affected properties?	Oral Summary of the Applicant's Case The Applicant noted that it is acutely aware that gardens and driveways are equally important to receptors in this regard and confirmed that the measurements were taken from the curtilage of the affected properties (see paragraph 13.2.4 of ES Appendix 13.4 Residential Visual Amenity Assessment Part 1 [REP5-126]). Applicant's Comments on Matters Raised by IPs In response to the question on Glebe Cottage and whether it had been considered in the assessment, the Applicant confirmed that Glebe Cottages is actually three properties (numbers 1, 2 and 3 Glebe Cottages) and these are all included in ES

Item No.	ExA Description	Applicant's Response
		Appendix 13.4 Residential Visual Amenity Assessment Part 1 [REP5-126], using the property code C15 (see Table A13.4.3 and Table A13.4.26).
5.4k	Veteran trees Please can the Applicant confirm the current status with regards to veteran trees?	Oral Summary of the Applicant's Case There are 112 veteran trees and four veteran tree groups along the route. The last we reported there were four that were identified to be removed. This is now down to one tree that currently remains identified to be removed. The retention of veteran trees has been a result of micro-siting and modelling of the tree's canopy and future growth rates, in addition, two veteran trees were associated with the small realignment in relation to the MoD discussions. The Applicant agreed to submit further information on the specific trees and how they will now be not affected. Applicant's Comments on Matters Raised by IPs In response to the question raised about the definition of a veteran tree, the Applicant confirmed that it has used the definition within the NPPF guidance, which is based on age, size, and condition. This is defined within the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) [APP-236] and the 7.4 Outline Landscape and Ecological Management Plan - Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]. The Applicant noted that there are around eight different definitions of veteran trees, and has applied quite a stringent, robust methodology in terms of surveying and what features and characteristics it was looking for, but that it is not just down to age. The Applicant agreed to respond in writing to confirm the definition it has used in the assessment. Post Hearing Update The Applicant has adopted the National Planning Policy Framework (NPPF, 2024) definition for veteran trees, which is stated as a '<i>A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species.</i>'

Item No.	ExA Description	Applicant's Response
		Survey methodology was set out in the 6.19 Scoping Report [APP-296] including appendices B to K. Appendix J of the Scoping Report sets out the Arboriculture Strategy and states in the that veteran trees would be assessed using <i>‘an industry accepted assessment methodology (such as ‘Raven’) or verified via the Woodland Trust’s Ancient Tree Inventory program’</i>. The response from Natural England dated 27 July 2022 in Appendix 2 of 6.20 Scoping Opinion [APP-297] <i>‘generally accepted’</i> the survey methodology for assessing veteran trees. Arboricultural surveys undertaken using this methodology between 2022 and 2025 recorded a total of 112 veteran trees and four veteran groups. Action Point 15: Provide further specific details as to how impacts on individual veteran trees have been avoided. The impacts on veteran trees have been avoided through an iterative design process. 5.15 Design Development Report [APP-122] explains the principal changes to the route alignment, infrastructure siting and technology in response to feedback received during consultation and also describes alternative alignment options considered as part of the Environmental Impact Assessment (EIA) process and associated data collection. Veteran trees are referenced throughout the DDR, with information on veteran trees informing the selection of preferred alignments. The Environmental Statement assumed four veteran trees would require removal for the construction of the Project. This assessment was based on the reasonable worst-case scenario, with impacts likely to be reduced in detailed design. Following additional arboricultural surveys (necessary to inform detailed design) and collaboration with the technical experts, veteran tree loss as a result of the Project has been reduced. The details of how the number of veteran trees lost has been reduced from four trees to one are detailed below: • One veteran oak (AIA ref. T296) on Wickham Road (north of pylon RG125) has now been reported as affected managed. T296 was previously shown as removed due to overhead line. Early efforts to design out impacts proved difficult with other significant receptors (including veteran trees north of this) will be over-sailed by the overhead line with mitigation applied in the form of bespoke crown management.

Item No.	ExA Description	Applicant's Response
		The technical solution developed at the request of the Ministry of Defence reduced the flexibility in the LoD across several pylon locations. This reduced flexibility allowed for a fixed design to be produced that would ensure two veteran oaks (AIA ref. T328 and T329) north of Bell's Lane would not be removed. As a result, T328 has been recorded as affected managed and T329 recorded as potentially affected. The impact to T328 is likely to be limited to a selective crown reduction to provide the required clearance from conductors. The proposed management has been assessed against detailed survey data and applied in line with arboricultural best practice, BS 3998:2010 and in line with the mitigation hierarchy detailed in Table 7.1 of 7.4 Outline Landscape and Ecological Management Plan [Revision F].
5.4I	AOB – Spoil bunds Is there any more detail to explain how the permanent spoil bunds will look, such as cross-sections, or detail on the size, mass, slope angles, whether they would be planted or landscaped?	Oral Summary of the Applicant's Case The Applicant confirmed that spoil bunds are indicative at this stage and there are no cross-sections or details at the moment. The detailed design work would confirm the volume of cut and fill required. The Applicant agreed to take this away in writing. Action Point 16: Provide further indicative details on permanent spoil bund hatches including parameters of size, mass, heights, slope angles, potential landscaping and consideration of effects on surrounding landscapes and nearby heritage assets. Provide information on how the finer details would be agreed and controlled, and how the spoil bund hatches would be monitored and managed in the long term, including in relation to the control of invasive species. The design of the proposed permanent spoil bunds (mounding) and planting will comply with Horlock Rules Guideline 9 and the good design tests in NPS EN-1 in terms of existing landscape character and landform. Indicative locations for mounding are shown in 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [Revision C]. The mounding generated from construction phase excavation will seek to achieve a cut and fill balance of material at each substation and CSE compound site. The formation and initial monitoring of mounding will be undertaken in accordance with

Item No.	ExA Description	Applicant's Response
		good practice soil handling measures detailed in the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [Revision C]. The mounding will be designed to be subtle in terms of appropriate heights and slope profiles, in particular relating to outward facing slopes. Native scrub and woodland planting will also be incorporated in accordance with 7.4 Outline Landscape and Ecological Management Plan [Revision E] to minimise adverse landscape and visual effects. The Applicant envisages in line with 7.4 Outline Landscape and Ecological Management Plan [Revision E] the following maximum design parameters for mounding: • Height 3 m • Slope angle 1:3 (design objective to seek to minimise slope angle to 1:5 and external facing slope angles to 1:10 or shallower, where practicable) The historic environment assessment (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]) and landscape and visual impact assessment (6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]) have assumed the presence of the mounding and planting within the Environmental Areas. As explained in paragraph 5.3.8 of 7.16 Design Approach for Site Specific Infrastructure (DASSI) [Revision D] <i>'there would be opportunities for the relevant Local Planning Authorities to suggest minor changes to the planting palette and/or request minor changes to the earthworks and extent of planting, subject to these changes being non-material, in general accordance with the outline LEMP and compatible with the detailed design of underground services and drainage and above ground easements related to infrastructure'</i>. The mounding is proposed within areas that will be monitored and managed for BNG for 30 years, which will also take into account the control of invasive species.

2.2 Item 6: Noise and Vibration

Table 2.2 provides a summary of the oral case provided by the Applicant at ISH4 and also the Applicant's response to matters raised by IPs under Item 6 of the agenda, where appropriate.

Table 2.2 Item 6 (Noise and Vibration)

Item No.	ExA Description	Applicant's Response
6.1 Update concerning Primary Access Route 30 (Bentley Road)		
6.1a	Update concerning Primary Access Route 30 (Bentley Road): Update concerning Primary Access Route 30 (Bentley Road) and the magnitude of impact on noise sensitive receptors (both noise and vibration impacts) and mitigations proposed.	Oral Summary of the Applicant's Case The Applicant said it will put the response in writing due to a key witness taking ill. Applicant's Comments on Matters Raised by IPs In response to Tendring District Council, who does not consider it appropriate to defer mitigation to a post-consent discharge of requirements, the Applicant confirmed that it would respond in writing. However, it noted that if the shared haul road (primary mitigation) is agreed then the detailed mitigation will have been done in vain. The Applicant knows the traffic flows, what mitigation is needed to reach the targets and also knows that the reduction is achievable by usual mitigation measures. It is not unusual given the stage in the process, for the absolute detail to be dealt with safely by the LPAs in due course. Action Point 17a: Provide further information on the potential to utilise the North Falls/ Five Estuaries haul road off Bentley Road, including if it would be fit and capable of use by the proposed development. If fit and capable for use by the proposed development: a) when will a decision regarding the use of the haul road for the proposed development be made? At this stage, the Applicant cannot rely upon the availability of the North Falls and Five Estuaries substation access road within the cable construction corridor between Bentley Road and Ardleigh Road as part of the Project's construction strategy. Whilst discussions have taken place regarding the potential for use of the haul road and Norwich to Tilbury, North Falls and Five Estuaries have contractually agreed to cooperate on a range of matters, the Applicant does not currently have confirmation of the timing of its delivery, availability or operational arrangements. Consequently, the Applicant cannot be certain that the haul road would be available when required by the Project.

Item No.	ExA Description	Applicant's Response
		Details relating to the potential for coordinated access proposals are summarised in Appendix B.1 of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]. Action Point 17b: Provide further information on the potential to utilise the North Falls/ Five Estuaries haul road off Bentley Road, including if fit and capable for use by the proposed development: b) how will that use be secured? (i.e. by virtue of a commitment within the code of construction practice, by a requirement within the development consent or by some other mechanism) For the reason given in response to Action Point 17a, it would not be appropriate for the DCO to include a Requirement mandating use of the North Falls and Five Estuaries substation access road within the cable construction corridor between Bentley Road and Ardleigh Road, as the Applicant cannot demonstrate that compliance with such a Requirement would be within its control or capable of being delivered. The construction strategy and environmental assessment have therefore been prepared on the basis that the Proposed Development is deliverable without reliance on the North Falls/Five Estuaries haul road. Furthermore, Five Estuaries and North Falls would need to comply with their relevant DCOs including around the periods they are in occupation of land, cessation of temporary possession and commitments to reinstate land and vegetation, especially hedgerows, so the Applicant cannot be required to use something at a time where doing so would be in conflict with the other projects DCO requirements and obligations, Notwithstanding this position, the Applicant recognises the potential benefits that use of the haul road could provide if it is available at the relevant time. The Applicant has added an additional commitment within Table 6.1 of 7.2 Outline Code of Construction Practice [Version F] requiring consideration of this matter at a later stage. This reads as follows: The Applicant will review the availability and suitability of the North Falls and Five Estuaries substation access road within the cable construction corridor between Bentley Road and Ardleigh Road for use by the Project during construction. The review will consider whether the haul road is operational, available at the required time, capable of accommodating the proposed construction traffic and can be utilised without adversely affecting the delivery of either project. Where the review identifies that use of the haul road is reasonably practicable and feasible, the Applicant will incorporate its use within the final Construction Traffic Management Plan.

Item No.	ExA Description	Applicant's Response
		The Applicant has a Tripartite Position Statement with Five Estuaries and North Falls at Appendix B.1 of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296] which summarises the potential for coordinated access proposals. Action Point 18: Respond to Tendring DC's comments regarding the ExA's question concerning the applicant's response to ExQ2 DCO 2.S8, where Tendring DC's views were sought on the applicant's suggestion concerning the potential to utilise the North Falls/ Five Estuaries haul road off Bentley Road, mitigation measures (standard and bespoke) and comments regarding vibration from construction traffic on the public highway. In response to comments from Tendring District Council, commitment NV24 of 7.2 Outline Code of Construction Practice [Revision F] secures noise mitigation at properties along Bentley Road significantly affected by construction traffic noise. Specific mitigation measures are not required to be known at this stage. The specific mitigation measures will be determined by the Main Works Contractor(s), agreed with Tendring District Council, and installed where required prior to the start of works. This is secured by Requirement 4 of 3.1 Draft DCO [Revision F]. Vibration from road traffic is caused by irregularities in the road surface and would not occur at significant levels where the road surface is well maintained by the relevant local highway authority. This matter was scoped out of the ES on this basis, as agreed with the Planning Inspectorate in 6.20 Scoping Opinion [APP-297], ID 3.12.2.
6.2 East Anglia Connection Node (EACN) Substation		
6.2a	Operational Noise Assessment Cumulative figures in Table A14.3.10 indicate this will be 35 dB LAr,Tr for all Noise Sensitive Receptors. The Applicant was asked to confirm whether these figures are correct.	Oral Summary of the Applicant's Case The Applicant confirmed that the values are correct. The cumulative limits are set at 35 overall, and then individual limits that add up to 35 have been assigned to each of the three substations based on their proximity to the nearest receptors, so the limits add up to 35. The noise level at each individual substation will not be above those values and therefore the cumulative level will not be above 35.
6.2b	Noise mitigation	Oral Summary of the Applicant's Case

Item No.	ExA Description	Applicant's Response
	How can the ExA can be satisfied the 'Potential Mitigation Options' [APP-259] at Table A14.3.7 (Indicative Mitigation Options) will be adequately secured and delivered to the satisfaction of the relevant local authorities	The values in Table A14.3.7 do not necessarily add arithmetically. For the purpose of the assessment of the mitigated scenario, the Applicant has only assumed a standard enclosure and the cooling attenuation. There's been no additional screening or plant selection applied in the assessment. National Grid has specification limits for its transformers. There is a procurement process to ensure that noise transformers are not higher than the specification level. It is the procurement process rather than a mitigation saying it can be up to 10dB. Therefore, the assessment only assumes the 20dB from a standard enclosure and 14dB from the standard cooling measures with the worst-case noise level from the transformers. Therefore, it's a worst mitigated scenario and would certainly be no worse but could be potentially better. The mitigation options set out in Table A14.3.7 of 6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259] are adequately secured by commitment NV21 of the CoCP. This requires that the new substations will include any required noise mitigation measures by design, and this identifies plant selection, siting, screening, enclosures as potential mitigation options. The Applicant will update NV21 Deadline 6 to include a clear mechanism for securing agreement with the LPA to state that an operational noise report will be prepared by the Applicant, setting out the final substation plant noise levels, site layout and design, and the specific mitigation measures that will be proposed. The report will be submitted to the relevant planning authorities for approval prior to construction, in this case Thurrock Council for Tilbury North Substation and Tendring District Council for the EACN. The Applicant will also carry out post-commissioning noise compliance measurements to demonstrate to the LPA that the noise limits are not exceeded. Post Hearing Update Commitment NV21 7.2 Outline Code of Construction Practice [Revision F] has been updated at Deadline 6 to include noise limits for Tilbury North substation (noise limits for the EACN substation are already included in Requirement 14 of 3.1 Draft DCO [Revision F]), together with a mechanism requiring submission of detailed operational noise assessments to Tendring District Council and Thurrock District Council for the EACN and Tilbury North substations, respectively, for approval prior to construction. Additionally, the NV21 commits the Applicant to undertaken post commissioning noise compliance measurements to demonstrate that the noise limits are not exceeded.

Item No.	ExA Description	Applicant's Response
6.2c	Requirement 14 of the draft DCO set the noise rating level for standard operations at the EACN i) What does dB LAr, Tr actually represent ((LA - Level Audible), (r - reference), (Tr – Time reference). This includes: a) What is r? Is it LA90 (background), LAeq (energy level) or other? b) What is the time reference (Tr)? c) Bearing in mind BS4142:2014+A1:2019 has been referenced elsewhere in the requirement is Tr nighttime or daytime?	Oral Summary of the Applicant's Case Put simply dB LAr,Tr is the noise rating level of an industrial noise source as defined by British Standard 4142: Methods for Rating and Assessing Industrial and Commercial Sound. It is the standard metric used in the assessment of operational noise of an industrial or commercial nature, including substations. It describes the noise from the source being assessed, the dB LAr, where dB means decibels of sound, L means sound level, and the suffixes after the L describe the specifics of the level being described. In this instance, the 'A' means that the sound level is 'A weighted', and that essentially represents how humans hear sound. Sound occurs at a whole range of frequencies, most of which cannot be heard by humans, the A weighting corresponds to what we can hear. R is the rating level and is the specific sound level of the source i.e. the actual level if you measured it with a sound level meter at the receptor location, with any adjustment added for the character of the sound (as a penalty), such as tonality, impulsivity, or intermittency, which can increase its perceptibility. The penalties mean that source need to be lower if it displays certain characteristics, providing additional protection. For substations, the main adjustment is in relation to tonality because electrical plant can produce tonal sound. It is standard practice, as a worst-case, to include a 6dB penalty. For example, if there was a 20dB specific sound level of the substation at a certain distance, you would add 6dB penalty to that, to get a rating level of 26dB. Tr means the time period over which the level is assessed. BS4142 normally uses a one hour assessment period during daytime and a 15-minute assessment period at night. This is to capture the worst-case time periods from sources where the sound level varies over time, for example if a factory has an item of equipment that kicks in intermittently over the course of an hour. The night-time period is shorter (15 minutes) because it is more sensitive. For substations, the sound is generally steady and there is no stopping and starting. The rating level would be the same over whatever time period was used, whether 15 minutes, one hour or three years. The assessment has been based on the night-time period because it's quieter and the lower background then gives a worst-case.

Item No.	ExA Description	Applicant's Response
6.2d	ii) Why have the levels in the requirement been set as they have, given with mitigation you indicate dB LAeq (with mitigation) would achieve better than dB LA90 (nighttime)?	Oral Summary of the Applicant's Case The 35dB limit has been set for the EACN because the existing night-time background sound level is low and the noise rating level is also low. In that situation, BS 4142 recognises that the assessment should not just look at the comparison of the background level to the rating level, but should also consider as part of the context whether the sound rating level is low in absolute terms, irrespective of what the background is. Therefore, the Applicant has compared the substation noise level against other guidance, including British Standard 8233, World Health Organisation guidance and guidance from the Association of Noise Consultants. This indicates that an external level of 35dBA noise rating level is low and would provide appropriate internal noise levels, including at night, even with open windows, and would be below the point at which adverse effects would occur. In policy terms, it means that 35dBA represents the lowest observed adverse effect level. The World Health Organisation say 40dB, so 35dB is lower than that. This level therefore ensures that policy requirements are met. Policy does not require that the DCO secure limits below that, where no adverse effect is expected, However, the Applicant stated that the 35dB limit is actually above and beyond policy requirements because the policy requirements are to avoid significant adverse effects, and mitigate and minimise adverse effects. Therefore, setting the limit relative to the LOAEL is essentially below the adverse effect level. The Applicant agreed to provide further explanation in writing explaining what is stated in the different sets of guidance regarding the acceptability of the 35dB threshold i.e. BS 4142, WHO and the institute of noise consultant's guidance. Action Point 21: In response to the ExA's question concerning why the decibel noise levels in requirement 14 of the draft DCO had been set as they have, the applicant referred to comparing the substation noise level against other guidance, including BS8233, World Health Organisation guidance and guidance from the Association of Noise Consultants. The applicant stated guidance indicates that an external level of 35 dBA noise rating level is low and would provide appropriate internal noise levels, including at night, even with open windows, and would therefore be below the point at which adverse effects would occur. The applicant was asked to provide evidence supporting their statements on this matter and to demonstrate and explain why a 35 dBA noise rating level would be acceptable in this instance, especially when ES appendix 14.3 entitled 'EACN Substation Operational Noise Assessment'

Item No.	ExA Description	Applicant's Response
		[APP-259] states: i. you have used BS 4142:2014+A1:2019 to undertake the assessment of operational noise (Section 14.2); ii. the significant observed adverse effect level (SOAEL) rating level is equal to or greater than 35 dB L_{Ar,Tr} or 10 dB above the background sound level (≥ 35 dB L_{Ar,Tr} or ≥ 10 dB), whichever is higher and (paragraph 14.2.11); and iii. the summary of representative background sound levels, table A14.3.2, demonstrates representative background noise levels at its chosen monitoring locations of between 21 and 25 dBLA₉₀ (Nighttime). Additionally, the ExA requests an explanation as to why you are seeking to establish the noise rating level as equal to or greater than 35 dB L_{Ar,Tr} or 10 dB above the background sound level (≥ 35 dB L_{Ar,Tr} or ≥ 10 dB), whichever is higher (SOAEL) rather than seeking to achieve either No Observed Effect Level (NOEL) or as a worst case scenario the Lowest Observed Adverse Effect Level (LOAEL). Please note the ExA is aware of the government guidance for the Method implementation document (MID) for BS 4142 dated 22 December 2023, which advises: “You must not use BS 8233 to assess noise pollution from an industrial or commercial sound. BS 8233 is a method to identify sound insulation requirements from constant sound sources such as traffic or railways. It does not take into account any acoustic features such as tonality, impulsivity intermittency [or] other distinguishable features usually associated with industrial and commercial sound sources...” The ExA also notes this element of the proposed development is a substation so the loading will vary, so tonality will vary. The assessment of operational noise from the proposed substations has been undertaken in accordance with BS 4142. As part of the BS 4142 standard, the assessor must consider context. Part of the consideration of context is the absolute level of the sound, particularly where the background sound level and noise rating level are low, as is the case for the EACN. In the examples provided in BS 4142, BS 8233 is specifically referenced as providing guidance in such situations. As such, BS 8233 has not been used to assess noise pollution from an industrial or commercial sound, but rather, has been used as part of the BS 4142 assessment for context. The following paragraphs provide an explanation as to why 35 dB L_{Ar,Tr} is an appropriate limit considering both guidance and policy. The initial part of a BS 4142 compares the noise rating level to the background sound level. The greater the difference between the rating level and the background sound level; the greater the impact, depending on context, which includes consideration of the absolute level of the sound.

Item No.	ExA Description	Applicant's Response
		With regards to the absolute level of the sound, BS 4142 states that where both background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background, particularly at night. The 2019 version of BS 4142 does not define 'low' in the context of background sound levels or rating levels. However, Association of Noise Consultants guidance states that the values stated in the 1997 version would not be unreasonable; namely: low background sound levels as being less than about 30 dB L_{A90}, and low rating levels as being less than about 35 dB L_{Ar,Tr}. BS 4142 also refers to other guidance, such as BS 8233 in relation to context and absolute sound levels. Reference may also be made to other applicable guidance, such as World Health Organization (WHO) Guidelines for Community Noise¹⁶, and WHO Night Noise Guidelines for Europe¹⁷. The WHO Guidelines for Community Noise and BS 8233 provide recommended guideline values for internal and external amenity spaces, including bedrooms, living rooms, and gardens, albeit for 'anonymous' noise sources, such as road traffic. The guidance values for desirable conditions are: • Bedrooms at night internally: 30 dB L_{Aeq,8h}; • Living rooms and bedrooms during the day internally: 35 dB L_{Aeq,16h}; • External amenity spaces (gardens): 50 dB L_{Aeq,16h}. With regards to internal sound levels, consideration must be given to reduction in sound level through a partially open window, which may be required for ventilation. WHO Guidelines for Community Noise and BS 8233 indicate that the reduction in sound level through a partially open window is 15 dB (attenuation through closed windows would be expected to be in the region of 25 dB). Assuming a 15 dB reduction, the corresponding external sound levels for desirable conditions are: • Outside bedrooms at night: 45 dB L_{Aeq,8h}; and • Living rooms and bedrooms during the day: 50 dB L_{Aeq,16h}. It is noted that the guideline value for reasonable conditions in external amenity areas is the same as the guideline value outside of habitable spaces during daytime periods (i.e. 50 dB L_{Aeq,16h}).

¹⁶ World Health Organisation (1999) *Guidelines for Community Noise*

¹⁷ World Health Organisation (2009) *Nigh Noise Guidelines for Europe*

Item No.	ExA Description	Applicant's Response
		The WHO Night Noise Guidelines indicates that the lowest observed adverse effect level (LOAEL) is 40 dB $L_{night,outside}$ (this is the same as 40 dB $L_{Aeq,8h}$ externally). The above guidance values therefore indicate that a suitable external sound level outside a dwelling at night is 40 to 45 dB $L_{Aeq,8h}$ for the achievement of suitable internal conditions. Taking a precautionary approach, 40 dB $L_{Aeq,8h}$ is therefore a reasonable LOAEL. It is acknowledged that the sound is of an industrial nature and therefore a 5dB reduction to take account of this is considered a precautionary approach, and aligns with the Association of Noise Consultants guidance. Further still, the absolute sound levels will be lower still owing to any acoustic character penalties; in this case 6 dB for tonality (BS 4142 allows a penalty of up to 6dB for tonality, dependant on how total the sound is. The full 6dB penalty is therefore precautionary and in practice a full 6dB penalty would not be warranted). The absolute sound level, assuming at the limit, would therefore be in the order of up to 29 dB $L_{Aeq,8h}$ externally (i.e. 35 dB $L_{Ar,15minutes}$ - 6dB). This is therefore more than 10dB below the 40 dB $L_{Aeq,8h}$ LOAEL. Assuming 15 dB attenuation through an open window, internal sound levels would be approximately 14 dB $L_{Aeq,8h}$; some 16 dB below the recommended upper limit. With closed windows, sound levels would be even lower. As such, a 35 dB $L_{Ar,Tr}$ limit provides a precautionary limit for suitable internal (and external) sound levels with reference to appropriate guidance. With regards to planning policy, the NPPF, NPSE, Planning Practice for Noise, EN-1 require that significant adverse effects are avoided and adverse effects are mitigated and minimised. As the proposed limit is for sound levels to be below the LOAEL, the requirements of planning policy are achieved. Additionally, the cumulative 35 dB $L_{Ar,Tr}$ limit, together with the North Falls and Five Estuaries projects, has been agreed with Tendring District Council, and the corresponding individual limits have secured in both the Norths Falls and Five Estuaries DCO (Requirements 17 and 15 of the North Falls and Five Estuaries DCOs, respectively). Applicant's Comments on Matters Raised by IPs In response to Ms Marshalls question about how the baseline noise surveys were undertaken, the Applicant noted that the baseline survey was undertaken over between seven and twelve days in September and October 2022. Details can be found in Appendix 14.3 EACN Substation

Item No.	ExA Description	Applicant's Response
		Operational Noise Assessment of Chapter 14 Noise and Vibration of the equipment used and what background noise levels were recorded. It is a moot point, because the area has been identified as having low background noise levels. Further baseline surveys would not change this conclusion. The Applicant has used 35dB as an appropriate limit based on policy and the lowest observed adverse effect level for a low background noise level. The noise modelling assumes downwind propagation in all directions as a worst case in the calculations, as part of the ISO 9613 standard. In relation to Ardleigh Parish Council's question on the nature of the sound from the substation, the Applicant noted that with a rating level of 35dB, there would be a low-frequency sound emanating from the transformers, but the mitigation would be designed to specifically address this. With a rating level of 35dB, which is what the Applicant is seeking as the cumulative level, that equates to a specific sound level of approximately 30dB. 30dB on its own equates to what the standard for acoustic suitability of spaces would give to a meditation space. As a comparison, 40dB is the lower level used when designing libraries and museums. It would be barely noticeable and on most occasions would just form part of the ambient sound.
6.2e	iii) Why are only six properties referenced in Requirement 14 when 13 are identified in [APP-259]?	Oral Summary of the Applicant's Case The assessment considered 13 receptor locations within the 1km study area. The reason only six properties are listed in requirement 14 is that they are the nearest receptors. If the limits are met at those nearest properties, then the levels of the properties further away would also be controlled. This is a standard approach to securing noise limits. Also, at greater distances it can become more difficult to reliably measure the specific sound level from the source because it's more easily affected by other local noise sources, so adding limits at more distant properties would not improve protection, and could risk making the requirement essentially unnecessary, difficult to enforce and unreasonable in planning terms.
6.3 Noise and Vibration Management plan		
6.3a	Noise and Vibration Management plan (NVMP) (NV05 in the Outline Code of Construction Practice (CoCP) [REP5-139]). How	Oral Summary of the Applicant's Case The detailed NVMP is secured through Requirement 4 of the DCO and commitment NV05 in the CoCP. These set the overall framework for managing construction noise and vibration, including the mitigation, monitoring and reporting. Requirement 4 states that these documents must be submitted to and approved by the LPA before construction.

Item No.	ExA Description	Applicant's Response
	will the need for any ongoing consultation/authorisation be undertaken once it has initially been discharged by the relevant planning authorities?	If a change was needed to a management plan once it had been approved, it would follow the change management process described in section 5.5 of the NVMP, which also sets out the process for agreeing the change with the LPAs. There would be ongoing engagement with the LPA throughout construction, in terms of monitoring requirements, any exceedances and reporting. For specific activities where there is potential for significant adverse effects, or where works are proposed outside of the core working hours, further authorisation will be sought through the Section 61 process. That gives the LPAs a further opportunity to review and agree proposed methods, predicted noise and vibration levels, mitigation and monitoring for those specific activities. In principle, the NVMP and Section 61 process will mirror each other, it is just another stage of securing controls. The Applicant is updating the Outline NVMP at Deadline 6 to better reflect the position on noise monitoring and associated reporting following the comments received from the LPAs. This will actively secure monitoring in the NVMP through agreement with the LPA via Requirement 4 of the DCO, rather than, as it currently states, through the Section 61 process or following complaints to provide the LPAs with reassurance on this. The Applicant said it would respond in writing to the ExAs question on how the enforcement process is triggered should the LPA receive a noise complaint, e.g. who would respond and how. Action Point 22a: Respond to comments made by Braintree DC regarding the Noise and Vibration Management Plan, as identified in the outline Code of Construction Practice [REP5-139] at NV05, including whether a stage is missing in the process regarding local authorities needing to approve the document. With regards to the comment from Braintree District Council and the ExA on a request for LPA approval of the noise assessment, the Applicant confirmed that the noise assessment undertaken by the main work contractor would be submitted as part of the NVMP to the LPA for approval, via Requirement 4 of 3.1 Draft DCO [Revision F]. Commitment NV05 has been updated in 7.2 Code of Construction Practice [Revision F] at Deadline 6 to clarify this point. Action Point 22b: Respond to comments from both Braintree DC and Babergh DC and Mid Suffolk DC's regarding the complaints and enforcement procedures related to the Noise and Vibration Management Plan, especially in regard to compliance monitoring, reporting and enforcement, and how these procedures will operate in practice.

Item No.	ExA Description	Applicant's Response
		7.2 Outline Code of Construction Practice Appendix F Outline Noise and Vibration Management Plan [Revision C] has been updated at Deadline 6 to clarify the position around compliance monitoring, reporting and enforcement. In summary, it clarifies that noise and/or vibration monitoring will be undertaken at locations identified by the Main Works Contractor(s) in accordance with protocols agreed with the relevant local planning authorities prior to the start of works. Reporting protocols will be agreed with the local planning authorities as part of the detailed Noise and Vibration Management Plan prior to the start of works and implemented in accordance with the agreed protocols. Construction noise and vibration level and temporal thresholds for significant adverse effects are stated in the Outline Noise and Vibration Management Plan, together with actions in the event of exceedances of the noise and vibration threshold levels, and outline actions in the event of repeat exceedances, including liaison with and reporting to the relevant local planning authority. Unless otherwise agreed with the relevant LPA in the detailed NVMP or Section 61 agreement, in the event of a construction noise or vibration threshold level exceedance, the responsible Main Works Contractor(s) will implement the following measures: • Notify National Grid of the exceedance • Immediately undertake an investigation of construction/removal activities on site to ascertain if any work activities are being implemented contrary to specified noise or vibration control measures. If the exceedance is directly attributable to the Project, then the specific work activity suspected of causing the exceedances will be stopped as soon as it is safe to do so, and the Main Works Contractor(s) will determine why the appropriate measures of the NVMP were not being implemented • Remedial measures will be determined and implemented where appropriate to ensure no repeat of the construction noise or vibration threshold level exceedance, or to ensure the exceedance does not occur for a duration sufficient to cause a significant adverse effect. • Work activities identified to have caused the exceedance will not be allowed to continue/resume until the remedial measures have been implemented • Identify and rectify causes of the exceedance • Record actions taken to identify and rectify the exceedance

Item No.	ExA Description	Applicant's Response
		• If the cause of the construction noise or vibration threshold level being breached is not related to site operations, record the outcome of the investigation once the investigation is completed • Report the above to the relevant LPA according to any agreed protocol. Unless otherwise agreed with the relevant LPA in the detailed NVMP or Section 61 agreement, in the event of a series of repeated exceedances of the construction noise or vibration threshold levels within a short period of time (for example, should exceedances occur over three consecutive days) the following course of action will be taken by the Main Works Contractor(s): • Identification of exceedances • Following identification of an exceedance, determine whether the exceedances are directly attributable to the Project • Inspection of all works currently being undertaken at the relevant construction site or area to determine if the noise and vibration control measures, as outlined within the NVMP and/or Section 61 consents, are being implemented appropriately • Confirmation of the root cause of the exceedance. If the exceedance is identified to have been caused by a third party, details and location of third-party activities will be recorded and communicated to the third party, if appropriate. If the exceedance is directly attributable to the Project, then the specific work activity suspected of causing the exceedance will be stopped as soon as is safe to do so and the Main Works Contractor(s) will determine if the appropriate measures of the NVMP and/or Section 61 consent were being implemented. Remedial measures will be identified and implemented to ensure there are no exceedances of the appropriate construction noise or/and vibration level and temporal thresholds due to the Project. Work activities determined to have caused the exceedance will not be allowed to continue/resume until the remedial measures have been implemented • Within 48 hours of the exceedance of three or more sequential exceedances, the Main Works Contractor(s) will investigate to determine which activities and/or decisions resulted in the exceedances occurring. A report detailing the findings of the investigation will be compiled by the Main Works Contractor(s) and provided to National Grid. • Report the above to the relevant LPA according to any agreed protocol. Specific alternative actions may also be agreed with the local planning authorities as part of the detailed NVMP or Section 61 agreement.

Item No.	ExA Description	Applicant's Response
		Complaints, including those related to noise, will be managed in accordance with the detailed complaints procedure secured by commitment GG37 of 7.2 Outline Code of Construction Practice. An outline complaints procedure is provided in Section 2 of 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]. In the interests of providing a timely response, noise and/vibration monitoring in response to a complaint may be undertaken without prior agreement with the relevant planning authority. However, details and results of any monitoring and actions following a complaint will be provided to the relevant local planning authority in accordance with any agreed protocols.
6.4 Any other matters related to noise and vibration arising from deadline 5 submissions		
6.4a	Any other matters	No other matters were raised.

2.3 Item 7: Aviation Safety

Table 2.3 provides a summary of the oral case provided by the Applicant at ISH4 and also the Applicant's response to matters raised by IPs under Item 7 of the agenda, where appropriate.

Table 2.3 Item 7 (Aviation Safety)

Item No.	ExA Description	Applicant's Response
7.1 Aviation Policy Issues		
7.1a	Policy issues, including: - Critical National Priority (CNP) - General matters of aviation safety and risk The ExAs concern is with the phrase 'developments do not present risks to physical safety'. The ExA would be grateful for the Applicant's views on this.	Oral Summary of the Applicant's Case There can be no prospect of the DCO creating an unacceptable risk to public safety or human health. Paragraph 5.5.59 bullet point 1 of EN-1, makes it clear that for a licensed aerodrome, the CAA would simply not maintain a licence to the extent that there was an unacceptable danger or risk to human health. For an unlicensed aerodrome, there is really no difference, because where an operator thinks that the position that's created is unacceptably dangerous, it would be simply inappropriate and unlawful and contrary to the Air Navigation Order 2016 for that operator to continue the operation insofar as it's dangerous. What that means in the circumstances of EN-1 is that the exception to the CNP presumption does not and cannot arise.
7.1b	In your response to SS2.5, you state that, '<i>The operational loss of unlicensed aerodromes, which has brought about the impact of energy infrastructure, is not covered by the requirements of 5.5.59</i>', and that this requirement only relates to licensed aerodromes for a reason. Noting the second bullet point of 5.5.59, which	This paragraph at bullet point 1 identifies what happens if after reasonable mitigation and operational changes there is nonetheless the requirement for the licenced aerodrome to close or lose operational capacity. Where a licensed aerodrome has to close the SoS is only mandated by paragraph 5. 5.59 to give the consequences of that closure that issue specific attention. The SoS is not mandated to give specific attention to the operational loss of an unlicensed aerodrome in terms of bullet point 1 This is because there is a recognition when EN-1 is read as a whole, that licensed airports tend to be more important in terms of socio-economic loss or emergency services needs than unlicensed. This does not mean that if there's a loss of unlicensed capacity, it's not a material consideration, it would still be weighed in the planning balance. The second bullet point relates to the impact generally on aerodromes' (note the plural) training or emergency services needs. This relates to all aerodromes. In the circumstances of the present case of the 21

Item No.	ExA Description	Applicant's Response
	states, <i>'It would cause harm to aerodromes' training or emergency service needs'</i> – doesn't apply to licensed aerodromes. Do you have any view on that?	aerodromes considered, only 19 are operating and the Appellant has agreed positions with 16 aerodromes. There is no evidence of significantly compromising the ability of aerodromes to train or provide appropriate emergency services. The Applicant notes that in relation to the three aerodromes on the project which are asserting potential danger, none are asserting publicly that they would close. It's relevant because it identifies licensed aerodromes as a specific consideration that the SoS has to take into account. There is no such position with unlicensed aerodromes. Tibenham say only two of their seven runways would need to close. The Applicant maintains that there is no safety risk or that there can be a modification. Use of alternate or new runways is one type of modification that can bring about an entirely safe position. Applicant's Comments on Matters Raised by IPs Pylons East Anglia's raised a comment on EN-1 4.2.15 and that an unacceptable risk to or interference with human health and public safety is an exemption to the CNP priority and goes against the NPPF agent of change rule, which is all about unreasonable restrictions. The Applicant's response was that the way in which the agent of change as applicable to aerodromes and new CNI is set out in EN-1, which takes into account the agent of change in those particular circumstances. Post Hearing Update The Applicant's response to SS 2.4 within 8.9.2 Applicant's Responses to Second Written Question [REP5-211] explains how NPS EN-1 (2024) has had regard to the content of the National Planning Policy Framework including those parts dealing with the 'agent of change' principle but emphasises the needs of an aerodrome must be balanced with the need for infrastructure of critical national priority (CNP, paragraph 5.5.5). In terms of mitigation, EN-1 (2024) requires proposals to be designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes but also places expectation on aerodrome operators to regularly review the possibility of reasonable changes to operation procedures (paragraph 5.5.50). Furthermore, the policy recognises the potential for loss of a licensed aerodrome to be acceptable (paragraph 5.5.59).

Item No.	ExA Description	Applicant's Response
7.1c	General matters Please can the Applicant provide examples of aerodromes of a similar type of scale, traffic type usage and proximity to existing overhead lines at similar heights?	Oral Summary of the Applicant's Case The Applicant provided a summary of the following examples of similar aerodromes with overhead lines present: - Thurrock is an aerodrome that has been assessed as part of the project. The aerodrome has been operating successfully for many years with an albeit lower height line in a very similar position to the one that is proposed by the Project in the vicinity of Thurrock and the parties have reached an agreement on where that line will go in relation to the runway. - Peterborough Sibson has been in existence for decades with a 400kV overhead line approximately 600m from the eastern end of one runway. The aerodrome was formerly licensed, and the runways and the obstacle limitation surfaces were in place with that line in existence. These provide a good example of a mixed economy general aviation airfield (involving parachuting), with an overhead line very similar to the one that's proposed here in existence. - Elstree Aerodrome in north London is much busier than any of the 21 aerodromes that have been considered on this project, with between 60,000 to 70,000 movements a year. It has overhead lines running to the north and the west, including one that runs perpendicular to the take-off path from the western runway. It is a licensed aerodrome, so the CAP 168 obstacle limitation surfaces apply. - Baxby is an extreme example of coexistence with a line, in that a full 400kV overhead line runs over the top of the end of the runway. It's a microlight site and flying training takes place there. The aerodrome has made operational changes, such as not approaching under the line but there are sometimes take-offs that take place under it. It is suitably signed and the aerodrome briefs pilots. It is an example of how an overhead line can be situated within the boundary of an aerodrome quite successfully. The Applicant clarified that of those example aerodromes described as either licensed now or previously licensed when the overhead line was in place (Peterborough/Sibson and Elstree) , this means that the CAA is or was satisfied with the safety of the aerodrome as would otherwise revoke or modify the license The Applicant agreed to provide further information on the aerodromes in writing.

Item No.	ExA Description	Applicant's Response
		Action Point 23: Provide further detail, including diagrams, further to the response to ExQ2 SS2.6 regarding other aerodromes which operate safely on a daily basis with electricity infrastructure nearby. The Applicant has responded to this in Annex B: Applicant's Response to Action Point 23.
7.1c	General matters The Applicant's response to SS2.6 includes consideration of appropriate mitigation, such as pre-flight risk avoidance or via normal in-flight operational practice. In your view, are the mitigation options provided reasonable, achievable, and would they restrict the operational or economic existence of any of the aerodromes along the project route?	Oral Summary of the Applicant's Case Mr Jamieson for the Applicant outlined his experience in the aviation field. He is a chartered mechanical engineer with 35 years of general aviation experience. He learnt to fly at 14 years and has flown small and large aircraft for the greater part of his life. Mr Jamieson noted that he flies light aircraft on a regular basis, has a helicopter licence and an air transport pilot's licence for fixed-wing aircraft. He has previously been a glider pilot, including as an aerotow tug pilot. He has undertaken many other roles around general aviation aerodromes, including providing air traffic services at aerodrome flight information service level. Mr Jamieson stated that in the context of the project, he works for Alan Stratford and Associates (ASA), a consultancy specialising in general aviation projects, particularly those where development has an impact on general aviation. The consultancy aims to help general aviation safely coexist with development and that is the goal on the Norwich to Tilbury Project. There are 21 aerodromes identified as being within scope and may potentially be affected on this project. The Applicant has reached agreement with the vast majority of aerodrome operators and the pilots that operate from those. They may not be delighted with the fact that they have a new obstacle in their environment, and the Applicant understands this, but nevertheless, they have found the Applicant's assessment agreeable, and the remaining discussion should be seen in that light. The Applicant is also making progress with the three that remain in discussion.
7.1d	General matters The Applicant's answer to SS 2.6 refers to the involvement of ASA previously in the formulation of your proposals and aviation safety risk. Is there any way the ExA could receive	Oral Summary of the Applicant's Case The Applicant confirmed that Mr Jamieson works for ASA and that he produced the aviation impact assessment within 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [REP4-161]. Applicant's Comments on Matters Raised by IPs In response to the General Aviation Awareness Council (GAAC) comments on the Dr Eddowes report in respect of Tibenham and the comment that the CAA airfields advisory team highlighted

Item No.	ExA Description	Applicant's Response
	confirmation from ASA that they agree with the updated Appendix 15.2?	concerns about Tibenham and Priory Farm, the Applicant said that it has responded to both of these issues already but would provide a signpost in writing to where these can be found. There is also a meeting with Tibenham and the British Gliding Association (BGA) on Monday to further discuss matters. Post Hearing Update The Applicant has responded to the Norfolk Gliding Club Written Representation [REP1-256], which contains the Eddowes Aviation Safety Limited consultancy report, within 8.8.1 Applicant's Comments on Written Representations [REP2-209] (pages 257 to 263) and also in response to SS 1.8 within 8.9.1 Applicant's Responses to First Written Questions [REP3-074] (pages 613 to 618). The Applicant has responded to matters relating to the Civil Aviation Authority Airfields Advisory Team (CAA AAT), including their March 2025 Position Statement, within 8.8.2 Applicant's Comment on Local Impact Reports [REP2-030] (paragraphs 3.17.5 to 3.17.15 refer). 8.4.8 Applicant's Comment on any Further Information or Submissions Received by Deadline 2 [REP3-070] responds to the GAAC's previous written representation on this topic [REP2-050] (see pages 153, 154 and 178). Furthermore Action 05 (first bullet) within 8.5.8 Applicant's Response to Issue Specific Hearing Action Points [REP4-303] (pages 3 to 6) provides a detailed response to the relevant paragraphs of the Position Statement concerning effects on Tibenham aerodrome.
7.2a	Wattisham Station The Applicant provided an update on discussions with the aerodrome operator.	Oral Summary of the Applicant's Case The Applicant is very grateful to the Ministry of Defence (MoD) Defence Infrastructure Organisation (DIO) for the positive engagement, taking the advice in EN-1 fully into account, and being a model in terms of engagement, negotiation and co-existence. The Applicant accepted from the outset that interference with military aviation and defence assets (including but not limited to the Wattisham Station aerodrome) might constitute an unacceptable interference with defence, which would disapply the presumption in favour of CNP. The Applicant and MoD have had positive discussions and a technical solution has been developed within the LoD, so that structures will not impact on the effective operation of the East2WAM navigational network, Wattisham Station aerodrome or military low flying more generally. There are adjustments being made to the design within the LoD to ensure the overhead line structures are within defined limits. There has been no change in pylon type.

Item No.	ExA Description	Applicant's Response
		The Applicant is pleased to note that it is in almost total agreement with the MoD in relation to matters within the SoCG. The outstanding matter is in relation to the exact wording of the requirements. It is the Applicant's understanding that the MoD is content conditionally to remove its objections, subject to the provisions of the order. The Applicant said that it would confirm the nature of the requirements in writing and also agreed to incorporate the agreed wording onto the draft DCO at Deadline 6. Post Hearing Update 3.1 Draft DCO (Revision F) submitted at Deadline 6 contains seven provisions relating to defence and military aviation assets, the precise wording of which is being agreed with the DIO. These provisions encompass: • Restrictions to Project infrastructure heights at two defined interfaces with the East2WAM Network safeguarding zone, and two defined interfaces with the Wattisham Station aerodrome Obstacle Limitation Surfaces (OLS) safeguarding zone • Removal of Project overhead line vertical limits of deviation (LoD) within a defined area of infringement of the aerodrome's Precision Approach Radar (PAR) safeguarding zone • Notification of pylon construction, modification and removal to enable accurate aviation charting and mitigate impacts to military low flying • Notification and safety management protocols for cranes and other temporal structure deployment during construction within the Wattisham Station safeguarding zone specifically, as well as more generally within low flying areas The Applicant and the DIO are now finalising the Statement of Common Ground for submission at Deadline 7.
7.2b	Chase Farm The Applicant provided an update on discussions with the aerodrome operator.	Oral Summary of the Applicant's Case From the very outset, the Applicant made it clear that with the runway in the existing position, that it could not operate safely and would therefore need to curtail its operational capacity. The owner of Chase Farm commissioned a feasibility study from an independent consultant and paid for by the Applicant who confirmed that position. The Applicant undertook an assessment which identified potential mitigation by reorientating the runway. The Applicant's modelling showed this to be safe,

Item No.	ExA Description	Applicant's Response
		and the independent consultant confirmed this. National Grid has agreed in principle to facilitate this change and other mitigation at the site. The Chase Farm agents have been chased weekly, with a view to understanding whether that offer will be taken up. The Applicant is still waiting for a response from the operator. However, the Applicant's current position is that if the operations cease at Chase Farm, it would be a commercial decision and not due to safety, in the event that the reorientated runway is an available mitigation option that is capable of being taken up. Post Hearing Update The Applicant has received no response from the landowner/owner in the period since the hearings and is continuing to pursue this on a regular basis.
7.2c	Priory Farm The Applicant provided an update on discussions with the aerodrome operator.	Oral Summary of the Applicant's Case There was a productive meeting with Priory Farm on 12 June 2026. One of the main learning points that has come from the meeting is that the operator advised they had replotted their circuit patterns and there are now key differences between various circuits currently published. There are two circuits flown at Priory Farm; a low-level circuit at 500 feet above the ground, and a wider, larger circuit, which climbs to a higher height of 1,000 feet above the ground. Both circuits are in use at a pilot's discretion. In general, as the 500-foot circuit is shorter and slightly more demanding to fly, the operator has advised that it is generally limited to smaller aircraft or more experienced pilots. The 1,000-foot circuit is typically used by pilots who are learning to fly or need more time to think about manoeuvres. The Applicant updated its aviation impact assessment based on the new information provided. This showed that the re-plotted 500ft circuit does not appear to overfly the proposed overhead line, however, it is laterally closer to it than previously understood. The Applicant has shared this assessment with the operator and suggested a potential mitigation to the lateral proximity involving a slight change to the 500ft circuit. An alternative mitigation might involve ceasing operation of the 500ft circuit and to just use the 1,000ft circuit, which is a situation that exists at many other aerodromes. The Applicant is setting up a further meeting to discuss these matters in more detail. The Applicant notes that the discussions are progressing productively and is hopeful that more matters will be

Item No.	ExA Description	Applicant's Response
		agreed within the SoCG than at present. Until further discussions are held, the Applicant cannot comment on whether all items will be agreed within the Examination timetable. Post Hearing Update The operator's initial response to the suggested mitigation in terms of a slight amendment to the 500ft circuit is that the proposal would not be feasible due to issues of deconfliction with Tibenham aerodrome air traffic. The Applicant has sought to establish whether the conflict risk is material, suggesting this could be minimised by enhanced pilot awareness through publication of the amended circuit. The Applicant is seeking a meeting to review this further but the operator is yet to confirm their availability.
7.2d	Raydon Wings The Applicant provided an update on discussions with the aerodrome operator.	Oral Summary of the Applicant's Case The Applicant held a further meeting on 15 June 2026, which provided necessary clarity around the operator's existing and proposed operations. The operator remains focused on the location of the CSE compound, and the Applicant was able to discuss the existing aerobatic flying practice that operates from the aerodrome and relates to the operator's concerns. The Applicant has requested further clarification regarding the details of their aerobatic box to understand its relation to the overhead line and the CSE compound, and whether a localised move from the proposed location would provide effective mitigation. The operator has described the diversification opportunities that it has forgone because of the prospect of the runway's closure including a potential training facility and/or a gliding club at the site. Engagement has confirmed the operator is not specifically proposing parachuting activities. Without diversification, the operator's position is understood to be that its business would not be viable. The Applicant has requested further information from the operator on the nature, scale and timing of its operational proposals, including those which they are deciding not to pursue. The Applicant has also agreed to explore the potential to move the proposed underground cable route towards the eastern end of the runway, within its limits of deviation, amongst other mitigation measures, which may allow continued aviation operations, minimising disruption during construction (see Matter 7.7. within 8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP4-245]). The Applicant will set up a further meeting with the operator once it has received the further information and reviewed this against the impact assessments and the mitigation recommendations.

Item No.	ExA Description	Applicant's Response
		Applicant's Comments on Matters Raised by IPs An audience member asked for clarity on whether there was a possibility at Raydon Wings for the CSE compound to move further eastward. The Applicant confirmed that for Raydon Wings, it has referred to potentially moving the underground cable route (not the CSE compound) slightly to the east within the limits of deviation to the benefit of ongoing operations at the aerodrome. The Applicant agreed to clarify this point in writing. Post Hearing Update Since the hearing, the operator has sought clarity on whether the Applicant intends to relocate the CSE compound on safety grounds, separate to consideration of its business proposals. The Applicant is clear that the operator's concerns regarding its existing operations predominantly relate to the safety of aerobatics practice in proximity to the CSE compound, including risk to parachuting following a pilot 'bailing out' in an emergency. The requested information regarding the location of the aerobatics box will inform the Applicant's impact assessment and mitigation proposals in relation to this matter. In the absence of this information, the Applicant is not currently pursuing changes to the location of CSE compound or the overhead line. The Applicant's previous consideration of alternative locations is described in response to Action Point 09 within 8.5.8 Applicant's Response to Issue Specific Hearing Action Points [REP4-303] (pages 13 to 15) and SS 2.3 within 8.9.2 Applicant's Responses to Second Written Questions [REP5-211] (pages 206 to 209). The operator has advised they are assembling information regarding opportunities on hold. They have advised they would have concerns regarding a pilot bailing out of a glider. The Applicant is therefore seeking clarity on the potential for gliding operations to be undertaken at the aerodrome in the future. This clarity will also inform collective consideration of the length of runway to be retained via minor adjustment to the proposed underground cable route to enable continued aviation operations during its construction, should gliding commence in the interim.
7.2e	Tibenham The Applicant provided an update on discussions with the aerodrome operator.	Oral Summary of the Applicant's Case The Applicant has been attempting to engage with the operator to understand their perspective in relation to the proposed project, but that has been frustrated by the operator's rejection of meeting proposals, on the grounds of perceived withholding of information. However, the Applicant is pleased that the operator confirmed yesterday that it will attend a trilateral meeting on Monday with

Item No.	ExA Description	Applicant's Response
		the British Gliding Association (BGA). This follows work that the Applicant has been doing with the BGA, around gliding-specific operational parameters and understanding how they relate to our impact assessments and mitigation options. The last meeting with the BGA was held on 18 June 2026 when the parties discussed the operational parameters and the Applicant agreed to re-visit previous modelling work in relation to glider approaches and competition finishes, based on the BGA's defined parameters. The Applicant noted that the planned discussions will focus on clearance heights and distances. As mentioned, the Applicant has provided the BGA with Tibenham-specific modelling information, to gather their views. The Applicant considers that the meeting will help the parties to reach an agreement on some matters, if not all in the SoCG. The Applicant considers that a safe outcome is possible at Tibenham and does not consider that operations need to stop. Post Hearing Update During the trilateral meeting held on 29 June 2026, the operator's focus remained on the general matters of the Applicant's approach to consultation, consideration of previous CAA AAT feedback on the Applicant's performance-informed assessment methodology, as well as its own position that appropriate mitigation of aviation impacts requires the avoidance of risk via re-routing of the overhead line outside the aerodrome safeguarding zone, or undergrounding. These matters are addressed within 8.3.37 Draft Statement of Common Ground - Tibenham Aerodrome [REP4-249] in which the Applicant suggests they are unlikely to be resolved between the Applicant and the operator. The Applicant also explained its position most recently within its response to SS 2.3 in 8.9.2 Applicant's Responses to Second Written Questions [REP5-211] (pages 201 to 215). The meeting focused on discussion of gliding-specific operational parameters and key assumptions, involving the presentation of ASA draft modelling based on BGA -derived parameters and Tibenham's site-specific circumstances, and subsequent discussion of implications for impact assessment and mitigation consideration. During the meeting, the BGA and the Applicant agreed that the presence of the Project as an obstacle inherently increases risk to Tibenham gliding operations. The BGA commented that the modelled parameters evidenced that a broad range of risks to gliding operations can mostly be mitigated to be manageable through changes to operational procedures to ensure appropriate overhead line clearances were achieved. The BGA and the operator raised that low flying approaches at shallow angles carried greater risk. The Applicant position is that this risk can also be mitigated through reasonable changes to operational

Item No.	ExA Description	Applicant's Response
		procedures. In relation to competition flying, the BGA advised the operator hosting events could put in place local measures in relation to finishes to adjust to the presence of the obstacle, clarifying this was not dependent on the BGA's modification of overarching competition rules. The BGA commented it was ultimately for pilots to determine what was safe operationally and how to respond to risk, not the BGA, but recognised glider pilots could be risk-cautious and may avoid events at Tibenham as a result of the Project obstacle. The operator declined to comment further within the meeting but the Applicant will continue to engage both the operator and the BGA regarding matters outstanding and will be submitting an updated and final SoCG at Deadline 7.
7.2f	Latest updates and discussion arising on aerodromes:	Action Point 24: Continue positive dialogue with the aerodromes where matters are outstanding. Provide an update on how you are working towards resolution of outstanding matters and towards resolution via the statements of common ground. The Applicant has provided updates on progress with individual operators in the week following the hearings and is continuing to engage stakeholders to finalise SoCG for Deadline 7, focusing on resolving matters that remain under discussion to agreed or not agreed in order to provide clarity to the Examining Authority. The Applicant recognises the potential for some stakeholders to not sign the SoCGs, noting the operator of Tibenham aerodrome made a statement to this effect within the hearings. Where this may be the case, and the Applicant's advice for SoCGs to be signed with matters disagreed if necessary is not heeded, the Applicant intends to submit the latest available version to reflect the current status of engagement.
7.3 Any other aviation related issues		
7.3	Any other aviation related issues	No other matters were raised.

2.4 Item 9: Any Other Matters

Table 2.4 provides a summary of the oral case provided by the Applicant at ISH4 and also the Applicant's response to matters raised by IPs under Item 9 of the agenda, where appropriate.

Table 2.4 Item 9 (Any Other Matters)

Action No.	ExA Description	Applicant's Response
9.1a	Rule 17 letter The Rule 17 letter requested the Applicant's comments on responses from category 1 and category 2 affected persons objections to the compulsory acquisition or temporary possession of their land by Deadline 6 [PD-028].	Oral Summary of the Applicant's Case The Applicant has sent in an email for clarifications to the Rule 17 letter, where it suggested that it prepares a freestanding, independent document that covers each response. It has started work on commenting on the responses and there are many that can be dealt with quickly. However, from its initial review, the Applicant does not think it to be practicable to undertake a thorough review and response to all the responses by Deadline 6. Therefore, the Applicant requested that it does as much as it can by Deadline 6, with the remainder of the exercise following at Deadline 7. Post Hearing Update The Applicant has provided further details in 8.6.6 Deadline 6 Cover Letter [Revision A] .
9.1b	Other consents and licences Please can the Applicant give an update on the status of these?	Oral Summary of the Applicant's Case The Applicant provided a summary on consents, licences and other agreements in 5.5 Consents and Licences Required Under Other Legislation [REP5-077] at Deadline 5. It will also submit an updated version of this document at Deadline 7 which will be the full and final update. There have been no changes made that are worth raising at this point.
9.1c	Legal agreements The ExA asked for a updated list of legal agreements and the timescales for when these would be	Oral Summary of the Applicant's Case The Applicant confirmed that at this time of the hearing draft legal agreements were being considered and progressed in relation to the following matters: • Section 85 of the Countryside and Rights of Way Act duty in respect to the Dedham Vale National Landscape • Off-site tree planting associated with the 3:1 commitment for individual trees

Action No.	ExA Description	Applicant's Response
	submitted into Examination	• Offsite Biodiversity Net Gain (BNG) • Joint police forces funding • Landscape and visual compensation/enhancement/offsetting in location specific areas There are also ongoing discussions outside of the Examination relating to community funds, Planning Performance Agreement funding for local authorities, developers forum meetings, and Section 278 highway agreements. The Applicant will submit updated versions of some of the legal agreements at Deadline 6, if available, noting that some may be unsigned due to the required governance process and the signed version will follow at Deadline 7. The Applicant has very recently received the LPA comments on the Section 106 agreement (discussed earlier in the agenda) and is reviewing this in terms of the proposed measures in relation to landscape and visual and other compensation. There are ongoing discussions with the LPAs to in relation to this document. In terms of BNG, the Applicant is proposing a unilateral undertaking due to the number pf parties that would be involved (e.g. 13 LPAs), which is typical for this type of agreement. The logistics and governance process associated with a bilateral agreement and the governance process to obtain signatures would likely extend beyond the Examination timetable. The unilateral agreement is still under s106 and enforceable because these are single Applicant obligations that don't require reciprocal covenants from the other authorities. The Applicant will submit a short accompanying report with any draft or final agreement submitted at Deadline 6 and Deadline 7, explaining the approach and what's in it. Post Hearing Update Whilst the Applicant originally proposed a s106 unilateral undertaking to secure offsite BNG and offsite tree planting subject to the 3:1 commitment, following further consideration the Applicant is proposing to secure these measures through 3.1 draft DCO [Revision F] in the form of requirements, which was updated at Deadline 6 to reflect this change.
9.1d	Statements of Common Ground (SoCG) Will the SoCG be updated to reflect the agreements and when	Oral Summary of the Applicant's Case The Applicant has submitted 11 final signed SoCG into Examination. There are a number of additional SoCG that the Applicant intends to submit as final and signed at Deadline 6. The SoCG we will also identify where we have legal agreements with the third parties. 5.9 Draft Statement of Common Ground – Overview [Revision F] has been updated at Deadline 6 to show the current status of each.

Action No.	ExA Description	Applicant's Response
	will these be submitted for each local authority?	The Applicant is confident that the SoCGs with statutory stakeholders, including LPAs, are on course for being signed and agreed by Deadlines 6 and 7. That does not mean to say everything will be agreed. It means the document will be agreed, which will set out the items that are or are not agreed with the party. There may be a few SoCGs that are not signed. These will be primarily with the third-party commercial parties where there may be financial measures that are still being discussed. In such cases, it is not unusual for a third party to not want to sign the SoCG until the legal agreement has been signed. The Draft SoCG – Overview will be updated at Deadline 6 and 7 to show where this is the case.

Annex A
Schedule 20
Landscape
Compensation
Offsetting and
Enhancement in
Relation to Specified
Locations

SCHEDULE 20

LANDSCAPE COMPENSATION, OFFSETTING AND
ENHANCEMENT IN RELATION TO SPECIFIED LOCATIONS

Article 55

Commented [ST1]: There would be parent article giving this Schedule operative force:
"Landscape compensation, offsetting and enhancement in relation to specified locations"
55. Schedule 20 (Landscape compensation, offsetting and enhancement in relation to specified locations) has effect."

Interpretation

1. In this Schedule—

"BCIS Index" means (subject to paragraph 2(3)) the General Building Cost Index published from time to time by the Building Cost Information Service of the Royal Institution of Chartered Surveyors;

"contribution" means the sum specified in column 3 of the table in paragraph 2 for the landscape compensation, offsetting and enhancement area and relevant authority for that area specified in columns 1 and 2 of that table;

"landscape compensation, offsetting and enhancement area" means the relevant area described in column 1 of the table in in paragraph 2;

"landscape compensation, offsetting and enhancement measures" has the meaning given in paragraph 4(2);

"relevant authority" means the authority specified in column 2 of the table in in paragraph 2 for the landscape compensation, offsetting and enhancement area specified in column 1 of that table; and any reference in this Schedule to a named relevant authority is a reference to that authority as constituted at the date of this Order and includes any successor body exercising the equivalent functions of that authority as local planning authority;

"reporting year" means each period of 12 months beginning on the anniversary of the date on which the contribution was paid to the relevant authority, except that the first reporting year begins on the date of payment and ends on the first such anniversary; and

"ten-year date" means, in relation to a contribution, the date falling 10 years after the date on which that contribution was paid to the relevant authority.

Commented [PG2]: Index tbc

Payment

2.—(1) National Grid must pay to the relevant authority set out in column (2) of the table below the corresponding contribution or contributions set out in column (3) of that table in relation to the landscape compensation, offsetting and enhancement area or areas set out in column (1) of that table [prior to the commencement of the authorised development within the area of that relevant authority][prior to the commencement of the authorised development within the landscape compensation, offsetting and enhancement area to which that contribution relates]—

(1) <i>Landscape compensation, offsetting and enhancement area</i>	(2) <i>Relevant authority</i>	(3) <i>Contribution</i>
Waveney Valley (including Snow Street, Roydon, Royden Fen and Wortham Ling), being [OPTION 1 the area shown]edged [●] and identified as [●] on sheets [●] of the [●] plans ^a [OPTION 2 the area extending to a distance of 2 kilometres from	[●] Council	£[●] ([●] pounds)

Commented [PG4]: It is proposed that the payment of the contributions is made to the County Councils for the relevant locations, who can administer the funds with the respective district councils.

Commented [PG3]: Area to be discussed with the LPAs for each location.

^a [If you have a specific plan for the area, which you probably don't]

(1) <i>Landscape compensation, offsetting and enhancement area</i>	(2) <i>Relevant authority</i>	(3) <i>Contribution</i>
the centreline of the pylon route between pylon [JC8] and pylon [J11] ^a as shown on sheets ^b [●] to [●] of the works plans.]		
Gipping Valley	[●] Council	£[●] ([●] pounds)
Burstall and Bramford	[●] Council	£[●] ([●] pounds)
Ardleigh and Little Bromley	[●] Council	£[●] ([●] pounds)
Colne Valley (including Fordham, Ford Street, Aldham)	[●] Council	£[●] ([●] pounds)
Great and Little Waltham	[●] Council	£[●] ([●] pounds)
Ingatestone and Butbury	[●] Council	£[●] ([●] pounds)
Hutton, Mountnessing, Haverings Grove	[●] Council	£[●] ([●] pounds)
Tilbury	[●] Council	£[●] ([●] pounds)

(2) Each contribution specified in column 3 of the table is to be calculated in accordance with the formula $P \times (A \div B)$ where—

- P is the contribution as specified in column 3 of the table;
- A is the figure for the BCIS Index last published before the date on which the contribution falls due for payment; and
- B is the figure for the BCIS Index last published before the date on which this Order was made,

except that where, at the time a contribution falls due for payment, the value of A is equal to or less than the value of B, the contribution is payable at the amount specified in column 3 of the table (that is, the formula does not operate to reduce the contribution below the amount specified in the table).

(3) Where the BCIS Index ceases to be published, is rebased or is replaced by another index—

- any rebased index is to be applied to the periods before and after rebasing in a fair and reasonable manner;
- any replacement index published by the Royal Institution of Chartered Surveyors or the Office for National Statistics, or any successor body exercising equivalent functions, is to be used in substitution for the BCIS Index; and
- if no replacement index is published under sub-paragraph (b), such other index as National Grid and the relevant authority may agree in writing, each acting reasonably, is to be used in substitution for the BCIS Index with effect from the date on which the BCIS Index ceased to be published, and the base index figure is to be adjusted accordingly on a fair and reasonable basis.

Receipt and holding of contributions

3. On receipt of a contribution, the relevant authority must—

- hold it in a designated account, separate from the authority's general funds, which must be an interest-bearing account; and

^a [For example]

^b [You'd need to mention all the sheets in between as well]

- (b) ensure that all interest arising on any sum held in that account is credited to the account and treated as part of the contribution for all purposes of this Schedule.

Use of contributions

4.—(1) Each relevant authority must apply the contribution paid to it exclusively for the purpose of carrying out the landscape compensation, offsetting and enhancement measures applicable to the landscape compensation, offsetting and enhancement area to which that contribution relates, as described in sub-paragraph (2).

(2) Landscape compensation, offsetting and enhancement measures mean measures which—

- (a) improve the landscape character of the area through the establishment of new trees, woodland, hedgerows or other appropriate planting;
- (b) soften views of the authorised development where this is reasonably capable of being achieved through landscape planting;
- (c) strengthen existing landscape structure and habitats by extending, restoring, improving or connecting established woodland, hedgerows, shelterbelts and other green infrastructure;
- (d) soften the integration of the authorised development within the surrounding landscape through planting that reflects local landscape character and settlement pattern;
- (e) deliver planting using species and designs that are appropriate to local landscape character, environmental conditions and long-term resilience;
- (f) deliver planting that avoids giving rise to unacceptable adverse effects on heritage assets, known archaeological interests, ecological features, agricultural operations, flood risk or other environmental constraints;
- (g) improve public rights of way and public amenity within the area (including way markers and inclusive assistive measures); or
- (h) any other measures which reasonably contribute to the objectives of landscape compensation, enhancement or offsetting in the relevant landscape compensation, offsetting and enhancement area

and must be carried out within the landscape compensation, offsetting and enhancement area to which the contribution relates.

(3) The relevant authority may retain from the contribution a sum not exceeding 10% of the total amount received, including interest accrued, to meet its reasonable administrative expenses arising from—

- (a) carrying out the landscape compensation, offsetting and enhancement measures applicable to the landscape compensation, offsetting and enhancement area to which that contribution relates; and
- (b) complying with its obligations under this Schedule in relation to that contribution.

(4) The relevant authority may carry out landscape compensation, offsetting and enhancement measures itself or may fund third parties to carry out such measures on its behalf.

Accounting records

5.—(1) Each relevant authority must—

- (a) keep accounting records in respect of each contribution paid to it throughout the period during which any part of that contribution remains in the designated account; and
- (b) retain those records for a period of not less than 6 years after the date on which all sums in the designated account have been expended or otherwise dealt with in accordance with this Schedule.

(2) National Grid is entitled, on giving not less than 5 business days' written notice to the relevant authority, to inspect and take copies of the accounting records kept under sub-paragraph (1).

Annual reports

6.—(1) Each relevant authority must prepare an annual report in respect of each contribution paid to it for each reporting year.

(2) Each annual report must be submitted to National Grid within 56 days after the end of the reporting year to which it relates.

(3) Each annual report must set out—

- (a) a description of the landscape compensation, offsetting and enhancement measures carried out during the reporting year;
- (b) the amount of expenditure incurred from the contribution during the reporting year, distinguishing between expenditure on landscape compensation, offsetting and enhancement measures and administrative expenses;
- (c) the balance of the contribution (including interest accrued) remaining in the designated account at the end of the reporting year; and
- (d) the relevant authority's proposals for expenditure during the next reporting year.

Unspent contributions and revised measures

7.—(1) Where, on the ten-year date, any part of a contribution (including interest accrued in the designated account) remains unspent or uncommitted, the relevant authority must, within 20 business days after the ten-year date, either—

- (a) apply in writing to National Grid for approval to apply the unspent or uncommitted balance to such revised landscape compensation, offsetting and enhancement measures as are specified in that application, together with an explanation of why the measures described in paragraph 4(2) have not been fully carried out and why the proposed revised measures are appropriate; or
- (b) repay to National Grid the unspent or uncommitted balance together with interest in accordance with sub-paragraph (5).

(2) National Grid must, within 20 business days of receiving an application under sub-paragraph (1)(a), notify the relevant authority in writing whether it—

- (a) approves the proposed revised measures;
- (b) approves them subject to modifications specified in the notification; or
- (c) refuses approval, giving reasons.

(3) Approval under sub-paragraph (2) must not be unreasonably withheld or delayed.

(4) Where National Grid approves revised measures under sub-paragraph (2)(a) or (b), those measures take effect as the landscape compensation, offsetting and enhancement measures for the relevant landscape compensation, offsetting and enhancement area for all remaining purposes of this Schedule, and the relevant authority must apply the unspent or uncommitted balance to them accordingly.

(5) The relevant authority must repay to National Grid the unspent or uncommitted balance of the contribution together with interest accrued on that balance in the designated account where—

- (a) the relevant authority does not make an application under sub-paragraph (1)(a) within 20 business days of the ten-year date; or
- (b) the relevant authority has made such an application and National Grid has refused approval under sub-paragraph (2)(c) and the parties have not (acting reasonably) agreed revised measures within a further period of 20 business days after that refusal.

(6) Repayment under sub-paragraph (5) must be made within—

- (a) in the case of sub-paragraph (5)(a), 20 business days after the ten-year date; or
- (b) in the case of sub-paragraph (5)(b), 10 business days after the expiry of the further period referred to in sub-paragraph (5)(b).

(7) In this paragraph a sum is “uncommitted” if, at the ten-year date, it is not the subject of a binding contract or formal grant commitment entered into by the relevant authority for the carrying out of landscape compensation, offsetting and enhancement measures.

Disputes or differences

8. Any dispute or difference arising between National Grid and a relevant authority under this Schedule must, unless otherwise agreed between National Grid and the relevant authority, be referred to and settled by arbitration under article [64] (arbitration).

Annex B

Applicant's Response to Action Point 23

1. Action Point 23. To provide further detail, including diagrams, further to the response to ExQ2 SS2.6 regarding other aerodromes which operate safely on a daily basis with electricity infrastructure nearby.

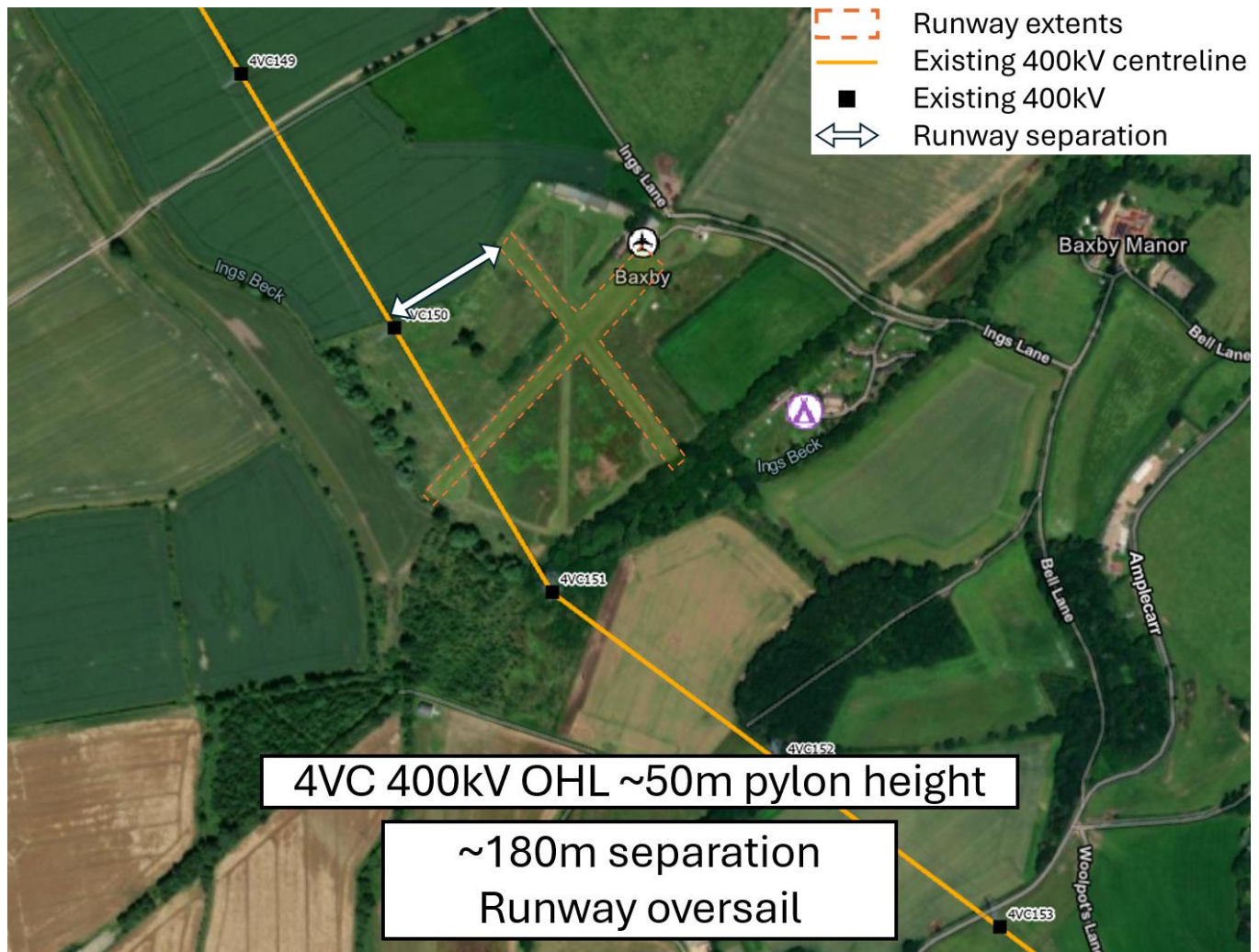
1.1 Introduction

- 1.1.1 The Applicant provides the following details regarding examples of UK aerodromes which currently co-exist and operate with overhead lattice pylon transmission and distribution lines in their proximity.

1.2 Baxby

- 1.2.1 Baxby Aerodrome in North Yorkshire is a General Aviation aerodrome used primarily by microlight aircraft and other Short Take-off and Landing (STOL) types. There is a flight school on site and flight training is a primary activity here (see aerial image at Figure 1).

Figure 1: Aerial Image of Baxby Aerodrome with 4VC Overhead Line in Vicinity



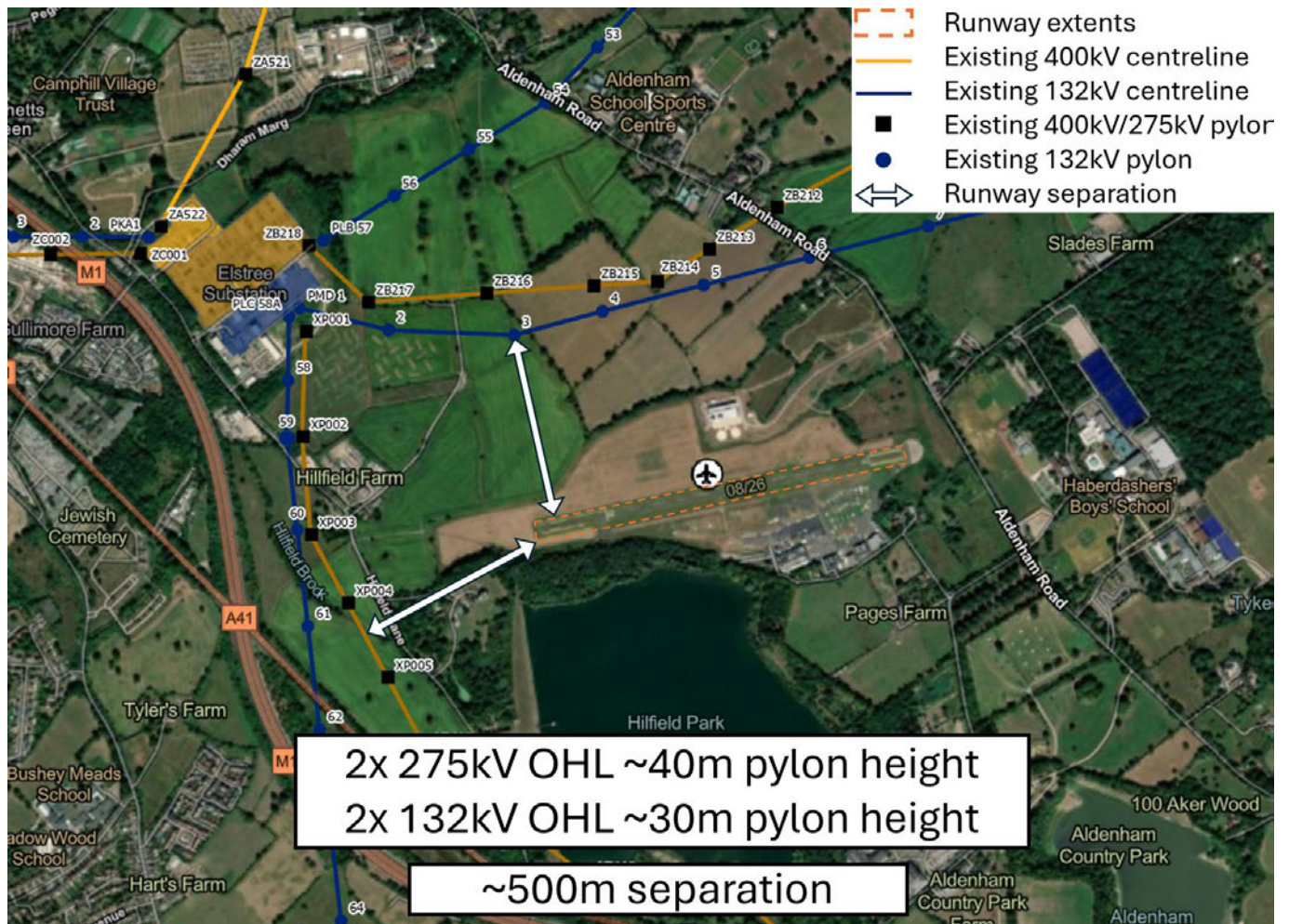
Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

- 1.2.2 National Grid's 400kV 4VC (Lakenby to Thornton) overhead line route, consisting of pylons approximately 50m tall, is perpendicular to and directly oversails the western end of Runway 23 (midspan). The overhead line is in close parallel proximity (approximately 180m) to other runways.
- 1.2.3 The aerodrome provides an extreme example of co-existence with an overhead line. Circuits do not overfly the overhead line but take-off or go-around from Runways 19 or 23 involves flight under the line, which is not an operational procedure Alan Stratford and Associates (ASA, the Applicant's appointed aviation experts) has recommended for the Project. It is unclear from published data whether there are restrictions to the use of these runways (for take-off or landings only, for example, as may be expected to be the case).

1.3 Elstree

- 1.3.1 London Elstree is a licensed aerodrome which operates with a range of General Aviation traffic, including both fixed and rotary wing types. Its movements are approximately 50-60,000 per annum, making it one of the busiest General Aviation facilities in the UK (see Figure 2).

Figure 2: Aerial Image of Elstree Aerodrome with Multiple Overhead Lines in Vicinity



Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

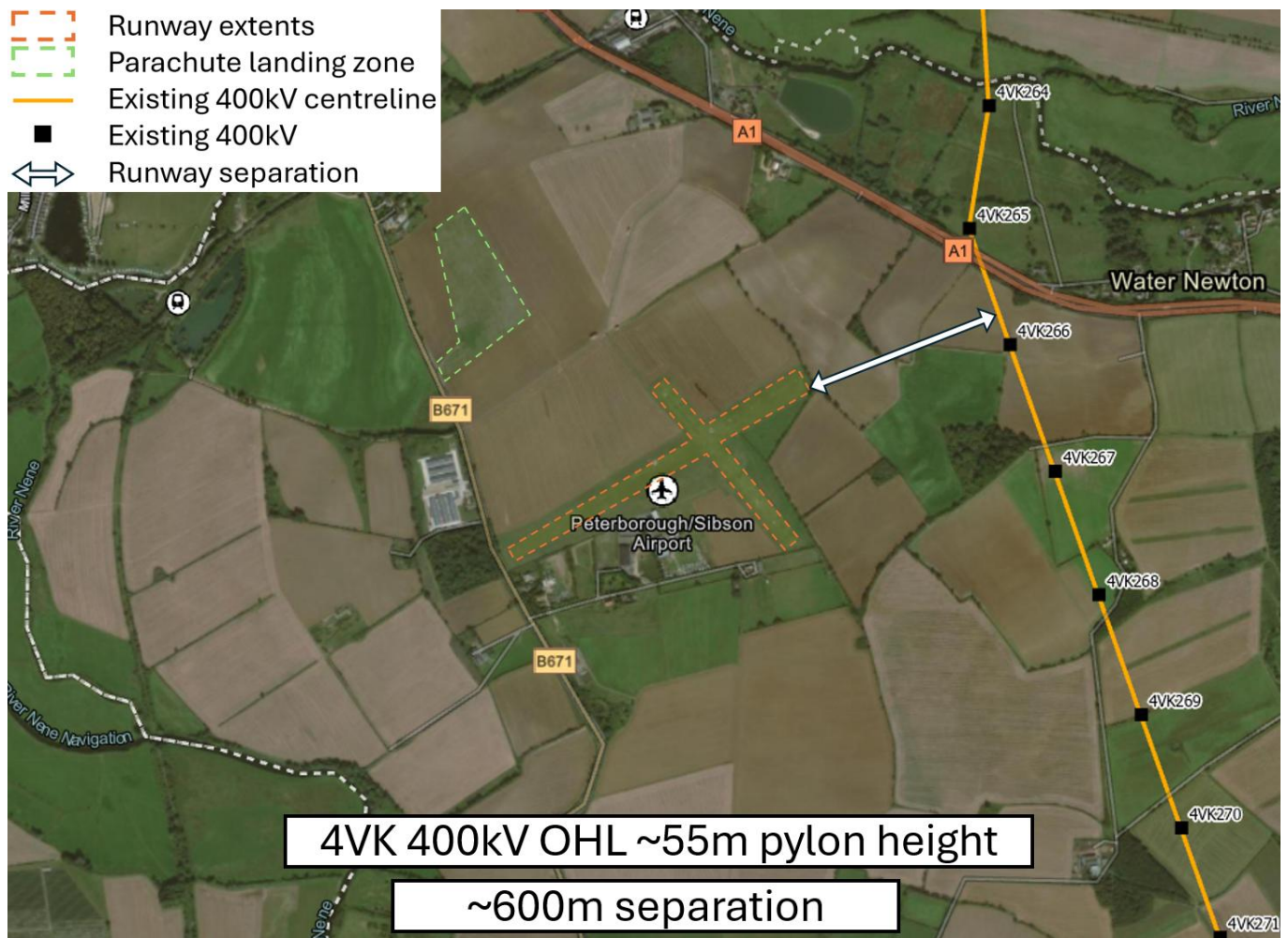
- 1.3.2 To the northern and western aerodrome boundaries are multiple overhead lines within approximately 500m of the runways, including National Grid's 275kV ZB (Elstree to Warley) and XP (Elstree to Mill Hill) routes, both approximately 40m tall. UKPN's PMD (Elstree to South Mimms Tee) and PLC (Elstree to Hatch End) routes, approximately 30m in height, also feature. Other aviation constraints (in relation to forced landing risk, for example) include Elstree substation appropriately 750m to the northwest, the M1 motorway 750m to the west, a reservoir to the south, and a school and woodland to the east.
- 1.3.3 Overhead lines cross the aerodrome take-off and approach pathways, and circuits overfly the lines. The aerodrome complies with the Civil Aviation Authority's CAP 168¹ standard in relation to Obstacle Limitation Surfaces (OLS), as is required for its status as a licensed aerodrome. ASA calculated clearances over the overhead line are comparable to those of Thurrock (a 4 degree approach to runway 08 has a clearance of is approximately 21m at Thurrock and 30m at Elstree, see also below).

¹ Civil Aviation Authority (2025) CAP 168 Licensing of Aerodromes

1.4 Peterborough Sibson

- 1.4.1 Peterborough Sibson in Cambridgeshire is a General Aviation aerodrome, with a flight school on site as well as a freefall parachute business (and associated dropzone). Flight training is the primary activity at the aerodrome. The parachute landing zone is approximately a quarter of a mile to the north of the two runways (see Figure 3). The aerodrome was formerly licensed (with the overhead line in existence in its current alignment) and is now unlicensed.

Figure 3: Aerial Image of Peterborough/Sibson Aerodrome with 4VK Overhead Line in Vicinity

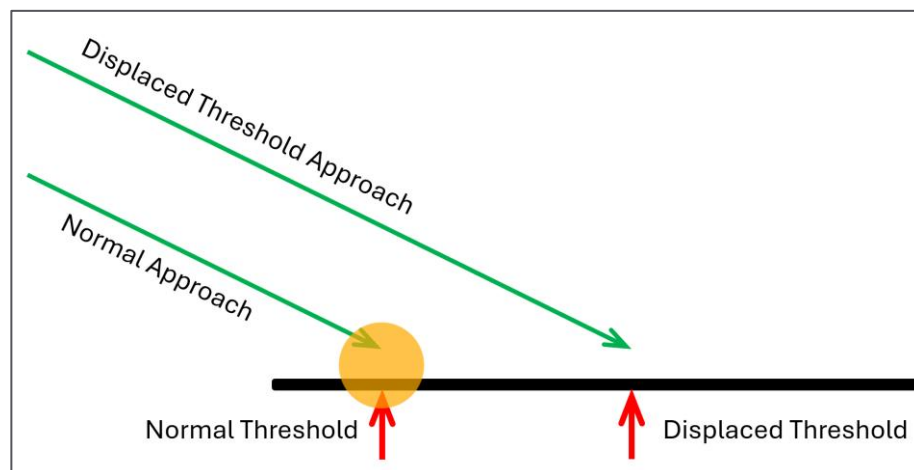


Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

- 1.4.2 The 400kV 4VK (Cottam – Eaton Socon – Wymondley) overhead line route is approximately 600m to the east of the Runway 24 end at its closest point. Pylon heights within 1 km of the aerodrome vary in height and are on average approximately 55m tall. Another notable constraint to aviation (for forced landing risk) is the A1 dual carriageway to the northeast of the aerodrome.
- 1.4.3 Operator and pilot information indicates take-off climbs and approaches overfly the overhead line, achieving a clearance of approximately 31m (100ft) on the Runway 24 approach. Circuits overfly the overhead line from all runways.
- 1.4.4 The threshold of Runway 24 is permanently displaced due to the presence of the overhead line, providing appropriate clearance of the obstacle on approach. A displaced threshold is a marked point beyond the physical beginning of a runway

beyond which aircraft should land after their approach (see Figure 4). In this case, the displaced threshold was a former requirement for the aerodrome (when licensed) to comply with CAP168. The introduction of a displaced threshold as a mitigation measure has not been recommended for aerodromes within scope of the Project as, with the exceptions of Chase Farm and Thurrock (see below), the Applicant has assessed take-off and landings to comply with CAP168.

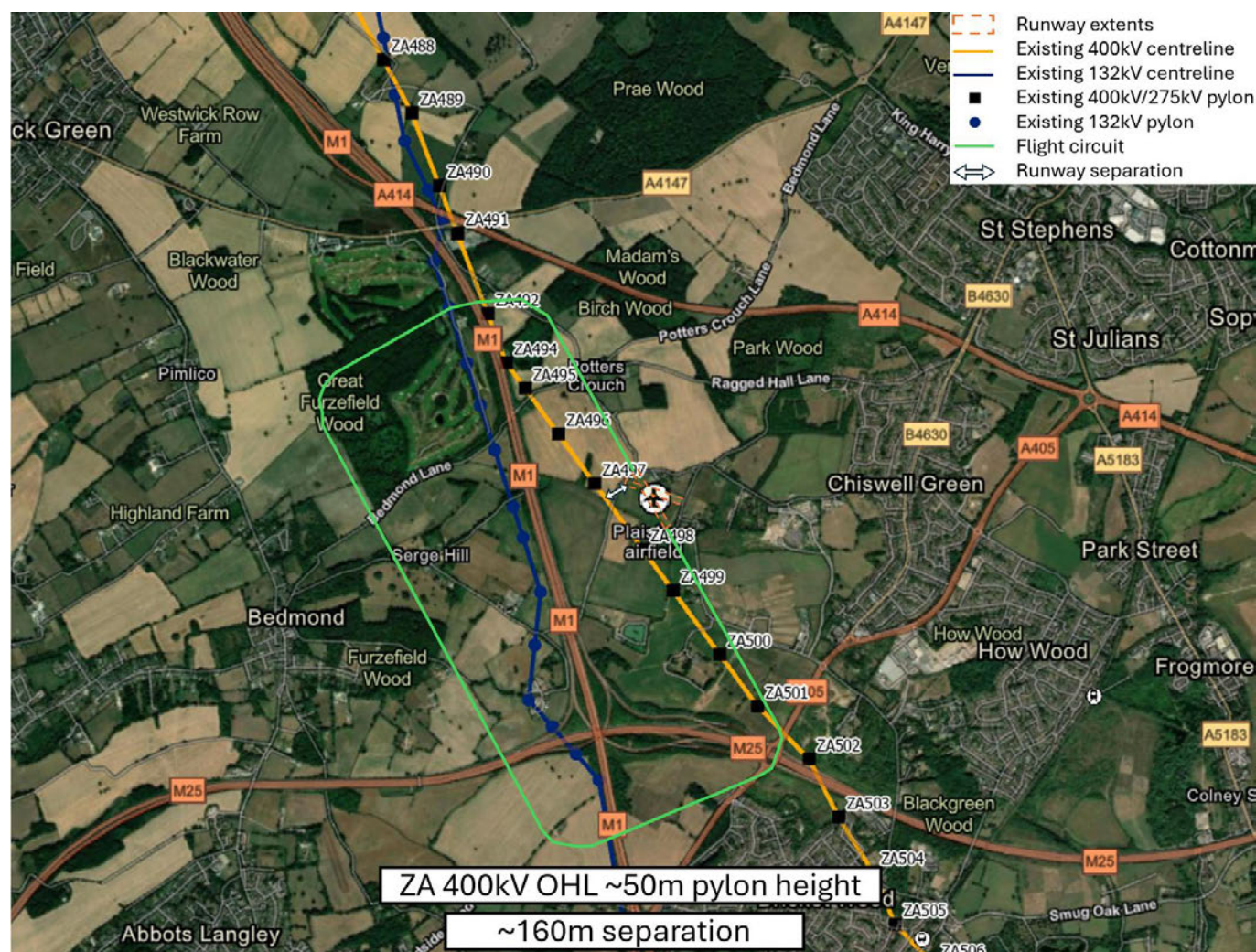
Figure 4: Displaced Threshold Approach



1.5 Plaistows Farm

- 1.5.1 Plaistows Farm in Hertfordshire is a busy aerodrome used by microlight aircraft. Flight training also takes place at the site. Circuits are flown at a height of 800ft (244m) (see Figure 5).
- 1.5.2 The aerodrome runway is in close parallel proximity to National Grid's 400kV ZA (Elstree to Sundon) route. At its closest the runway is approximately 160m from the overhead line. Published circuits show overflight of the overhead line. The circumstances of the overhead line and aerodrome locations and the nature of their interactions are very similar to those of the Project and Priory Farm aerodrome.
- 1.5.3 The distance to the line at Plaistows Farm for the 800ft circuit is almost identical to that for the 500ft circuit at Priory Farm. As such, aircraft clearance over the line would be similar, with aircraft at Plaistows continuing to climb to their higher circuit height (this has no effect on line clearance). The aircraft types at Plaistows and Priory Farm are broadly similar in performance, although Priory Farm is likely to have a wider variety of types both based there and visiting.

Figure 5: Aerial Image of Plaistows Farm Aerodrome with ZA Overhead Line in Vicinity

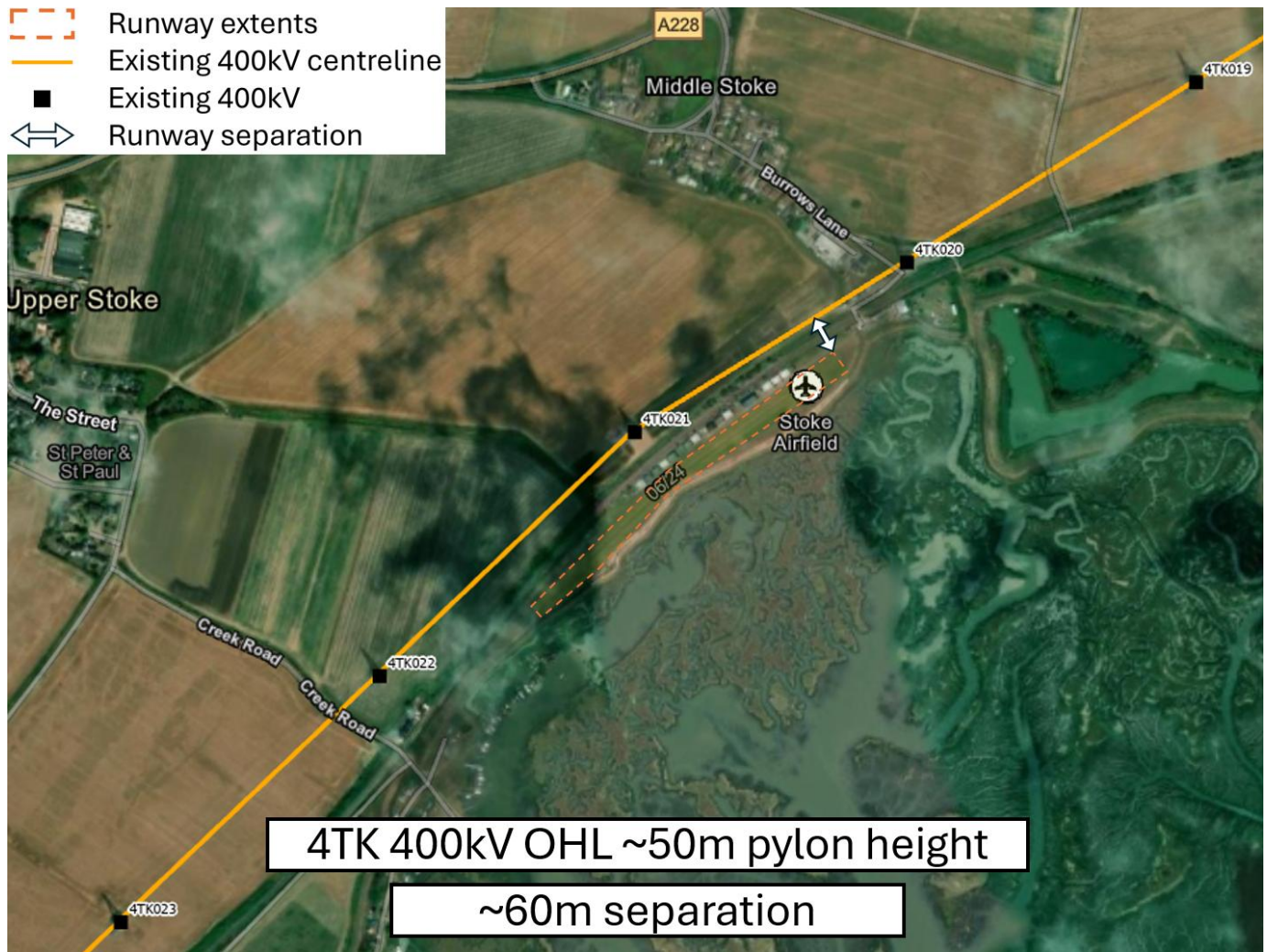


Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

1.6 Stoke Medway

- 1.6.1 Stoke Medway aerodrome in Kent is relatively small, used primarily for microlight aircraft. There is a flight school on site and pilot training activities are conducted here.
- 1.6.2 National Grid's 400kV 4TK (Grain to Tilbury / Grain to Kingsnorth), with pylons approximately 50m tall, is located parallel to the aerodrome runway, approximately 60m to the north. Other constraints to aviation include marshland directly to the south, and a railway between the runway and the overhead line (see Figure 6).
- 1.6.3 Operator and pilot information indicate that approach and take-off climb paths are parallel to the overhead line and could be as close as 100m (laterally). Forced landing options for pilots in a emergency are limited by the railway, overhead line and the marshes.

Figure 6: Aerial Imagery of Stoke Medway Aerodrome and 4TK Overhead Line in Vicinity

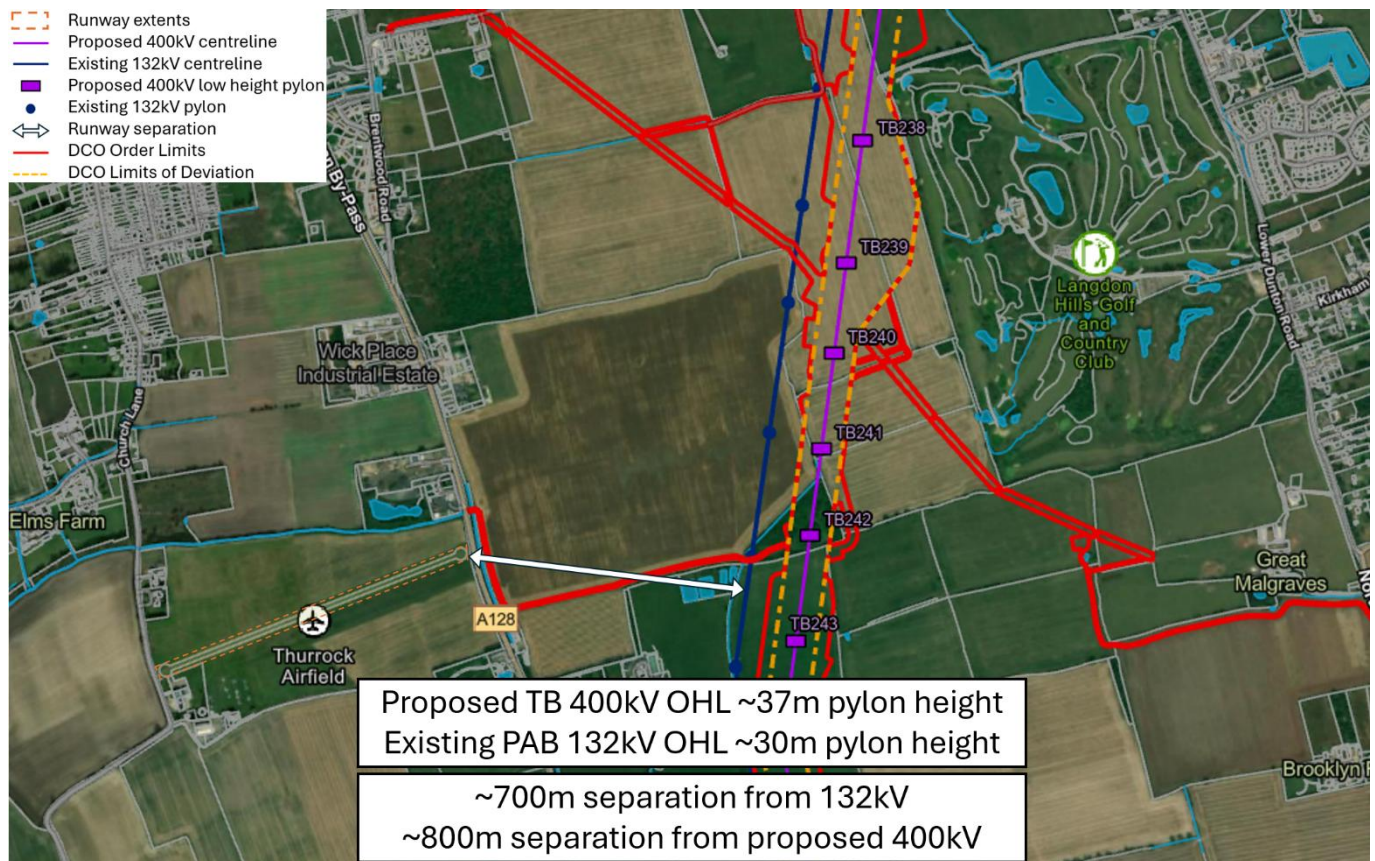


Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

1.7 Thurrock

- 1.7.1 Paragraphs 15.4.19 to 15.4.21 of 6.15.A2 **Environmental Statement Appendix 15.2 – Review of Aviation Impact [REP4-161]** provides information regarding Thurrock aerodrome in Essex, being in the Project's aviation impact assessment scope. The unlicensed aerodrome currently operates with an existing UKPN 132kV PAB overhead line located approximately 700m from the end of its Runway (see Figure 7). CAP 168 OLS compliance for take-off and landing is not achieved for the existing or the proposed Project overhead line. The Applicant's response to SS 2.7 within **8.9.2 Applicant's Response to Second Written Questions [REP5-211]** explains how the design of the proposed overhead line (in terms of its alignment, orientation and height) enables it to benefit from shielding by the predominant existing overhead line structures. The operator has confirmed this design will not be detrimental to the continued operability of the aerodrome (see Matter 6.1 of **5.9.23 Draft Statement of Common Ground - Thurrock Airfield [REP4-097]**).

Figure 7: Aerial Imagery of Thurrock Aerodrome and Proposed and Existing Overhead Lines in the Vicinity



Esri, Vantor, Earthstar Geographics, and the GIS User Community, Map data ©

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