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Norwich to Tilbury

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Document: 8.5.13 Applicant's Response to the Oral Submissions
Made at Open Floor Hearing 4

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nationalgrid

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1. About this Document

1.1 Introduction

- 1.1.1 This document provides the Applicant's written response to the written summary of the oral submissions made by Interested Parties at Open Floor Hearing 4 (OFH4), which was held at 10am on Tuesday 23 June 2026 in relation to the Norwich to Tilbury Project ('the Project').

1.2 Scope of this Document

- 1.2.1 The agenda for OFH4 [EV2-008] from the Examining Authority (ExA) noted that although the Applicant would not be asked to address questions raised by Interested Parties at the OFH, the ExA asked the applicant to respond in writing to what they heard at the hearing.
- 1.2.2 The Applicant has sought to respond to the oral summaries given at OFH4 in this document. It will also be reviewing the oral summaries submitted by third parties at Deadline 6 and will respond to any additional points made in writing but not given at the hearing, where relevant, at Deadline 7.

1.3 Structure of this Report

- 1.3.1 Chapter 2 of this report presents the Applicant's response to general themes raised during the oral submissions, which the Applicant has responded to before. Table 2.1 cross references to where the Applicant has provided an answer previously for each theme. Chapter 3 presents the Applicant's response to the oral submissions given by Interested Parties (IPs) during the hearing. Table 3.1 is structured in the order that the IPs gave evidence.

2. Applicant's Response to Common Themes Raised in the Oral Submissions

2.1 Applicant's Response to Common Themes Made by Parties at OFH4

2.1.1 Table 2.1 sets out the Applicant's response to the common themes raised by more than one IP during the OFH4.

Table 2.1 Applicant's response to common themes raised by parties during OFH4

Party	Common Themes	Applicant's Response
James Cartlidge MP, Chris Whitfield, Alexander Micklem, Caroline Mason, James Abbot, Elizabeth Reynolds, Brumfelda History Group, Broomfield, Roxwell Flood Prevention Group	Strategic Alternatives Consideration of offshore or other strategic options.	The Applicant set out its position on these strategic alternatives in response in Item 5.1 of Table 2.2 in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]. In terms of offshore considerations, the 7.19 2023 - Strategic Options Backcheck and Review [APP-357] sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore alternating current (AC) solution, in line with the National Policy Statement (NPS) EN-1 (2024) and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury project, in line with the transmission and licence obligations. It also assumes that the connection should be largely overhead, as aligned with NPS EN-5 (2024). In terms of undergrounding, paragraph 2.9.21 of NPS EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is only reversed for nationally designated landscapes. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.

Party	Common Themes	Applicant's Response
Chris Whitfield, Dick Lanham and Clare Lanham, James Abbot, Elizabeth Reynolds	Impacts on landowners and residents during construction Some IPs noted that there will be increased noise, dust and light pollution to adjacent properties during construction.	Construction noise will be mitigated using best practicable means as per commitment NV01 in 7.2 Outline Code of Construction Practice [Revision F] to ensure significant adverse effects are avoided. Specific mitigation measures will be identified by the Main Works Contractor(s) following their detailed assessments and incorporated in 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [Revision C], as per commitment NV05 in 7.2 Outline Code of Construction Practice [Revision F]. The assessment of construction dust concludes that with mitigation detailed in 7.2 Outline Code of Construction Practice [Revision F] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [Revision C] there would be no significant effects from dust nuisance on receptors within 250 m of the Order Limits. The 7.2 Outline Code of Construction Practice [Revision F] includes a commitment (GG26) that confirms construction lighting will be minimised, directional and of the lowest practicable intensity to reduce intrusion into nearby properties to ensure no significant effects.
James Abbot, Elizabeth Reynolds	Concerns about crackle Some IPs raised concerns about crackle associated with overhead lines, particularly in the damp weather.	Operational noise from the proposed overhead lines was scoped out of the ES on the basis that a low noise 'triple araucaria' conductor type is proposed. This is secured via commitment GG13 of 7.2 Outline Code of Construction Practice [Revision F]. This conductor produces low levels of noise, even during wet conditions. Although scoped out, additional information and assessment of operational noise from the proposed overhead lines is provided in 6.14.A5 Appendix 14.5 Operational Noise from Overhead Lines (Informative) [APP-261].

3. Applicant's Response to Specific Points Raised During the Oral Submissions

3.1 Applicant's Response to Specific Points Raised During the Oral Submissions

3.1.1 Table 3.1 sets out the Applicant's response to the specific points raised in the oral submissions.

Table 3.1 Applicant's Response to Specific Points Raised During the Oral Submissions

Organisation	Third party comment	Applicant's Response
James Cartledge (MP for South Suffolk)	National Grid has only ever seriously considered one option, pylons. The expert and independent assessment of all viable options for Norwich to Tilbury, known as the East Anglia study found that a fully undergrounded HVDC route was cheaper than pylons over the lifetime of the project and is technically feasible in the timescales that the capacity is needed.	The Applicant has responded to this in its response to Pylons East Anglia in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [Revision A] . The Applicant reiterates its position that the 'East Anglia Study' conclusions were drawn on a basis that did not take into consideration the legal and contractual duties and governance to which the Applicant must work. When these are appropriately applied, then the position is as set out by the Applicant and is a compelling case for a predominantly overhead line connection onshore.
Chris Whitfield	The proposed pylon alignment will have a profound effect on the historic core of Ardleigh, where there are listed buildings and the grade II* listed church of St Mary's, all protected within a designated conservation area. Under National Policy Statement (NPS) EN-1, the Applicant is required to minimise harm to the historic environment. In the Environmental Statement [APP-215], National Grid assesses the impact on St Mary's church as less than	The Applicant disagrees with the characterisation by the respondent which does not appear to consider the screening provided by buildings and vegetation. The matters raised in respect of the Grade II* Church of St Mary's and Ardleigh Conservation Area, including the contribution of setting and the level of harm identified, have previously been considered and addressed in 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] p. 187-188 and 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] p. 380-381, 388-389. As the Project will be screened by mature vegetation and buildings, the

Organisation	Third party comment	Applicant's Response
	substantial harm. By literally surrounding our village core with 50m pylons and cutting off the historic context of St Mary's church, in our view this would cause substantial harm.	Applicant is satisfied that the conclusions reached in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] , of minor adverse and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP 215] of lower less than substantial harm are appropriate. The Applicant therefore proposes to make no changes to the assessment as the conclusion is agreed by the statutory consultee Historic England 5.9.14 Draft Statement of Common Ground - Historic England [REP4-083] .
Chris Whitfield	National Grid has failed to prove that a less harmful alternative route is impossible. It has failed to provide a robust, transparent justification as to why the East Anglia connection node (EACN) cannot be located elsewhere.	The Applicant has explained, in the context of relevant policies and its duties, the justification for the location of the EACN. The preliminary location for the EACN substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Alternative locations include sites closer to the coast and sites further inland. This was after locations in the general vicinity of Felixstowe were considered but not taken forward. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The respondent may prefer an alternative location, but the Applicant remains clear that it has adopted a robust basis for selection. The Applicant has also responded to this point in its response to Pylons East Anglia Ltd on page 33 of 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139].

Organisation	Third party comment	Applicant's Response
Dick Lanham and Clare Lanham	The proposed access route comes through our main residential entrance. It raises privacy, security, peace of mind and has safeguarding concerns and also biosecurity risks. National Grid describes this access to the inspector as temporary and occasional, but our last heads of terms (HoT) say differently. We have identified and promoted an alternative access route, which would avoid our residential entrance and front garden. Permission has already been granted for that gateway to be used.	The Applicant has responded to the Lanham's in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [Revision A], which covers these points and other matters raised by the AP.
Andrew Buxton	Little Wenham Castle is a scheduled monument and is covered by the Ancient Monuments and Archaeological Areas Act 1979, which creates a legally binding schedule for any works that could damage or alter these sites. The NPPF states that the threshold for acceptable harm to a scheduled monument is exceptionally high. National Grid say in their assessment of harm that the project will be only partially visible due to distance and some vegetation. National Grid say in one context that the significant effects are identified within 1.5km of overground infrastructure in Suffolk, but in the context of Little Wenham it says that a distance of 1.2km is a long way.	The AP raised concerns in ISH2 regarding the approach to the assessment of Little Wenham Castle and the impact of the Project on this designated heritage asset, including consideration of alternatives. The Applicant responded regarding Little Wenham Castle (1033405/1003759) and the associated listed buildings in 8.4.12 Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points [REP5-194], page 142-143, and 8.8.1 Applicant's Comments on Written Representations [REP2-029] pages 76–77 and 222–224. In addition, Historic England responded to the Examining Authority at Deadline 5 stating with regard to Little Wenham Castle (NHLE 1003759, Scheduled, and NHLE 1033405, listed grade I), St Lawrence's Parish Church (NHLE 1033410, listed grade I) and Barn North of Castle (NHLE 1194552, listed grade II*). <i>'The Applicant acknowledges that views of the pylons may potentially be seen from the immediate vicinity of the grade II* listed barn but 'disagree with the assumption [made by Historic England] that intervisibility alone means the setting of the barn extends to the order limits.' They go on to note that 'the setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development.</i>

Organisation	Third party comment	Applicant's Response
		<i>Our [Historic England] assessment has not made that assumption, and we agree that the definition of setting of a heritage asset (as stated in the glossary to the National Planning Policy Framework) is 'the surroundings in which the asset is experienced.' We rather considered, based on viewpoint image 3.09 (Figure 7.12.F79_VP 3.09), that the agricultural landscape in which the grade II* listed barn is experienced would be affected by the proposed pylons. As this agricultural landscape is important to the understanding of the barn and its historic function as an agricultural building, we conclude that the proposed development would detract from this setting and would therefore cause harm to the significance of the barn.</i> <i>We [Historic England] do however remain of the view that this would be harm at a lower level of less than substantial harm.'</i>
Andrew Buxton	I have here an email from the Applicant dated 8 April, which says, ' <i>Under Ofgem's funding rules, we are required to use the lowest-cost option that is acceptable.</i> ' However, the project should not be driven purely by monetary price when there is a considerable community cost.	The respondent may have misunderstood the phrasing used here. Reference to 'that is acceptable' draws in other factors including effects on the community but within the parameters set out in the relevant National Policy Statements (EN-1, EN-3 and EN-5). The Applicant has considered many different factors as part of the options appraisal and design process. These include outcomes from the environmental surveys and impact assessment, feedback from consultation, technical feasibility and cost. This is set out in Section 3.3 of 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]. Paragraph 3.4.6 notes how the Applicant has had regards to its statutory duties under the Electricity Act 1989, including Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission, and Section 38 and Schedule 9 duties to preserve natural beauty and mitigate environmental effects.
Alexander Micklem	TB140 was 50m but the recent documents state that pylons will be 56.8m, so the impact will be even greater.	At DCO Submission, pylon TB140 was proposed as a low height structure with a design height of 42.3 m, see the Table of Parameters at the back of 2.3 Works Plans – Section F [APP-022] . The Applicant has since decided to accept Scenario 2.19, which would change this section from three low height pylons to two standard height pylons, as detailed in

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	According to National Grid's website, T-pylons are approximately 35m tall, which is significantly shorter than proposed here. Lattice pylons also require 1.5 times more concrete for their foundation and occupy approximately three times more land area than T-pylons. Why can't these be used?	table 2.19 of 8.11 Approach to Scenarios [REP5-212]. The design and subsequently the Section F Works Plans were updated at Deadline 5, where pylon TB140 is now a standard height lattice pylon with a design height of 54.7 m, see the Table of Parameters at the back of 2.3 Works Plans – Section F [REP5-019], revision B. The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics¹ confirms that whilst T-pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low-height lattice pylon design. T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used. Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice

¹ Institution of Engineering and Technology (2025) *Comparison of Electricity Transmission Technologies: Costs and Characteristics*

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		pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix A of 5.15 Design Development Report [APP-122]) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project.
Alexander Micklem	The AP had a meeting with the Applicant on 1 June 2026. The Applicant has responded on the 3 June 2026 to only two of the 11 action points raised in this meeting. Then Applicant is not actively engaging with APs. In the same response from the Applicant, it stated that the AP should expect to receive a section 172 notice, but this has not been received.	The Applicant remains committed to an ongoing dialogue with the AP in respect of Heads of Terms negotiations and the practical matters affecting the holding in parallel with this. There was a further meeting with the APs land agent on 4 June to further these discussions. The Applicant recognises that there are still some outstanding points that will be responded to once the relevant detail is available from the landowner commitments register process. As highlighted at CAH2, the Applicant conducts a process where requests for accommodation works and particular individual requests are received by Fisher German, inserted into a register and twice weekly meetings are conducted to triage, seek common themes across PILs and to identify the correct direction or decision from the technical specialists within National Grid. The Applicant will continue to review and respond to requests through this process. However, the focus at this time continues to be the matters that should be negotiated as part of HoTs rather than simply practical matters that would be dealt with through the usual agricultural liaison / pre-entry schedule of condition workstream at the commencement of main works. The Applicant can confirm that the s.172 notice referred to has now been issued.
Alexander Micklem	The Applicant states HoT were discussed at the meeting on 24 February 2026. This is incorrect as we were waiting for version 2 which were not released until 2 April.	The Applicant issued v1 of the HoTs in August 2025 and were in discussion with the APs agent from this point, with version 2 issued in April 2026. HoTs remain an ongoing negotiation with the AP and their agent with the latest meeting having taken place on 4 June 2026.

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Alexander Micklem	National Grid has also responded to my request for information regarding the alternative route by referring me to section 5.5 of the design development report, specifically paragraph 9.2.4. However, this section does not address the alternative route. It instead discusses high and low pylons and underground cables.	There may have been some misunderstanding over references here. The Applicant has checked and confirms that 5.15 Design Development Report [APP-122] sets out the Applicant's position on a more western route past Great and Little Waltham in the bullet points under paragraph 9.2.4, with a general indication of the alternative route shown in Figure 9.2. Alternative pylon heights are discussed from paragraph 9.2.5, noting the latest position has replaced the three low height pylons south of the river with standard pylons but retained the four low heights north of the River Chelmer in response to the heritage assessment.
Alexander Micklem	We have requested evidence to support National Grid's assertion that Historic England specifically requested the use of low-height pylons. The document provided by National Grid, merely shows Historic England agreeing with National Grid's proposal and does not demonstrate that Historic England directly requested low-height pylons.	The Applicant acknowledges the comment but is unclear which specific document is referred to. The process the Applicant undertook was to consider alternative designs where these were raised in consultation or due to the development of the assessment of the Project, as set out in 5.15 Design Development Report [APP-122] . In this location the proposal for low height pylons was discussed with Historic England to ascertain if they agreed with the Applicant's assessment that low height pylons would reduce the impact to Langleys Grade I listed building. As a consequence of this, and in recognition of the consideration this attracts in terms of policy, the Applicant considers that the four low height lattice pylons north of the River Chelmer is the appropriate design.
Alexander Micklem	I would like to see National Grid's desktop survey of the house, having looked online, very little information is there.	The assessment has been informed by the desk-based assessment set out in 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report [Revision B] , which draws on publicly available sources, including the National Heritage List for England and other relevant documentary and mapping evidence. The Applicant confirms that the baseline information has been compiled in accordance with standard archaeological and heritage practice and provides an appropriate evidence base to inform the assessment of effects.
Caroline Mason	The land around Ardleigh and Little Bromley is prime agricultural land, much of it is grade 1 and grade 2 (best and most versatile). This will be	The value of the agricultural land in this area, in terms of Agricultural Land Classification (ALC) grade is recognised by the Project. The assessment of land grade is presented in Environmental Statement

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	lost and cannot be restored simply by putting soil back. National policy states that significant adverse impacts should be avoided, not softened afterwards. The UK Food Security Report 2024 shows food production is already under pressure from extreme weather, climate volatility and import dependence. In that context, losing the best farmland is a national concern. The cumulative loss of soil with Five Estuaries, North Falls and Tarchon, is estimated at over 170 hectares, which is a disproportionate concentration of harm at Ardleigh and Little Bromley.	Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143] which shows the land around Ardleigh and Little Bromley, within the Order Limits, to comprise predominantly Grade 2 and Grade 3a, with a small area of Grade 1 land. The measures to protect the soil resources during construction and ensure the reinstatement of land back to its pre-construction condition are set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [REP5-145]. This outline plan will be updated prior to construction to ensure it accounts for the final design and construction programme. In relation to food security, several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] confirms the amount of agricultural land to be permanently impacted.
James Abbot	The Silver End sewer mains runs underneath our property and under the field next to our property, which the works will go over, including the haul road. A number of properties connect to that by a private sewer on the edge of the field. We do not know whether the works would affect the private sewer.	National Grid acknowledges the need to adhere to the relevant legislation, guidelines, codes of practice, and international standards for the Project. Necessary precautions have been and continue to be taken, and these are addressed comprehensively throughout the planning and execution phases of the Project. For further details on how the Applicant and its delivery partners account for existing buried pipelines in proximity to the works see ref no. 9-9.37 in 5.1 Consultation Report [APP-066] <i>“National Grid acknowledges the need to adhere to the relevant legislation, guidelines, codes of practice, and international standards for the Project. Necessary precautions have been taken, and these addressed comprehensively throughout the planning and execution phases of the Project. Specifically:</i>

Organisation	Third party comment	Applicant's Response
		• <i>HSE Guidance GS6 (Overhead Power Lines) and HSG47 (Underground Services): A thorough survey identifying and mapping all overhead power lines and underground services was undertaken. Safe working distances were maintained by the proposed design and will be strictly enforced during construction.</i> • <i>The Pipeline Safety Regulations 1996: We are aware of the requirement not to cause any damage to pipelines that could cause the release of dangerous fluids. Where we have not been able to mitigate potential damage by routeing, we will be looking to install other active mitigation measures. We have also contacted all relevant pipeline operators for information and are working with them to develop adequate mitigations for long term and temporary construction risks.</i> • <i>Management of Health and Safety Regulations 1999: National Grid operates a comprehensive health and safety management system, compliant with the 1999 regulations. This included detailed risk assessments, method statements, and ongoing monitoring of safety performance. All our contractors are expected to be appropriately trained and supplied with personal protective equipment.</i> • <i>British Standards BS EN 50122-1: We are working with Network Rail to ensure that the electrical design and installation of the Project will adhere to BS EN 50122-1, ensuring electrical safety, proper earthing, and a safe return circuit and mitigating any risk of induced voltages in their assets.</i> • <i>BS EN ISO 18086: Regarding BS EN ISO 18086, a detailed AC corrosion study is underway. There is the potential, based on induced currents from the 400 kV overhead line, that alternating current mitigation measures may need to be installed to pipeline. The scope and extent of such mitigation measures will be dependent on the final design arrangements of the Project which will continue to evolve within the parameters of confirmed Limits of Deviation. Consultation between National Grid and the relevant utility provider will confirm the</i>

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		<i>requirement for installed mitigation, based on the final 400kV design arrangements, which will be implemented by the relevant utility provider under their existing utility operation and maintenance provisions.</i> <i>We are confident that the Project has been and will continue to be executed with the highest regard for safety and in full compliance with all relevant regulations and standards.”</i> The Applicant and its delivery partners will continue to undertake the above activities, including ongoing engagement with affected utilities during the detailed design and construction of the Project.
James Abbot	Our property is a long-standing and active bat roost and the Applicant has not engaged with this.	The Project has no direct impacts to structures that could support bat roosts such as the property mentioned. The only effect that the Project could have on the bats using the known roost would be to a temporary impact to commuting or foraging routes used by the bats occupying the roost. The Applicant considers that through targeted survey work routes that are used by sensitive bat species have been identified. That suitable mitigation has been identified, and so commuting and foraging bats would not be affected by the Project, as reported in 6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036] and the mitigation is contained in 7.4 Outline Landscape and Ecological Management Plan Appendix E - Bat Flyway Locations [AS-048].
James Abbot	We are concerned about electromagnetic fields and how the Project will affect our astronomical observatory.	As detailed in 7.8 Electric and Magnetic Field Compliance Report, Section 6.2.9 [REP 3-034] the overhead line has been designed to ensure that the electric and magnetic fields (EMFs) reduce quickly with distance. The observatory appears to be located over 1km away and as demonstrated in Figures 6.1 and 6.2 of 7.8 Electric and Magnetic Field Compliance Report [REP 3-034] the EMFs will have reduced to a background level, so no appreciable increase in EMFs will be observed at the observatory. Additionally, the proposed overhead line is designed to National Grid's

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		technical specifications which include the requirements of BS 5049-3 (BSI, 1994), along with other equipment-specific standards such as BS EN 60437 (BSI, 1998) for the insulators on the pylons to limit radiofrequency emissions. All the equipment used will meet the requirements in these standards. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report [REP3-034] and would present no issues to optical telescopes.
James Abbot	Our only means of safe exercise is the public right of way, Rivenhall 11, which will be crossed by the haul road and pylons. Will we be able to go for walks? That corridor and the adjacent line of trees includes a 300 year old veteran oak tree on Park Road, will this tree survive?	PRoW Rivenhall 11 will have a temporary isolated closure and localised diversion where the PRoW intersects with the temporary construction haul road. During the periods of stringing the proposed conductors, temporary managed closure maybe required in line with the measures set out within the Section 3.1.3 of 7.6 Outline Public Rights of Way Management Plan Final Issue C [REP5-163], in order to safely protect any users of PROW 11. The Applicant is aware of the veteran oak tree, locally referred to as Henry. The tree is recorded as T820 within 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]. This veteran tree is retained through design and micro-siting of construction activities the veteran oak tree is retained. This is secured in 7.4 Outline Landscape and Ecological Management Plan Appendix B – Ancient Woodland and Veteran Tree Strategy [Revision C].
James Abbot	The route passes between the grade I listed Rivenhall church and the grade II* listed Rivenhall Park, which is an historic parkland setting.	The Applicant has assessed the Church of St Mary and All Saints (1169594) as having a permanent negligible adverse significance of effect (during the operation phase) (see page 1135-1136 in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement

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		Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). Historic England agrees with the Applicant's assessment of the Church of St Mary and All Saints [REP1-191]. The Applicant has assessed Rivenhall Place (1122598) as having a permanent minor adverse significance of effect (during the operation phase) (see page 1156-1157 in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The Applicant maintains the position set out in its previous submissions (8.4.13.1 Applicant's Response to Pylons East Anglia's Comments on its ExQ1 Responses [REP5-202], 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1 [REP4-300] and HE1.31 of 8.9.1 Applicant's Responses to First Written Questions [REP3-074]).
Northumbrian Water Limited (NWL)	NWL was only provided for the relevant land shapefiles in respect of the proposed changes known as CR1 and CR2 on 16 June 2026. Early searches indicate that CR1 affects additional NWL assets but investigations are ongoing. At present, there are no agreed protective provisions or side agreements between NWL and the Applicant. NWL is opposed about the cost-sharing arrangements proposed.	The Applicant has responded to this in its response to NWL in Section 2.2 in 8.5.10 Applicant's Written Summary of Oral Submissions and Response to Action Points for Compulsory Acquisition Hearing 3 [Revision A].
Elizabeth Reynolds	Under the current proposal, one pylon is expected to be approximately 80m from our bedroom window. The visual impact on our home and the surrounding countryside will be severe and permanent.	Document 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment Part 1 [REP5-126] to [REP5-135] (the RVAA) provides an assessment of the effects upon the visual amenity of residents at Handley Green Barn (RVAA code F4). Table A13.4.3 of the RVAA identified that the dwelling was located approximately 167 m from the nearest pylon (TB182) as proposed on the

Organisation	Third party comment	Applicant's Response
		'centreline of work' (shown on sheet 10 of 10 in document 2.3 Works Plans - Section F [APP-021]). Should pylon TB182 be positioned at the allowable closest point within the Limits of Deviation it would be located approximately 137 m from the property. The RVAA assessed both scenarios and found that whilst the Project would be clearly visible from at least one aspect of this property it would not, at this distance (and taking into consideration the filtering properties of existing vegetation) be the key defining feature of views experienced by residents when seen 'in the round'.
Elizabeth Reynolds	I am deeply concerned about flooding. During construction, our basement flooded daily until the structure became watertight. Even now, two permanent pumps operate continuously to manage groundwater. Ivy Barn Lane floods regularly due to its location within the valley. Has the impact of additional hardstanding, access routes, and construction works on local drainage has been properly assessed.	The Project has been subject to detailed assessments covering the potential to impact on flood risk from a range of sources, set out in 7.9 Flood Risk Assessment [APP-331] and to effect groundwater levels and flows (6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]). A range of measures and controls have been identified to avoid or mitigate effects, which are set out in 7.2 Outline Code of Construction Practice [REP5-139], and in an 8.2 Drainage Strategy DCO [REP4-186], which specifically describes the strategy that will be adopted for managing rainfall runoff from new areas of hard standing and the general construction swathe. The assessments have been conducted, engaging closely with the Environment Agency and Lead Local Flood Authorities. The Environment Agency has accepted the conclusions of the Flood Risk Assessment, as detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP5-102].
Elizabeth Reynolds	Traffic not considered properly	The assessment of traffic effects is presented in the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and its appendices. The environmental assessment has been undertaken in line with the recognised Institute of Environmental Management and Assessment Guidelines: Environmental Assessment of Traffic and Movement (2023). A 7.11 Transport Assessment [APP-333] has also been prepared, ensuring that the traffic assessment considered the

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		busiest periods of the day (AM and PM peak hours). A review of the existing traffic conditions for Ivy Barns Lane was conducted, including an assessment of the highway conditions and traffic surveys. Future traffic levels were estimated using standard methodology with the use of TEMPro growth factors and considering other developments that are already committed and could influence traffic patterns in the area. Based on the work presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333], no significant traffic effects are anticipated as a result of the Project on Ivy Barns Lane. Therefore, the Applicant has considered traffic appropriately as part of the assessment presented on the DCO application.
R D & J BurrIDGE	The route was changed in 2024. The current route proposal is high on a hill beside a valley. It was moved higher to the west and out of the valley to avoid a tiny grass paddock that is occasionally used for model planes, but has no facilities. It was moved with no consultation with surrounding parties that are now heavily impacted by the new route. The new route is more impactful in every way. It is closer to residential properties and a wedding business at Low Barn Farm.	The Applicant responded to the change of route in its response to Roydon Malcolm BurrIDGE on page 156 of 8.8.1 Applicant's Comments on Written Representations [REP2-029]. This stated that the Applicant responded to this request in 5.1 Consultation Report [APP-066] (10-22.46): <i>'National Grid notes the respondent's feedback. The suggested route would take the alignment across the edge of Hapton Common County Wildlife Site, would move the alignment closer to properties at Fundenhall and would also take the alignment closer to South Norfolk Model Flying Club reintroducing potential interactions. We are therefore not proposing a further change to the alignment between RG27 and RG35. We have positioned pylons as close to field boundaries as possible to reduce impacts to agricultural operations where technically feasible whilst ensuring constructability of the Project.'</i> The change was consulted on in the 2025 targeted consultations, which was held between 30 January 2025 and 3 March 2025.
R D & J BurrIDGE	We have proposed an alternative route that is shorter, lowers the height of five of the pylons	The Applicant responded to this request in 5.1 Consultation Report [APP-066] (10-22.46):

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	significantly, changes the background view from sky to land and trees, brings the bases of the pylons closer to field borders to allow corridors for wildlife to access them. It moves it significantly away and into the bottom of the valley, away from the wedding venue and residential properties at Low Barn Farm.	<i>'National Grid notes the respondent's feedback. The suggested route would take the alignment across the edge of Hapton Common County Wildlife Site, would move the alignment closer to properties at Fundenhall and would also take the alignment closer to South Norfolk Model Flying Club reintroducing potential interactions. We are therefore not proposing a further change to the alignment between RG27 and RG35. We have positioned pylons as close to field boundaries as possible to reduce impacts to agricultural operations where technically feasible whilst ensuring constructability of the Project.'</i>
Brumfelda History Group, Broomfield	The site is potentially a unique Romano-British temple site because it appears to continue from a prehistoric ritual site in roughly the same position. There appears to be a strong relationship between the temple and the wider context of the surrounding landscape. The Applicants response to written question HE 2.11 has left us feeling underwhelmed and un-reassured. The Applicant does not appear to understand the potential value of the site, which they classified as a relatively small asset, but that does not take account of the asset's potential relationship with its wider setting. The results of the trial trenching are not available, and the geophysical surveys have only recently become so. How has the Applicant taken into account EN-5 paragraph 2.10.1 about considering and addressing routing and avoidance if the Applicant doesn't know what is there.	The development of the design for the Project has taken into account all available sources of information, including the information provided by Brumfelda History Group and other Interested Parties regarding this archaeological site. The results of the previous archaeological investigation in this area were carefully checked to ensure that all known important archaeology was avoided. As noted geophysical survey of the areas within the Order Limits in proximity to this site was undertaken and the results of this reviewed to test if any further amendments to the design would be necessary. Following the geophysical survey noted in [REP1-343] the area of pylon base TB149 and the temporary haul road will be subject to archaeological trial trenching to test the results of the geophysical survey and to confirm if any archaeological remains associated with the temple site are at risk. If unexpected archaeological remains, associated or not with the temple, are identified they will be mitigated under the terms of a Detailed Written Scheme of Investigation approved by the Local Planning Archaeological Advisor. Mitigation could include preservation in situ or excavation depending on the significance of the archaeology. The assessment for the Project was a staged process, with the design updated as further information became available. The Applicant notes that this is a standard approach to EIA and is in accordance with NPS EN-5 paragraph 2.10.1 and NPS EN-1.

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		As the Project continues into detailed design the Applicant and its delivery partners will continue to engage with APs and will seek to microsite permanent assets and temporary works areas to reduce as far as practicable impacts on affected receptors.
Brumfelda History Group, Broomfield	Regarding the potential to avoid impacts through micro-siting of pylons, the Applicant says that there would be potential to move the pylon working areas and haul road within the LoD, but says that this would depend on balancing various considerations, such as engineering feasibility, ground conditions, and proportionality of costs. There is apparently only a small potential to move the working area for pylon TB149 laterally, and probably no flexibility at all longitudinally. Avoiding impact through micro-siting therefore appears to be very little to none at all. In one of our earlier written reps [REP1-215], we proposed a slight change of alignment of approximately 100m to the west. This would also have a slight, but beneficial effect on the setting of the listed building, just west of Partridge Green Farm.	With regards to the alternative alignment suggested and effect on the listed building the Applicant responded to REP1-215 within 8.8.1 Applicant's Comments on Written Representations [REP2-029] as per below: <i>"Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings. The closest pylon of the listed building 'Vault to the West of Partridge Green Farm' (1306289) will be TB146.</i> <i>During construction phase, this asset is assessed to experience a temporary minor adverse significance of effect, and during operation phase, a permanent minor adverse significance of effect (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]). For both phases, the asset is assessed to undergo a Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]).</i> <i>5.15 Design Development Report [APP-122] addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.</i> <i>Overall, The Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on designated assets, including changes to their setting."</i>

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		As the Project continues into detailed design the Applicant and its delivery partners will continue to engage with affected parties and will seek to microsite permanent assets and temporary works areas within the flexibility available to reduce as far as practicable impacts on affected receptors.
Brumfelda History Group, Broomfield	We are also confused about the potential need for a Faraday cage over the adjacent gas pipeline, which took the working area even closer to the asset than the pylon itself.	The Norwich to Tilbury DCO does not allow for the installation of Faraday Cages over gas pipelines. Protective works may be required to existing third party pipelines which will be conducted in collaboration with asset owners.
Stanfords for Gent Fairhead and Co Ltd	The AP owns the mineral rights over Monks Farm, Kelvedon, which is designated as a mineral safeguarding area by the mineral planning authority. Surveys show substantial mineral deposits lie within an area of about 55ha or 137 acres. Current plans show the line of the pylons and cables running through the land, which would result in sterilisation of mineral. The Applicant is currently in discussion with them as to seeing if it can be agreed with them to relocate the position of two pylons, so that the alignment still remains within the application boundaries but the realignment would mean that the loss of mineral will be minimal, assuming that excavation and haulage can continue beneath the span of wires between the pylons.	The Applicant has responded to this in 8.4.10 Applicant's Comments on Responses to ExQ1 [REP4-299] on page 307-8. Where mineral extraction proposals are brought forward in proximity to operational overhead lines, the assessment process would typically involve the provision of a line schedule illustrating the overhead line at its maximum sag and sway, taking account of conductor temperature and wind loading. From this worst-case position, a minimum vertical clearance of 5.3m would be required to be maintained between the conductors and plant, or excavation activity. A 30m clearance should be maintained from the furthest extent of pylon foundations to the start of any excavation, to allow for safe access and maintenance and to prevent undermining of pylon foundations. Works within the 30m clearance distance may be authorised by exception, subject to agreement with National Grid. The Applicant is advised of further delay to the conclusion of the minerals planning process with no firm date identified. In the case of Bradwell Quarry, due to the identified route conflict between Blackwater Aggregates proposed area of mineral extraction and the proposed development undertaken by the freeholder Parkers of Leicester, the Applicant is proposing to take forward a hybrid of the two scenarios previously presented in 8.11 Approach to Scenarios [Revision D]. The hybrid option would be a mid-point between Scenario A and Scenario B which seeks to achieve an oversail of the main void space without

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		substantive encroachment into the future mixed used development area as well as to reduce the extent of sterilisation. This is reflected in 8.11 Approach to Scenarios [Revision D] submitted at Deadline 6 and in the final version of 8.3.27 SoCG with Blackwater Aggregates [Revision C] being submitted at Deadline 7. The Applicant will continue to engage with all parties through detailed design to further refine and confirm this alignment.
Paul Lanham	The access route through the farm is right by our front door and through our buildings which house the 4000 turkeys. Our purchaser has informed us that if this proposed route is used, they will terminate our contract because of the threat of the bird flu.	The Applicant has responded to the Lanham's in 8.4.14 Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [Revision A] , which covers these points and other matters raised by the AP.
Paul Lanham	We have got a cattle meadow where the Applicant is going to dig 30 trench pits, which will obliterate the grazing, The Applicant has said it can provide either supplementary feed the cattle, which is impractical or to sell the cattle early. This isn't what we do.	The Applicant is seeking to agree voluntary access under licence to undertake intrusive survey works including a number of Archaeological Trial Trenches (ATT), for which they would make an advance compensation payment to recognise the potential loss to the AP due to the impact on the cattle grazing. It is standard practice on projects of this nature to mitigate the impact on grazing land through adopting supplementary feeding, establishing alternative grazing or to look at temporary de-stocking to facilitate the works required for the ATT. Any loss suffered by the AP that is evidence based and justifiable would be eligible for compensation under the Compensation Code. This matter was discussed with the APs agent at a meeting held on 11 May from which the Applicant awaits a response regarding further solutions that could be adopted to alleviate the APs concerns.
Paul Lanham	We're opposed to the new pylon and the oversail of the wires across our fishing lake, which will cause a cessation of fishery activity. We put forward a proposed alternative which would avoid any effect at all on our farm.	The Applicant responded to this orally during CAH2, see response to Mr Paul Lanham on page 20 of 8.5.6 Applicant's Written Summary of Oral Submission to Compulsory Acquisition Hearing 2 [REP4-301] . The Applicant's agent further confirmed in writing in a letter to the AP dated 18 June 2026 that with the constraints in this area the Applicant is unable

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		to avoid the fishing lake and therefore this may become unusable. In this eventuality this is a compensable claim in line with the Compensation Code. This letter was also copied to the AP's land agent.
Roxwell Flood Prevention Group	The Applicant's proposal does not adequately assess the flood risk for temporary access routes and enabling works. The interaction between the Newland Brook and Roxwell Brook where it joins the River Cam has not been adequately considered. There are cumulative impact of extraction plans, floodplain disruption during temporary construction, emergency access into Roxwell. The AP raises concerns about modelling based on incomplete baseline data and methodologies and notes that downstream impacts have also not been considered. Temporary works are not in an empty field but an active floodplain. Seen no evidence to show how flood risk has been assessed.	Flood risk to construction access routes and work sites, including compounds is assessed in 7.9 Flood Risk Assessment [APP-331]. The assessment of risk from the River Cam and its tributaries has been informed by data provided by the Environment Agency and where risks of flooding have been identified, a range of measures and controls have been secured, as described in the 7.2 Outline Code of Construction Practice [Revision F]. In addition, 7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [REP5-147], which will be updated to a full plan by appointed Contractor, to identify routes of access and egress from construction sites in the event of flooding. The Environment Agency has accepted the conclusions of the FRA, as detailed in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP5-102].

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