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Norwich to Tilbury

Volume 5: Reports and Statements

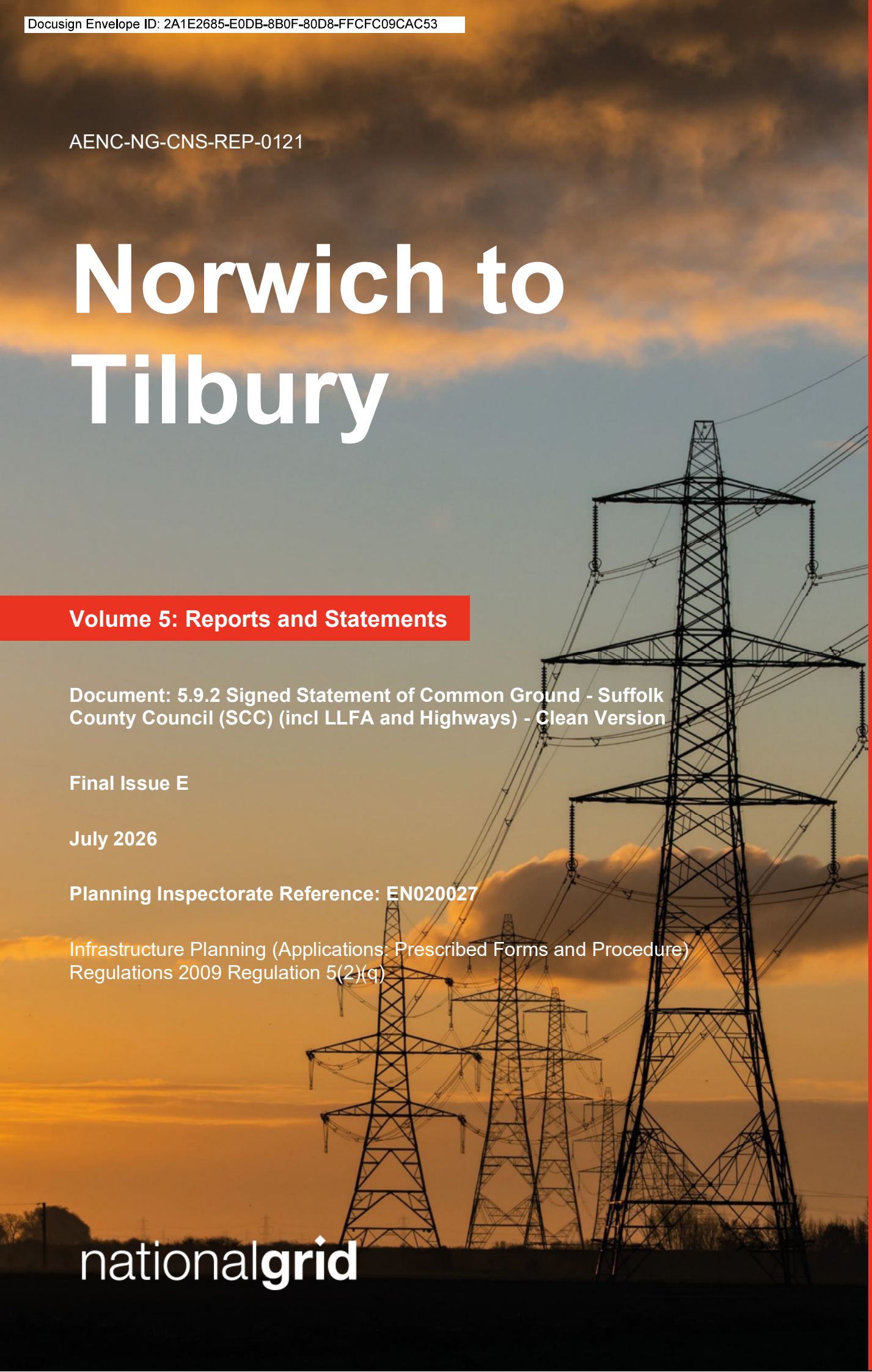
Document: 5.9.2 Signed Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) - Clean Version

Final Issue E

July 2026

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nationalgrid

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Version	Date	Submitted at
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B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
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1. Introduction

1.1 Overview

1.1.1 This final Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as the Applicant within this document) and Suffolk County Council (SCC). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to SCC. The applicable matters considered within this SoCG apply to SCC's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):

- Project development, description, and design
- Ecology and Biodiversity
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing (including Air Quality and Noise and Vibration)
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- Cumulative Effects
- Development Consent Order
- Other Matters

1.2 Summary of matters under discussion

1.2.1 As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

SoCG ID	Summary of matter under discussion	Deadline for resolution
Project development, description and design		
3.2.13 – Legal agreements	The Applicant will secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.	Discussions will conclude after finalisation of this SoCG through wording of the requirements.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
3.2.14 – Compensation / offsetting	National Grid is proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests.	Discussions will conclude after finalisation of this SoCG through the draft DCO wording.
Historic Environment		
3.6.19 – Outline CoCP	SCC suggests that the oLEMP contains a Historic Environment Management Plan based upon the results of the completed archaeological evaluation. The Applicant considers the oCoCP includes all relevant construction mitigation measures and is appropriate for managing construction impacts from the Project.	Resolution likely by Deadline 7.
3.6.19b – Maintenance control	SCC consider preservation in situ needs a mechanism to record locations so maintenance activities do not cause accidental damage to archaeology. The updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** submitted at Deadline 7 includes for such protections during the operation phase.	Discussions will conclude after finalisation of this SoCG.
3.6.22 – Outline Archaeological Mitigation Strategy and Outline WSI	SCC has reviewed the submitted AMS-OWSI and find that it does not establish sufficiently rigorous measures to secure a programme of archaeological evaluation and mitigation in the interests of the historic environment. The Applicant is submitting an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C] at Deadline 7.	Discussions will conclude after finalisation of this SoCG.
Landscape and Visual		
Traffic and Transport		
3.10.2 – Study area	SCC queried the scope of road network for traffic analysis and study area. The Applicant will continue to liaise with SCC in relation to this matter.	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
3.10.3 – Data sources 3.10.6 – Baseline conditions and receptors.	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC in relation to this matter.	Matter is unlikely to be agreed during Examination.
3.10.4 – Transport assessment methodology	SCC raised concerns relating to inter-project and cumulative effects of AIL movements. The Applicant will continue to liaise with SCC in relation to this matter.	Matter is unlikely to be agreed during Examination.
3.10.4a – AIL operation stage impacts	SCC concerns relating to AIL operational movements. The Applicant will continue to liaise with SCC in relation to this matter.	Matter is unlikely to be agreed during Examination.
3.10.13 – Construction effects - WCH	SCC raised queries on mitigation for WCH on PARs. The Applicant will continue to liaise with SCC in relation to this matter.	Matter is unlikely to be agreed during Examination.
Transport Assessment (TA)		
3.10.18 – Junction capacity assessment methodology 3.10.19 – Junction modelling 3.10.23 – Mitigation measures	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC in relation to these matters.	Matter is unlikely to be agreed during Examination.
3.10.27 – Baseline conditions 3.10.28 – Growth factors	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC in relation to these matters.	Matter is unlikely to be agreed during Examination.
3.10.31 – Junction capacity – A140 / A143 roundabout 3.10.32 – Junction capacity – A1214 / A14 Copdock Interchange	SCC raised queries on A140 / 143 roundabout and A1214 / A14 roundabout at Copdock. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.33 – Inter-project cumulative effects – A140	SCC raised concerns that pre-existing issues along A140 route could be exacerbated. The Applicant undertaken further modelling and did not identify significant capacity issues at Site 35 A140 Stoke Ash Junction. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.34 – Inter-project cumulative effects – delay	SCC raised concern about increased delay and reduced residual capacity on the A140, A143, A1214 and A1120. The Applicant has assessed these and did not identify significant effects on the sensitivity	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	of the road links raised. The Applicant will continue to liaise with SCC on this matter.	
3.10.35 – Inter-project cumulative effects – sustainable transport and severance	SCC raised concern about impacts on cycling (and other sustainable transport) and severance in communities along the A140 and A143. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.36 – Inter-project cumulative effects – local traffic on minor roads	SCC raised concerns that local traffic will swich to minor, less suitable roads due to construction traffic impacts. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.37 to 3.10.40 – Junction modelling for PAR 10, PAR 16, PAR 17 and PAR 22.	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC on these matters.	Matter is unlikely to be agreed during Examination.
3.10.41 – Key assumptions – core working hours	SCC objects to HGV deliveries being made over the weekend. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.45 – Construction workforce trips	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC on these matters.	Matter is unlikely to be agreed during Examination.
3.10.49 – Pre- and post condition surveys	SCC requested Re-inspection of AIL routes prior to use. The Applicant is in agreement with SCC.	Matter is unlikely to be agreed during Examination.
3.10.51 – Implementation / Enforcement	SCC is reviewing the information provided. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.52 – Monitoring and mitigation	SCC request for monitoring, mitigation and compensation for extenuating, unforeseen circumstances. The Applicant will continue to liaise with SCC on this matter	Matter is unlikely to be agreed during Examination.
3.10.65 – Diversion routes	SCC are seeking to agree diversion routes and has raised concerns on Wickham Lane in particular. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.68 – Network management	SCC raised concerns on the construction impacts to road network management and sought clarification on restrictions to HGV movements applying to two-way movements. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
3.10.73 – AIL permanent route resilience	SCC has sought further discussion of permanent improvements to highway structures and the resilience of routes. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
3.10.74 – Legal Agreement	The Applicant is negotiating with SCC a Framework Highways Agreement/Protective Provisions.	Matter is unlikely to be agreed during Examination.
Public Rights of Way (PRoW)		
3.11.6 – Construction impacts on PRoW	SCC request for further assessment of construction impacts on Public Rights of Way. The Applicant will continue to liaise with SCC on this matter.	Matter is unlikely to be agreed during Examination.
Cumulative effects		
3.12.10 – Construction effects	SCC has major concerns regarding the conclusions of the cumulative impact assessment. The Applicant considers the assessment of effects during construction presented is considered appropriate. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety.	Discussions will conclude after finalisation of this SoCG
Development Consent Order		
3.13.5 – Archaeology requirement wording 3.13.6 – Archaeology requirement wording 3.13.7 – Archaeology requirement wording 3.13.8 – Archaeology requirement wording	SCC acknowledges that the amendments to the requirement wording are satisfactory but considers that all parts of the requirement must work together and that the matter should remain under discussion until the requirement wording is agreed. The Applicant will continue to engage with SCC in respect of the proposed archaeological requirement wording.	Discussions will conclude after finalisation of this SoCG through the archaeological requirement wording.
3.13.9 – Archaeology requirement provisions	SCC acknowledges that additional provisions for post-excavation analysis, publication, and archiving to secure these stages have been added to the Draft DCO but maintains that there are significant outstanding concerns with the proposed requirement wording. The Applicant will continue to engage with SCC in respect of the proposed archaeological requirement wording. .	Discussions will conclude after finalisation of this SoCG through the archaeological requirement wording.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
3.13.13 – Employment and skills plan	SCC supports the proposed mitigation but seeks stronger commitments, including clear targets and monitoring to maximise local employment and skills benefits. The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this plan has been secured by Requirement 15. However, whether approval of the submitted plan should also be secured within the wording of the Requirement remains under discussion.	Discussions will conclude after finalisation of this SoCG through the requirement wording. .
3.13.14 – Applications made under requirements	SCC considers the proposed decision-making timescales for discharge of requirements to be too short and seeks a longer period (56 days). The Applicant has revised the proposed period to 25 business days (equivalent to 35 days) and considers this proportionate and necessary to avoid project delays. The Applicant notes that this period can be extended by agreement in writing where required.	Matter unlikely to be agreed. Discussions will conclude after finalisation of this SoCG
3.13.15 – Further information	SCC considers the proposed timeframe for requesting further information insufficient and seeks a longer period (21 days). The Applicant has amended the Draft DCO to refer to “five business days” for consistency of terminology and considers five business days to be proportionate given the Project’s status of critical national importance. The Applicant notes that requests for further information can still be made after the five business day period with agreement where necessary.	Matter unlikely to be agreed. Discussions will conclude after finalisation of this SoCG
3.13.176 – Fees	SCC considers the proposed approach for the fees payable for applications under Requirements inadequate, and seeks fees to apply to both requirements and articles, full cost recovery, and removal of refund provisions. The Applicant has amended the Draft DCO to align fees with the national schedule for discharge of conditions. The Applicant proposes the use of post-consent PPAs	Discussions will conclude after finalisation of this SoCG.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	to address cost recovery but considers a signed PPA as a pre-condition to discharging requirements to be disproportionate. The Applicant will consider revised DCO drafting to allow authorities to retain an invalid application fee and credit it against a subsequent valid application.	
Appendix A – DCO Wording	Discussions are ongoing in relation to detailed drafting points on: • Definition of 'maintain'; • Pre-commencement operations; • Development consent etc. granted by the Order • Planning permission • Street works without the consent of the street authority • Application of the 1991 Act; • Removal of human remains; • Traffic regulation; • Felling or lopping; and • Draft protective provisions (Highways)	Discussions will conclude after finalisation of this SoCG

1.3 Project Description

1.3.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
  - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1)
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables

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- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

1.3.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.3.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.3.4 The Project will be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with SCC
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

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2. Record of Key Engagement

2.1 Introduction

2.1.1 National Grid has engaged with SCC on the Project throughout the pre-application process. This has included:

- Non-statutory consultation in Spring 2022 and Summer 2023
- Statutory consultation in Spring 2024
- Targeted consultations in Spring 2025
- Regular meetings with lead officers about the Project as a whole
- Regular 'Thematic Group' meetings bringing together host authorities to discuss specific topics
- One to one / small group technical meetings on specific detailed matters
- Sharing of papers and documentation at key stages

2.1.2 Further details on National Grid's engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

2.2 Summary of Key Engagement

2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between National Grid and SCC.

Table 2.1 Summary of Key Engagement between National Grid and SCC

Date	Format	Topic/Description
General		
May 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
October 2022	Site visit	T-pylon site visit with case officers.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.
March 2023	Meeting	All host authority workshop.

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Date	Format	Topic/Description
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
November 2023	Meeting	All host authority workshop.
December 2023	Meeting	Discussions regarding the Waveney Valley and the Waveney Valley Alternative.
December 2023	Email Correspondence	National Grid issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
February 2024	Meeting	Connection agreement discussion.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
April 2024	Meeting	DCO discussion with SCC and Babergh and Mid Suffolk District Council's (BMSDC).
May 2024	Meeting	All host authority workshop.
June 2024	Meeting	DCO discussion with SCC and BMSDC.
September 2024	Email Correspondence	National Grid issued the draft Outline CoCP to all host authorities for comment.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	National Grid issued the second iteration of the Outline CoCP
November 2024	Meeting	Meeting to discuss approach to targeted consultation
November 2024	Meeting	All host authority workshop
January 2025	Meeting	Meeting to provide project and design update
January 2025	Meeting	All host authority workshop

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Date	Format	Topic/Description
January 2025	Meeting	National Grid hosted a meeting to discuss comments on the second iteration of the Outline LEMP and Outline CoCP
January 2025	Email Correspondence	National Grid issued the draft SoCG
March 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid shared an updated Outline CoCP
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline CoCP - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email Correspondence	National Grid issued the Long List of Other Developments
May 2025	Meeting	Meeting to discuss duty to further the purposes of the National Landscape
May 2025	Meeting	All host authority workshop
May 2025	Technical Note	National Grid shared the long list of other developments
June 2025	Email Correspondence	National Grid issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	National Grid issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	Meeting to agree deadline 4 Statement of Common Ground approach
March 2026	Meeting	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.

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Date	Format	Topic/Description
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
July 2026	Meeting	Meeting to discuss and provide comments regarding how offsite BNG and tree planting is to be secured
Ecology and Biodiversity		
July 2022	Email Correspondence	National Grid shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - National Grid presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from SCC and other authorities.
September 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
September 2023	Email Correspondence	National Grid shared the draft Order Limits shapefile with SCC.
October 2023	Email Correspondence	National Grid shared the shapefiles of the corridor dated 06/07/23.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	National Grid issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
September 2024	Email Correspondence	National Grid shared the Outline LEMP
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and Outline CoCP.
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline LEMP
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities on Proposed Protected Species Mitigation Measures

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Date	Format	Topic/Description
January 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on the draft Biodiversity Net Gain Report
April 2025	Email Correspondence	National Grid issued the draft Arboricultural Impact Assessment (AIA)
April 2025	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on the second iteration of the proposed mitigation for species outside the remit of Natural England.
May 2025	Email Correspondence	National Grid shared an updated Outline LEMP
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline LEMP – Appendix D, Outline Landscape Proposals
May 2025	Meeting	National Grid hosted a meeting to discuss the updated Proposed Protected Species Mitigation.
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
January 2026	Meeting	National Grid hosted a meeting with Essex Place Services to discuss the Statement of Common Ground.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground.
Contaminated Land, Geology and Hydrogeology		
August 2022	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	National Grid issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).
Health and Wellbeing (including Air Quality and Noise and Vibration)		
September 2022	Email Correspondence	National Grid issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality assessment for review and comment.

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Date	Format	Topic/Description
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2023	Technical Note	National Grid issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2023	Email Correspondence	SCC requested that mental health during the Project's operation is considered within the Health and Wellbeing assessment.
September 2024	Meeting	National Grid held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	National Grid issued a refreshed Health and Wellbeing technical note on the proposed approach to the EIA, including guidance, study area, scope, and assessment methodology.
December 2024	Meeting	National Grid held an additional meeting for those unable to attend the September meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the health and wellbeing section of the Environmental Statement
April 2026	Meeting	Meeting to discuss the Statement of Common Ground.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground.
Historic Environment		
July 2022	Email Correspondence	National Grid issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	National Grid presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.

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Date	Format	Topic/Description
January 2023	Email Correspondence	National Grid issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	National Grid held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	National Grid issued a technical note to Historic England and host authorities (including Suffolk County Council) to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	National Grid shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Email Correspondence	National Grid responded to cultural heritage viewpoint feedback from stakeholders.
March 2024	Technical Note	National Grid shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Technical Note	National Grid shared the updated Written Scheme of Investigation (WSI) for Geophysical Surveys with the Archaeology Working Group Members.
March 2024	Email Correspondence	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.

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Date	Format	Topic/Description
May 2024	Technical Note	National Grid shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	National Grid shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Suffolk County Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	National Grid shared the Setting survey locations with stakeholders.
October 2024	Email Correspondence	National Grid shared Site Specific WSI for Trial Trenching, Site 008, 'Underground Cable between Coopers Corner and River Stour'
December 2024	Meeting	Archaeology Working Group Meeting
December 2024	Email Correspondence	National Grid re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Meeting	National Grid held a meeting to discuss the Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting

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Date	Format	Topic/Description
April 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issues the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Technical Note	National Grid shared additional trench plans for Site 008, Area 22, north of the River Stour.
July 2025	Meeting	Archaeology Working Group Meeting
July 2025	Technical Note	National Grid shared the combined SSWSI for Sites 005, 006 and 007 and associated trench plans.
August 2025	Meeting	Archaeology Working Group Meeting
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	National Grid shared Priority Geophys Prelim Grayscales with stakeholders for consideration
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	A second follow up optional thematic group meeting to discuss feedback on the heritage section of the Environmental Statement
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	National Grid shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Technical Note	National Grid shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with Essex Place Services.
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground

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Date	Format	Topic/Description
January 2026	Meeting	Follow up meeting to discuss the heritage aspects of the Statement of Common Ground with Essex Place Services and Babergh and Mid Suffolk District Council.
February 2026	Email Correspondence	National Grid shared the Supplementary Environmental Information submitted to Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group
March 2026	Meeting	Archaeology Working Group
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
June 2026	Meeting	Meeting to discuss the mitigation proposed in the AMS and OWSI in Suffolk.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
June 2026	Meeting	Archaeology Working Group Meeting.
July 2026	Meeting	Archaeology Working Group Meeting.
July 2026	Email	Updated draft of Geoarchaeological monitoring of GI WSI Shared.
Hydrology, Land Drainage and Flood Risk		
June 2022	Email Correspondence	National Grid circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	National Grid presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.
May 2023	Technical Note	National Grid issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.

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Date	Format	Topic/Description
September 2024	Technical Note	National Grid issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	National Grid held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	National Grid issued the Draft Flood Risk Assessment (FRA) for agreement/comment
January 2025	Meeting	National Grid hosted a meeting to discuss comments received on the Draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	National Grid issued the Draft Flood Risk Assessment (FRA) for agreement/comment
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the hydrology and land drainage section of the Environmental Statement
November 2025	Meeting	Meeting to discuss the Hydrology and Drainage Section of the Statement of Common Ground.
April 2026	Meeting	Meeting to discuss the Hydrology and Drainage Section of the Statement of Common Ground.
June 2026	Meeting	Meeting to discuss the Hydrology and Drainage Section of the Statement of Common Ground.
Landscape and Visual		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. National Grid shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	National Grid issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	National Grid held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Suffolk. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES. Suffolk County Council provided feedback on the viewpoints at the meeting and in subsequent correspondence.

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Date	Format	Topic/Description
April 2023	Meeting	National Grid held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	National Grid presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders (including SCC) provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	National Grid shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	National Grid issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	National Grid shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	National Grid responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
July 2024	Meeting	National Grid held an optional briefing regarding statutory consultation for those from Suffolk County Council and Essex Place Services who could not join the Optional Statutory Consultation Thematic Group call in May 2024.
September 2024	Email Correspondence	National Grid shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	National Grid held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.
September 2024	Email Correspondence	National Grid shared the shapefiles for the landscape viewpoints and order limits with SCC and other stakeholders following the Landscape Thematic Group Meeting.

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Date	Format	Topic/Description
September 2024	Email Correspondence	National Grid shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
September 2024	Meeting	Landscape Thematic Group Meeting to discuss viewpoints – Suffolk.
October 2024	Meeting	Focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	National Grid shared the Draft mitigation drawings with stakeholders
October 2024	Email Correspondence	National Grid shared the National landscape setting study with stakeholders
October 2024	Email Correspondence	National Grid shared updated viewpoint information data following from the landscape thematic workshops
November 2024	Meeting	National Grid meeting to agree LVIA methodology and viewpoint photography locations and photomontages to be used for the ES
March 2025	Email Correspondence	National Grid issued an update on LVIA Viewpoints and Methodology
October 2025	Meeting	National Grid hosted an optional thematic meeting on landscape compensation, adequacy of LVIA, landscape assessment sensitivity and landscape character types.
October 2025	Meeting	A second optional thematic group meeting to discuss feedback on the landscape section of the Environmental Statement.
January 2026	Meeting	Meeting to discuss the Landscape and Visual Section of the Statement of Common Ground.
March 2026	Email Correspondence	National Grid sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in SCC's Local Impact Report
April 2026	Meeting	Meeting including Babergh District Council to discuss and understand additional measures requested at Bramford and justification
May 2026	Meeting	Further meeting including Babergh District Council to discuss and review additional material received on measures requested at Bramford and justification
May 2026	Meeting	Meeting with SCC including Norfolk County Council (NCC) to discuss and understand additional

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Date	Format	Topic/Description
		measures requested at Waveney Valley and justification
June 2026	Meeting	Joint meeting with BMSDC to discuss the Statement of Common Ground
June 2026	Meeting	Meeting with SCC including NCC to discuss location specific landscape compensation measures at Waveney Valley, Gipping Valley and Bramford
June 2026	Meeting	Joint meeting with BMSDC to discuss the Statement of Common Ground
July 2026	Meeting	Meeting with SCC including NCC to discuss location specific landscape compensation measures at Waveney Valley, Gipping Valley and Bramford
July 2026	Meeting	Meeting to discuss the Statement of Common Ground
Socio-economics, Recreation and Tourism		
July 2022	Email Correspondence	National Grid issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including SCC.
June 2023	Technical Note	National Grid issued a Technical Note setting out the study area and methodology for assessing businesses where visual impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	National Grid held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	National Grid shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.

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Date	Format	Topic/Description
November 2024	Meeting	National Grid held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Technical Note	National Grid issued the third Technical Note for Socio-economics, Recreation and Tourism
September 2025	Meeting	National Grid held an optional thematic group meeting to discuss the level of impact on businesses and lack of upskilling for local people.
March 2025	Email	The Applicant shared a 3rd Technical note to agree the study area and assessment criteria for comment.
June 2026	Meeting	Meeting to discuss the Statement of Common Ground
Traffic and Transport		
June 2022	Technical Note	National Grid issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	National Grid held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting
December 2022	Meeting	National Grid held a Transport Working Group to discuss the assessment of routes for construction traffic.
August 2023	Meeting	National Grid held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	National Grid held a stakeholder meeting with SCC setting out details of the proposed alignment, haul roads, PARS, MRN and SRNs affected and proposed construction vehicles including for Bramford substation and cable sealing compounds.
September 2023	Meeting	National Grid held a Transport Working Group Regional Meeting.

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Date	Format	Topic/Description
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities (including SCC).
November 2023	Meeting	National Grid held a PRoW Thematic Group Meeting.
January 2024	Meeting	National Grid discussed the Draft Outline Construction Traffic Management Plan (CTMP) at the Transport Working Group.
March 2024	Technical Note	PAR routes sent to LHAs
March 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	National Grid held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highways authorities (including Suffolk County Council).
June 2024	Meeting	National Grid held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management.
July 2024	Report	Receipt by National Grid of statutory consultation response from SCC.
July 2024	Email Correspondence	Proposed Abnormal Indivisible Load (AIL) Routes issued for comment.
July 2024	Meeting	National Grid held a Transport Working Group Meeting with SCC to discuss statutory consultation comments and PAR highway mitigation including merge taper on the A12 within National Highways jurisdiction.
August 2024	Meeting	National Grid held a Transport Working Group Regional Meeting with all LHAs present. Highway mitigation including TTROs and TROs to be presented in schedules, PRoW surveys to be arranged by PRoW officers and RSAs for crossover bellmouths to be sent to LHAs for review.
September 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of TA was presented National Grid provided

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Date	Format	Topic/Description
		an overview of the initial capacity assessment methodology using.
October 2024	Meeting	National Grid held a Transport Working Group Regional Meeting with all LHAs present. Updated AIL route packs sent out, re-cap of multi modal study given.
October 2024	Email Correspondence	National Grid requested for structural feedback for a potential AIL route.
October 2024	Email Correspondence	SCC feedback received for a potential AIL route.
November 2024	Meeting	National Grid held a LHA Engagement Meeting to discuss potential changes following statutory consultation, visibility splays and traffic management methodology, access for existing utilities and AILs.
January 2025	Meeting	National Grid held a Transport Working Group Meeting. Presented work in progress draft of Transport Assessment. Ran through methodology of junction sifting process, junction assessment methodology and cumulative assessment.
January 2025	Meeting	National Grid presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised.
January 2025	Meeting	National Grid held a Suffolk Traffic and Transport Working Group meeting. UK Power Networks accesses and need for additional RSAs discussed, highway mitigation developments made, PRoW mitigation strategy to be shared, IEMA mitigation, SOCGs and transport assessment discussed.
January 2025	Email Correspondence	National Grid requested structural record information for a structure along a potential AIL route.
January 2025	Email Correspondence	SCC shared structural record information for a structure along a potential AIL route.
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy
February 2025	Email Correspondence	National Grid issued AIL Structures Register for SCC review and feedback.
February 2025	Meeting	National Grid Traffic and Transport Working Group Regional Meeting, all LHAs present. TTROs

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Date	Format	Topic/Description
		and PRoW closures to be captured in schedules, updates on trip generation give, various meetings to be arranged including for AILS, TROs and TTROs, and ES and TA.
March 2025	Meeting	National Grid presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised.
March 2025	Email Correspondence	SCC structural feedback for proposed AIL routes received (AIL structures register issued to SCC in Feb 2025 returned with comments).
April 2025	Meeting	National Grid held a SCC Highway Mitigation Workshop. Highway mitigation proposals at 5no. locations were discussed. RSA briefs sent in February to be reviewed by SCC.
April 2025	Meeting	National Grid held a Regional Stakeholder Meeting with SCC. AIL process, routes and agreement on approach sought ahead of DCO.
April 2025	Email Correspondence	National Grid issued updated information pack for proposed AIL routes.
April 2025	Email Correspondence	National Grid requested structural record information for structures along proposed AIL routes.
April 2025	Email Correspondence	SCC structural record information received.
April 2025	Meeting	National Grid attended a meeting with Suffolk County Council on priority-controlled junctions and traffic modelling. Discussed the results from LRN junction modelling and potential mitigation measures.
May 2025	Meeting	National Grid held a meeting to discuss the LRN junction modelling results in Suffolk for Norwich to Tilbury.
May 2025	Meeting	National Grid held a Regional Stakeholder Meeting with SCC. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
July 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.

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Date	Format	Topic/Description
July 2025	Email Correspondence	National Grid issued an Approval in Principle (AIP) for SCC review and sign-off for assessment of a structure along a proposed AIL route.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
September 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.
September 2025	Email Correspondence	National Grid issued an AIP for SCC review and sign-off for assessment of a structure along a proposed AIL route.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Suffolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
October 2025	Email Correspondence	National Grid issued an AIP for SCC review and sign-off for assessment of a structure along a proposed AIL route.
November 2025	Meeting	Optional thematic group meeting to discuss feedback on the traffic, transport and PrOW section of the Environmental Statement
November 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Suffolk County Council.
November 2025	Email Correspondence	Comments updating Suffolk County Council's position on the Statement of Common Ground were provided by SCC.
January 2026	Meeting	National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.
January 2026	Email Correspondence	National Grid issued letter to SCC outlining proposed approach for structural assessments and AIP preparation.
February 2026	Email Correspondence	SCC structural feedback received for a structure along a proposed AIL route in response to request from National Grid.
February 2026	Email Correspondence	Final comments on the Statement of Common Ground before Deadline 1 were provided by Suffolk County Council.

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Date	Format	Topic/Description
February 2026	Meeting	National Grid held a meeting with Suffolk County Council
May 2026	Meeting	National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.
June 2026	Meeting	National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.
June 2026	Meeting	National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.
July 2026	Meeting	National Grid held a meeting with Suffolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.

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3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

3.1.1 This chapter details the matters relevant to SCC which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.

3.1.2 The red, amber, green status shows the level of agreement with SCC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process, including detailed design.

3.1.4 Table 3.2 to Table 3.12 provides the matters agreed, not agreed or under discussion in relation to the various topics.

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3.2 Project development, description, and design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in relation to project development, description and design matters

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Strategic options/needs case				
3.2.1	Needs case	Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia. Norwich to Tilbury is listed as a key project in **Appendix 2** of the **NESO Clean Power 2030 Report.** For The Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**	SCC Response to Statutory Consultation (29/07/2024): In accordance with the Council's Energy and Climate Adaptive Infrastructure Policy, SCC recognise the importance of the Norwich to Tilbury proposals as part of the required infrastructure to connect low carbon energy generation developments that will deliver energy security and contribute to UK government targets.	Agreed
3.2.2	Project timing	Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. National Grid is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed	For SCC's position on project timing, please refer to Table Item 5.1 of **Suffolk County Council's Post-Hearing Submission for Issue Specific Hearing 1 [REP1-177].**	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		in contracts with energy generators (or customers) by NESO. **Appendix 2** of the **NESO Clean Power 2030 Report** shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion. For The Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.2.3	Onshore route	An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives. For The Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore Alternatives' in **8.8.2 Applicant's**	SCC considers that credible alternatives such as those outlined in the NESO's East Anglia Network Study (**Appendix 2 of the Suffolk Joint Local Impact Report [REP1-178]**). The Council notes, in particular, Option 8 within the East Anglia Network Study which sets out the option of replacing the onshore network configuration with an equivalent undergrounded High Voltage Direct Current route, together with other components, including Sea Link.	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Comments on Local Impact Reports [REP2-030]. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. Updated Strategic Options and Backcheck Review documents published at each consultation compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives. The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills. For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables'	SCC considers that credible alternatives such as those outlined in the NESO's East Anglia Network Study (**Appendix 2 of the Suffolk Joint Local Impact Report [REP1-178]**). The Council notes, in particular, Option 8 within the East Anglia Network Study which sets out the option of replacing the onshore network configuration with an equivalent undergrounded High Voltage Direct Current route, together with other components, including Sea Link.	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
Project development process - Design				
3.2.5	Waveney Valley	At statutory consultation in 2024, National Grid presented proposals for an overhead line across the Waveney Valley, along with an underground cable alternative for community and stakeholder feedback. After considering feedback, and the findings of our ground investigation (GI) and environmental surveys, the decision was made to proceed with an overhead line in this area. This decision considered a range of factors, including potential environmental impacts, planning policy, cost to consumers and alternate installation techniques for underground cables in response to GI surveys and the Waveney and Little Ouse Recovery (WaLOR) project. Mitigation, including landscape enhancement, has been discussed in relevant thematic group meetings with National Grid's EIA team and SCC's topic specialists. For the Applicant's position on the Waveney Valley, please refer to Section 3.5 'Alternatives – Waveney Valley' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** and **8.4.15 Applicant's Comments on Responses to ExQ2** in GEN 2.2 **[REP6-115].**	SCC's position on the Waveney Valley can be found in **Annex A of the Suffolk Joint Local Impact Report [REP1-178].** SCC's position has been further elaborated in **Answers to the Second Round of Examining Authority's Questions [REP5-271]** in GEN 2.2.	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.2.6	Removal of existing 132kV	National Grid's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with s85 of the Countryside and Rights of Way Act (CRoW), is set out in **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120].** Part of this approach includes the provision of a Dedham Vale National Landscape Fund in addition to the commitment to an initial feasibility study to assess feasibility for the potential PJ Line removal, an existing UK Power Networks overhead line running between Lawford and south of Bramford. The measures identified are sufficient, appropriate and proportionate in accordance with Defra guidance and national policy. For The Applicant's position on furthering the purposes of the National Landscape, including exploring the potential for removal of existing 132kV overhead lines, please refer to Section 3.11 'Furthering the Purposes of the National Landscape' in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** A draft updated unsigned legal agreement was submitted at Deadline 6 in **8.25 National**	NGET and Suffolk CC have reached agreement on a bilateral S106 agreement which covers section 85 of the CROW Act and includes provision for a feasibility study for the removal of the 132kV distribution overhead line. This can be moved to Agreed	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Landscape - DRAFT - Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [REP6-126] and the signed agreement will be submitted at Deadline 7.		
Project development process - Consultation				
3.2.7	2022 non-statutory consultation	Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation and responses to feedback received during consultation are included in **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]**. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	SCC provided full comments regarding the project in the response to the 2022 non-statutory consultation.	Agreed
3.2.8	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation are outlined in the Consultation Strategy, and responses to feedback received during consultation are included **in 5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069**]. The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.	SCC provided full comments regarding the project in the response to the 2023 non-statutory consultation.	Agreed
3.2.9	2024 statutory consultation	Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election.) Details of this consultation are outlined in **5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC)**	SCC provided full comments regarding the project in the response to the 2024 statutory consultation.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		and supporting evidence [APP-071]. Responses to feedback received during statutory consultation are available within **5.1 Consultation Report [Revision B].** The statutory consultation was undertaken in accordance with the published SoCC.		
3.2.10	2025 targeted consultation	Targeted consultations for Suffolk took place from 30 January 2025 – 3 March 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are available within **5.1 Consultation Report - Appendix K: Targeted Consultation 2025 [APP-077].** The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy. The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).	SCC provided full comments regarding the project in the response to the 2025 targeted consultation.	Agreed
Other matters as required				
3.2.11	Community Benefits	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission	SCC has been clear in its stance that community benefits should be offered for all communities hosting Nationally Significant Infrastructure. Whilst community benefits	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. The Applicant will begin consulting in July 2026 on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent and construction starting. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits.	cannot be considered within the planning balance, this solely means that benefits should be above and beyond any mitigation or compensation embedded within the project. SCC considers that the Government's March 2025 community benefit guidance provides sufficient clarity on the level of funding expected. SCC has provided National Grid with its preferences and suggestions for Community Funds including potential delivery opportunities. SCC also considers that National Grid should tailor the benefits to the desires of the communities affected. These preferences should be identified via direct consultation with the Town and Parish Councils and analysis of Neighbourhood Plans (where made).	
3.2.12	Supply and connectivity around the Freeport at Gateway 14	National Grid liaises regularly with electricity Distribution Network Operators (DNO). In East Anglia that is UK Power Networks. Potential opportunities to rationalise, or make new connections to, the local network, or high demand centres, such as Gateway 14 requires a combination of the developer, the DNO and National Grid identifying a need case that would be supported by the regulator, the Office of gas and electricity markets (Ofgem), or funded by some other means. National Grid is required under its transmission licence, to make connections where applications are made including to local networks or demand	SCC Response to Statutory Consultation (29/07/2024): SCC's clear preference is that this project should, in coordination with other infrastructure promoters and owners, resolve local supply and connectivity issues in the Stowmarket area for, and around, the Freeport at Gateway 14.	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		centres. If a connection application is made National Grid would progress it accordingly. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.2.13	Legal agreements	National Grid will secure measures to support the discharge of the statutory duty under section 245 of the Levelling-up and Regeneration Act 2023 (the 'furthering the purposes' duty) through a bilateral obligation with Suffolk CC under section 106 TCPA 1990. An updated unsigned agreement was submitted at Deadline 6 in **8.25 National Landscape - DRAFT - Agreement pursuant to section 106 of the Town and Country Planning Act 1990 [REP6-126]**. The Applicant intends to submit a signed agreement at Deadline 7. Following review, the Applicant is now to secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting resulting from the commitment to replace individual trees and individual trees in small groups at a ratio of 3:1, by requirement and not by a unilateral s106 agreement. The Applicant is committed to continue discussions with SCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	SCC welcomes progress made to date in regard to the matters that the Council outlined for legal agreements in answer to ExQ2 GEN 2.2 **[REP5-271]**. Alongside the other Host Local Authorities, SCC is committed to continuing engagement with the Applicant to resolve these matters.	Under discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.2.14	Compensation / offsetting	As explained by Counsel for National Grid at ISH4, National Grid is also proposing a commitment to secure landscape compensation/offsetting measures. This would be submitted on a "blue pencil" basis and without prejudice to National Grid's position that it does not consider the compensation measures are required by policy and therefore do not meet the relevant policy and legal tests. Further details are set out in 8.5.12 Applicant's Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118], should the Secretary of State consider the measures necessary there is a mechanism to secure these. The Applicant is committed to continue discussions with SCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	SCC welcomes the Masterplans in which the Applicant submitted in response to Action Point 27 of ISH2 **[REP5-199]**. The Council provided commentary on this document in its Comments on D5 Submission **[REP6-167]** and in its Post-Hearing Submission for ISH3/4 **[REP6-166]**. As outlined in answer to ExQ2 GEN 2.2 **[REP5-271],** SCC outlined the justification for the necessity of these location-specific compensatory measures. The Council will continue to provide evidence for its case with regard to the relevant policy tests as set out in EN-1, which building upon those set out in the CIL Regulations 2010 and the NPPF.	Under discussion

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3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 8.2 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment. National Grid confirms that the same policies and legislation have been implemented and considered in the assessment of the outstanding additional survey data.	The policy and legislation detailed and implemented within the ES are considered appropriate in their breadth and content. We expect these same policies, guidance and legislation are implemented and considered in the assessment of the outstanding additional survey data and assessments (to be provided) and will seek confirmation once these documents have been issued.	Agreed
EIA – Approach and Methods				
3.3.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**.	SCC have reviewed the 3% of un-surveyed land and finds that the concerns previously identified in 3.3.3 of Revision B of the SoCG **[REP4-059]** have been resolved	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Further survey information from the 2025 season has been submitted to the Planning Inspectorate in November 2025 achieving coverage of 97% of the Order Limits.		
3.3.4	Assessment Methodology	The assessment methodology was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	National Grid issued a Technical Note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. All methodologies for surveying licensable species have been agreed with Natural England.	Methodologies and scope as detailed within the ES are considered appropriate.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. The key parameters and assumptions presented are considered appropriate. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. The Applicant can confirm that the same parameters and assumptions have been used.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: SCC is content the parameters and assumptions contained within the ES are appropriate. Confirmation that the same parameters and assumptions have been applied to the outstanding data to be released and any unsurveyed area will require confirmation once available for scrutiny and review.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		National Grid confirms that the same parameters and assumptions have been applied to the additional data. The 3% of unsurveyed areas were shown to SCC using a mapping tool during a meeting on 26 May 2026 and SCC agreed that these minor areas of unsurveyed land would not change the significant effects as included in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].**		
EIA – Baseline Conditions				
3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. The baseline conditions and receptors presented are considered appropriate. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: Suffolk County Council are content with the appropriateness of the information presented within the ES.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.3.8	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in the **7.2 Outline**	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: The incomplete survey coverage of sections of the scheme at this time for all or some ecological receptors means it is not	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. No significant changes to the ecological assessment were identified through these additional surveys.	considered possible to fully identify the requirement for, nor appropriateness of embedded mitigation measures in these areas. SCC will be able to comment on release of the outstanding information in November 2025.	
3.3.9	Standard mitigation	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. No significant changes to the ecological assessment were identified through these additional surveys.	The mitigation measures included within the Outline CoCP are considered appropriate based on the receptors identified to date. Additional, currently outstanding, survey results may lead to additional mitigation measures being required for currently unidentified receptors. SCC can confirm the appropriateness and adequacy of the mitigation following release of the outstanding survey data and associated assessments. This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.3.10	Additional mitigation	The consideration of additional mitigation measures is presented in Section 8.6 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]** **and 7.4 Outline Landscape and Ecological Management Plan [Revision G].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. No significant changes to the ecological assessment were identified through these additional surveys.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: SCC is content with the appropriateness and adequacy of the additional measures with regard to the receptors and assessments identified within the ES. Additional, currently outstanding, survey results may lead to additional mitigation measures being required for currently unidentified receptors. SCC can confirm the appropriateness and adequacy, or otherwise, of the mitigation following release of the outstanding survey data and associated assessments. This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above.	Agreed
EIA – Assessment Conclusions				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C].** The assessment of effects during construction presented is considered appropriate. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: Suffolk County Council are content with the assessment of the receptors as detailed within the ES. Appropriateness of the assessment of outstanding survey data cannot be determined until it has been released and scrutinised.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Limits. No significant changes to the ecological assessment were identified through these additional surveys.	This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above.	
3.3.12	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]**. The assessment of effects during operation (and maintenance) presented is \ considered appropriate. Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. No significant changes to the ecological assessment were identified through these additional surveys.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: Suffolk County Council are content with the assessment of the receptors as detailed within the ES. Appropriateness of the assessment of outstanding survey data cannot be determined until it has been released and scrutinised This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and is appropriate for managing construction impacts from the Project. **7.2 Outline Code of Construction Practice [Revision G]** has been updated following review of the November 2025 survey results as well as comments received to date.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Suffolk County Council are content with the appropriateness of the CoCP for managing impacts as outlined within the ES. Appropriateness of the CoCP to manage impacts on the receptors of the scheme which have not yet been detailed or assessed, can only be determined following release of this information and subsequent scrutiny. We	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			would expect the CoCP to be modified to reflect any additional receptors, mitigation, impacts or extent of these, as required, following release of these additional documents. This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above.	
3.3.14	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision C]** and is appropriate for managing operational impacts from the Project. • Further survey information from the 2025 season has been submitted to Planning Inspectorate in November 2025 **[AS-026 to AS-045]**, achieving coverage of 97% of the Order Limits. No significant changes to the ecological assessment were identified through these additional surveys and therefore no significant changes were made to **7.4 Outline Landscape and Ecological Management Plan [Revision G]** as a result of these surveys. Minor amendments to **7.4 Outline Landscape and Ecological Management Plan [Revision G]** were made.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: Suffolk County Council are content with the scope and appropriateness of the LEMP for the receptors and impacts identified and assessed within the ES. Appropriateness of the LEMP in regard to receptors of the scheme which have not yet been detailed or assessed, can only be determined following release of this information and subsequent scrutiny. We would expect the LEMP to be modified to reflect any additional receptors, mitigation, impacts or extent of these, as required, following release of these additional documents. This point is agreed, with the caveat regarding lack of specified information regarding the final unsurveyed 3% as per 3.3.3 above. SCC welcomes the addition of section 11.2 of the latest version of 7.4 Outline Landscape and Ecological Management	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		• An Ecology Working Group will be formed post-DCO consent to provide a long-term interactive and sustainable vehicle for discussing biodiversity matters to meet the requirements of the Norwich to Tilbury Project. The remit of the Ecology Working group is included within **7.4 Outline Landscape and Ecological Management Plan [Revision G].**	Plan [REP3-030] and wishes to express our interest in joining the Ecological Working Group. We await the opportunity to scrutinise and discuss the scope and remit of the group at the earliest opportunity. Matters relating to the Outline LEMP were agreed in a meeting held on the 26th May 2026.	
3.3.15	Breeding / wintering passage birds mitigation	The reference in Table 8.23 within **6.8 Environmental Statement Chapter 8- Ecology and Biodiversity [Revision C]** to habitat creation/enhancement associated with Biodiversity Net Gain (BNG) relates solely on the measures proposed to address permanent habitat loss at the project level. It is not relied upon as mitigation for breeding birds or wintering/passage birds in order to achieve no significant residual effect. Mitigation for these receptors is provided through established construction phase measures and habitat reinstatement, as set out in **7.4 Outline Landscape and Ecological Management Plan [Revision G].**	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Table 8.23 in Chapter 8 indicates that mitigation for loss of habitat for both breeding and winter/passage birds will be at least partially provided by habitat creation/enhancement associated with BNG. BNG is intended to provide a gain to biodiversity and whilst it may provide enhancement to these groups it should not be relied upon to mitigate loss of habitat. The reference to BNG as mitigation habitat should be removed and if this leaves a subsequent lack of mitigation for the proposed impact upon these receptors, alternative mitigation must be provided to ensure no overall negative impact. SCC considers the responses by the applicant to clarify the previous point and considers this issue resolved.	Agreed

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3.3.16	Plant Mixes	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** refers to the replacement planting using the same species as removed or another species locally appropriate. It also includes the requirement for the use of native species. National Grid has updated **7.4 Outline Landscape and Ecological Management Plan [REP5-157]** submitted at Deadline 5 to include the following suggested additions by SCC: reference to local provenance for seed and plant mixes, use of the term every effort and reference to the LNRS for hedgerow reinstatement. The Applicant has further updated **7.4 Outline Landscape and Ecological Management Plan [Revision G]** at the request of SCC to reflect conversations regarding plant mixes and input from ecological professionals and considers this matter agreed	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Mitigation regarding replacement, enhancement and/or creation of habitat should include a commitment to using seed and plants of local provenance in addition to being native. The species and mixes should also be as relevant as possible to the local vicinity of each mitigation area based on information from LNRS and local wildlife organisations. • SCC welcomes the specification of Paragraph 9.2.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]** indicating that plants of local provenance would be sought for planting stock. SCC would like the wording however to be made stronger i.e. "Every effort" rather than "Efforts" to ensure there is the best chance of this request being met. • SCC would also like to see reference to LNRS in the **Outline Landscape and Ecological Management Plan [REP3-030]** when deciding on the locations and type of hedgerow reinstatement, creation and enhancement. SCC welcomes the additional information in the OLEMP indicating the preference for	Agreed

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			native species, local provenance of planting and potential use of green hay as a means of acquiring seed. However, we are conscious that the use of the terms, "will be considered", "where it is deemed more suitable", "where possible" and "where practicable" etc, indicate a degree of decision making without any direct indication of who or on what basis these decisions would be made. SCC requires that the input of an ecological professional be sought in regard to any such decisions, where the quality, type or extent of mitigation, retention or enhancement may be affected by such decisions, E.g. Any such decisions will be made in consultation with and under the advice of the ECoW, with a summary, or list of significant decisions, being reported back to the EWG at the regular meetings. SCC confirmed in June 2026 that this matter can be considered agreed following the wording relating to this topic being updated in the oLEMP at Deadline 6.	
Other matters as required				
3.3.17	Biodiversity Net Gain (BNG) – Onsite, Offsite and assessment	National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. **7.1 Biodiversity Net Gain Report [Revision B]** sets out the approach to BNG. For any BNG deficit offsite BNG will be delivered through collaboration with partners and purchased from	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • SCC welcomes the overall provision of a minimum 10% BNG from the scheme. BNG areas should be	Agreed

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		commercially registered providers. The offsite BNG solution will not be known until the final design is fixed and the metric is re-run post consent.	selected and provided on an as close to impact as possible principle. SCC awaits details on the proposed locations of BNG areas beyond the scheme boundaries.	
3.3.18	BNG – ecology working group	Although formal approval is not required for offsite BNG, all relevant information will be shared with the local authorities for transparency and the Applicant commits to engaging with the Ecology Working Group (EWG) in relation to the offsite BNG measures. The Applicant can confirm that this will include justification for the sites identified and how this will deliver the best outcomes for ecology. However, the Applicant does not agree to the principle that the EWG will have final approval or veto capabilities of the proposed offsite BNG locations. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC would seek assurance that the decision-making process, in regard to offsite BNG site selection, is: undertaken with sound ecological consideration at the forefront; robustly based on ecological reasoning and offering the best outcome for ecology in the areas facing impacts, whenever possible. SCC request the Ecology Working Group receive a report, explaining the rationale for site selection. The EWG will retain the capability to veto any site selection decision where acceptable rationale have not been provided.	Not Agreed
3.3.19	Arboricultural Impact Assessment (AIA)	The AIA was submitted as part of the development consent application as Environmental Statement Appendix 13.6: **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [Revision B]**. Paragraph 9.2.3 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms that "*Trees and shrubs will be of local provenance to minimise the spread*	SCC welcomes the 3:1 replacement planting commitment. The Council considers that local provenance and not just native species for all tree planting should be default when selecting stock. During unforeseen works during construction, any tree loss should be avoided wherever possible through seeking of alternative measures e.g. traffic	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		of pests and diseases. Efforts will be made to source planting stock (procured as early as possible) from local nurseries". Indicative planting schedules sit with Appendix D of **7.4 Outline Landscape and Ecological Management Plan [Revision G].** It is recognised that there may be minor refinements to the planting schedules through the examination process and as detailed designs develop as part of the application for development consent. Paragraph 9.2.5 goes on to state, "*…If difficulties arise with sourcing the proposed species mixes, alternative species will be discussed and agreed with the relevant LPA".* **7.4 Outline Landscape and Ecological Management Plan [Revision G]** Section 8.2.3, and commitment GG14 of the **7.2 Outline Code of Construction Practice [Revision G]**, states that "*following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable".* Construction stages will have Arboricultural Method Statements (AMSs) detailing any works to trees and will be dynamic documents giving consideration to alternative measures. See commitments referring to AMSs such as LV05, LV09 and LV10 in **7.2 Outline Code of Construction Practice [Revision G].**	management rather than visibility splays for temporary access points. SCC requests that Paragraph 9.2.5 be amended to include reference to the Ecology Working Group in addition to the LPA. SCC welcomes the amendment to reflect this request.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The Applicant provided an update with regard to conflict between mature trees and temporary visibility splays within **7.3 Outline Construction Traffic Management Plan [REP5-149]** at Deadline 5 and has made further update at Deadline 6 **[REP6-082]**. Wording includes *'As far as possible, where mature trees and mature hedgerows conflict with a temporary visibility splay, the Main Works Contractor(s) will adopt the principle that all reasonable forms of traffic management are applied (potentially including temporary traffic lights and low speed limits), to enable the retention of the mature trees and mature hedgerows, unless agreed otherwise with the relevant highway authority.'* The Applicant has committed to a post-consent Ecology Working Group, and this has already been included within the **7.4 Outline Landscape and Ecological Management Plan [Revision G].** The Applicant has updated paragraph 9.2.5 within **7.4 Outline Landscape and Ecological Management Plan [Revision G]** as requested.		

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3.4 Contaminated Land, Geology and Hydrogeology

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 9.2 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant proposes this matter is agreed.	The policy, legislation and guidance are considered appropriate and sufficient.	Agreed
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of Section 9.4 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]**.	SCC has not raised concerns.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.4.4	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are within Section 9.4 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]**. The key parameters and assumptions presented are considered appropriate.	SCC has not raised concerns.	Agreed
EIA – Baseline Conditions				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]**. The baseline conditions and receptors presented are considered appropriate.	SCC has not raised concerns.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]**. Embedded	SCC has not raised concerns.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [Revision B]** and set out in the **7.2 Outline Code of Construction Practice [Revision G]**.The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC has not raised concerns.	Agreed
3.4.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 9.6 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC has not raised concerns.	Agreed
EIA – Assessment Conclusions				
3.4.10	Construction effects	The assessment of effects during construction is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [Revision B]**. The assessment of effects during construction presented is considered appropriate.	SCC has not raised concerns.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [Revision B]**. The assessment of effects during operation (and maintenance) presented is considered appropriate.	SCC has not raised concerns.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [Revision B]** and is appropriate for managing construction impacts from the Project.	SCC has not raised concerns.	Agreed

3.5 Health and Wellbeing (including Air Quality and Noise and Vibration)

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in relation to Health and Wellbeing

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.5.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning [Revision B],** Section 10.2 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision**	SCC provided the following comments on their review of the Statement of Common Ground dated 6 November 2025: • Chapter 10 coverage is not fully comprehensive as neither the Suffolk Office of Data & Analytics (SODA), the Suffolk Joint Local Health	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		C], Section 7.2 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B] and** Section 14.2 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. NG provided the following responses to matters raised on 6 November 2025: • Paragraph 10.2.16 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** states that local health and wellbeing strategies, Joint Strategic Needs Assessments and the health priorities they contain, have been used to inform the health and wellbeing assessment. The Suffolk County Council JSNA and Health and Wellbeing Strategy are both referenced within the bibliography and have been reviewed as part of our methodology. Following the above response, the ExA Rule 17 letter **[PD-019]** required submission of an updated version of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** to include IMD 2025 baseline data. The chapter has also been revised to include more specific references to the Suffolk Joint Local Health and Wellbeing Strategy 2022–2027 and the Suffolk Joint Strategic Needs Assessment (JSNA) within	and Wellbeing Strategy 2022–2027 nor the Suffolk Joint Strategic Needs Assessment (JSNA) appear to be considered. The Suffolk Health and Wellbeing Strategy is only briefly mentioned as a baseline source elsewhere in the chapter, with the JSNA referred to in the Bibliography only. SCC acknowledges the Applicant's clarification that the Suffolk JSNA and Suffolk Health and Wellbeing Strategy have been reviewed as part of the assessment methodology and notes the Applicant's intention to address the omission of detailing the health priorities identified within these documents from Table 10.1 through submission of an Errata. SCC are satisfied that Chapter 10 has been sufficiently amended.	

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		Table 10.1, specifically identifying health priorities. This complements existing information within the chapter, **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** for example reference to the Suffolk Joint Local Health and Wellbeing Strategy 2022–202 in paragraph 10.5.16 and more general references in Section 10.5 (Baseline Conditions) to JSNAs where they allude to trends or issues common to a number of local authorities (rather than highlighting every individual instance of an issue being raised); for example paragraph 10.5.22 states that 'mental health and wellbeing is a priority identified in the majority of the JSNAs and Health and Wellbeing Strategies of local planning authorities within the Wider Study Area'.		
EIA – Approach and Methods				
3.5.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	Public Health have no comments to make in respect of air quality.	Agreed
3.5.3	Data sources	The Applicant considers that sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C],** Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B] and** Section 14.4 of **6.14 Environmental**	Section 10.4 and 7.4 - there is no data detailed in either Section SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Neither the Place Based Needs assessment (PBNA), Suffolk Office of Data & Analytics (SODA) nor	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Statement Chapter 14 - Noise and Vibration [Revision B]. The baseline evidence has been compiled using a range of national, regional and local datasets proportionate to the nature of the assessment and the likely health effects identified. NG provided the following responses to matters raised on 6 November 2025: • Section 10.4 lists the data sources that have been used to identify the baseline and inform the health and wellbeing assessment. Section 10.5 presents a summary analysis of baseline data. **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [Revision C]** and **Figures 10.2 to 10.14 [APP-195 to APP-207]**. These data sources are considered to provide appropriate data to enable a proportionate assessment to be undertaken. Similarly, Section 7.4 of the **6.6.F6 Environmental Statement Figure 6.6 - Soil Association Map [APP-146] and** Section 14.4 of the **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** reference data sources for the respective assessments; baseline data for each topic is summarised in Sections 7.5 and 14.5 for Air Quality and Noise respectively. See response to ID3.5.1 in relation	the Suffolk Joint Strategic Needs Assessment (JSNA) are considered (e.g. no mention in Table 10.1). The JSNA is referred to in the Bibliography only. • SCC consider that, regarding Air Quality, the relevant data available has been used. Notwithstanding the Applicant's clarification regarding where baseline data sources are listed within the Environmental Statement and its appendices, SCC considers that the issue raised is not whether data sources have been identified, but whether sufficient use has been made of relevant local health evidence to characterise baseline health vulnerability. In particular, whilst Section 10.4 identifies a range of national and regional datasets, SCC has noted in other sections of this SoCG that locally produced evidence does not appear to have been used to inform the baseline description or interpretation of health and wellbeing conditions, nor referenced within Table 10.1 summarising baseline inputs. Further, specifically in relation to mental health, SCC consider that more comprehensive consideration of data sources should have been applied. Sources such as Public Health Adult Psychiatric Morbidity Survey (APMS), Local Insight, NHS Talking Therapies (IAPT) dashboard data (e.g. access, recovery rates, waiting times), Secondary care mental	

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		to consideration of the Suffolk Joint Strategic Needs Assessment. The Applicant acknowledges SCC's preference for the inclusion of additional local datasets, including the Suffolk Joint Strategic Needs Assessment, Place Based Needs Assessment and specific mental health datasets. However, the Applicant does not agree that the omission of individual datasets renders the baseline characterisation incomplete or undermines the robustness of the assessment. The assessment was undertaken on a proportionate basis and utilised sufficient information to identify vulnerable populations, understand existing health conditions and assess the potential distribution of health effects across the study area. Furthermore, no substantive evidence has been presented to demonstrate that inclusion of the additional datasets identified by SCC would materially alter the assessment findings, the identification of sensitive receptors, or the conclusions reached within Chapter 10. The Applicant therefore considers that the baseline provides an appropriate and robust benchmark against which likely health and wellbeing effects have been assessed. The Applicant has previously responded to SCC's comments regarding the Suffolk Joint Strategic Needs Assessment and other baseline sources (including under ID 3.5.1) and considers that this matter has been fully addressed.	health access / activity data, Mental Health Services Dataset (MHSDS). These data sets would have provided critical contextual information on underlying vulnerability, resilience and service pressure, enabling more meaningful interpretation of how project related stressors may interact with existing and predicted mental health needs and capacity. The Council therefore cannot presently agree that the Applicant's assessment has been undertaken against a robust benchmark. SCC acknowledges that the health and wellbeing assessment has been presented as proportionate, however, the Council considers that proportionality does not preclude the targeted use of established local datasets where this could strengthen understanding of susceptibility and distributional effects, particularly given the cumulative NSIP context in Suffolk. As such, SCC's concern relates to the depth and local relevance of baseline characterisation, rather than the absence of data sources per se.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.5.4	Assessment methodology	The Applicant can confirm that regard has been given to Suffolk's JSNAs and PBNAs, as described in response to matter 3.5.1. Regard has also been had to data available via the Suffolk Office of Data & Analytics (SODA) and this has been referenced in the updated version of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP6-053]** submitted at Deadline 6. Paragraph 10.1.3 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [REP6-053]** notes that the health and wellbeing assessment draws on assessment outcomes from other ES chapters and related documents, including interrelationships and cumulative effects on identified population groups. **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** notes cumulative effects relevant to other proposed developments within a 2km zone of influence for health and wellbeing, with effects summarised in paragraphs 17.5.46 to 17.5.48 and impacts relevant to specific developments reported in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. NG provided the following responses to matters raised on 6 November 2025:	Feedback received on the Technical Note from SCC dated 11 October 2024: Request to pay regard to Suffolk's Joint Strategic Needs Assessment (JSNA) and Place-based needs assessment (PBNA). **Cumulative Impacts.** Please include some summary and context on the implications, noting there are various NSIP's in the area. Public Health did not attend the meeting, we therefore cannot confirm any agreements made within it. SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Neither the PBNA, Suffolk Office of Data & Analytics (SODA) nor the Suffolk Joint Strategic Needs Assessment (JSNA) are considered (e.g. no mention in Table 10.1). The JSNA is referred to in the Bibliography only. SCC welcome the Applicants clarifications regarding use of Suffolk JSNA, as detailed further in item 3.5.1 including details of omissions from Table 10.1. It remains unclear however how the PBNA and SODA have been considered, particularly as it is not referred to in [APP-192] or [APP-193].	Agreed

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		• The Place Based Needs Assessment Tool was reviewed following the Health and Wellbeing Thematic Group meetings; the tool utilises Census data to provide information relating to population, age, ethnicity, disability. This information is considered to have been adequately provided within **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** (Section 10.5 and **6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [Revision C]** as referenced above). See response to ID3.5.1 in relation to consideration of the Suffolk Joint Strategic Needs Assessment. Limitations for the Health and Wellbeing assessment are clearly set out in paragraph 10.4.28 of **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]**. These include the focus on population level impacts, the reliance on third-party, publicly available health data, and the fact that health assessments are by their nature predominantly qualitative and based on guidance and professional judgement, used to interpret the assessment outcomes. Evidence from literature, accepted and adopted by the public health profession has been used in this process and is considered good practice.		

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3.5.5 a	Key parameters and assumptions	Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C],** Section 7.4 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and Section 14.4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The key parameters and assumptions presented are considered appropriate. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft DCO [Revision G]**. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or Bank Holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity. The Applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi-rural locations close to the works. Whilst SCC recognises the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working across the project represents the least harmful approach, nor that alternative phasing or geographically targeted restrictions have been fully explored. Public	Not Agreed

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		flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.	Health therefore maintains that working hours are restricted to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC with start-up and close-down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses. SCC acknowledges the Applicant's clarification regarding Commitments NV01 and NV05 and welcomes the confirmation that detailed construction noise and vibration assessments will be undertaken by the Main Works Contractor(s) and submitted for approval by the relevant LPA. SCC does not consider that these measures fully address the concerns previously raised regarding the proposed construction working hours. The focus of NV01 and NV05 is principally on avoiding significant adverse noise and vibration effects and whilst this is welcomed, the absence of adverse effects from a noise and vibration assessment perspective should not be assumed to equate to an absence of impacts on residential amenity, wellbeing or quality of	

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		Commitments NV01 and NV05 were updated at Deadline 5 (**7.2 Outline Code of Construction Practice [REP5-139]**) to clarify the thresholds for potential significant adverse effects, including at weekend periods. The Main Works Contractor(s) will prepare detailed construction noise and vibration assessments that will be submitted for approval to the relevant LPA as part of the detailed Noise and Vibration Management Plan. The assessments will take account of the relevant noise levels thresholds for the proposed working periods will include specific mitigation measures and temporal restrictions to avoid significant adverse effects. As such, works where there is the potential to cause significant adverse effects at nearby noise sensitive receptors will be subject to targeted temporal restrictions through agreement with the local authorities. As such, works that would not cause significant adverse effects from noise or vibration (i.e. due to distance from receptors, or if the works are quiet) would not be unnecessarily restricted, whereas potential noisy works close to receptors would be subject to targeted temporal restrictions, as required, to avoid significant adverse effects and agreed with the relevant LPA.	life for people living in proximity to the works. Disturbance may arise not only from construction noise itself, but also from workforce movements, construction traffic, lighting, vehicle arrivals and departures, general site activity and the continued presence of construction operations within local communities. Individually these activities may not exceed adverse effect thresholds, they may however contribute to stress, reduced residential amenity and diminished wellbeing where experienced over prolonged periods and particularly when effects are exacerbated by the presence of cumulative impacts from other NSIP activity. SCC is particularly mindful that sensitivity to construction related disturbance varies between individuals and communities. Certain groups, including neurodivergent people, older residents, people with pre-existing mental health conditions, and those who spend greater periods of time at home, may experience adverse effects at levels below those captured by standard noise and vibration significance criteria. The importance of predictable quiet periods and opportunities for respite should therefore not be understated.	

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			SCC therefore maintains its position as set out in answer to ExQ2 DCO 2.S10 **[REP5-271]**.	
3.5.5 b	Key parameters and assumptions	**6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** considered residual effects associated with changes to noise and vibration during the construction phase. Paragraph 10.7.13 of Chapter 10 summarises impact pathways which include the impact that noise-related stress can have on people. Paragraph 10.7.14 identifies groups who may be particularly vulnerable to noise-related effects, including older people, people with pre-existing physical and mental health conditions, and people in low-income households (a higher proportion of whom are less likely to have access to private vehicles). These groups are assessed as having sensitivity to changes in noise level. The assessment of likely health effects has been informed by findings from **6.14 Environmental Statement Chapter 14 – Noise and Vibration [Revision B]**. This chapter has identified a range of potential mitigation measures that would be implemented during the construction phase. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** notes that the magnitude of impact on health is therefore considered to be negligible with a resulting negligible and not significant effect across all wards for both general and vulnerable	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity. The Applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi-rural locations close to the works. Whilst the Applicant concludes that residual effects are negligible and not significant, this	Not Agreed

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		populations; and that health effects are likely to be experienced at individual rather than at population level, accordingly. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 **of 7.2 Outline Code of Construction Practice [Revision G]**, including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Commitments NV01 and NV05 were updated at Deadline 5 (**7.2 Outline Code of Construction Practice [REP5-139]**) to clarify the thresholds for potential significant adverse effects, including at weekend periods. The Main Works Contractor(s) will prepare detailed construction noise and vibration assessments that will be submitted for approval to the relevant LPA as part of the detailed Noise and Vibration Management Plan. The assessments will take account of the relevant noise levels thresholds for the proposed working periods will include specific mitigation measures and temporal restrictions to avoid significant adverse effects. As such, works where there is the potential to cause significant adverse effects at nearby	does not necessarily demonstrate that the proposed working hours represent the most appropriate approach to protecting residential amenity, wellbeing and quality of life for communities living in proximity to the works. The Applicant's reliance on NV01, NV05 and other DCO controls remains principally focused on avoiding significant adverse effects by reference to technical thresholds. Whilst this is an important control, it does not fully address the broader public health concern that extended daily working, weekend and Bank Holiday working, start-up and close-down activities, workforce movements, construction traffic, lighting, general site activity and the continued presence of construction operations may cumulatively reduce opportunities for predictable respite. These effects may be experienced as disruptive or stressful even where significant adverse noise or vibration thresholds are not exceeded. SCC maintains its position that the proposed construction working hours remain too extensive to adequately safeguard public health, residential amenity and community wellbeing, particularly in the context of cumulative impacts from other NSIP activity. SCC therefore maintains its position as set	

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		noise sensitive receptors will be subject to proportionate temporal restrictions through agreement with the local authorities. As such, works that would not cause significant adverse effects from noise or vibration (i.e. due to distance from receptors, or if the works are quiet) would not be unnecessarily restricted, whereas potential noisy works close to receptors would be subject to potential temporal restrictions, as required, to avoid significant adverse effects and agreed with the relevant LPA.	out in answer to ExQ2 DCO 2.S10 **[REP5-271]**.	
EIA – Baseline Conditions				
3.5.6 a	Baseline conditions and receptors	The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C],** Section 7.5 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and Section 14.5 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** of the ES. The baseline conditions and receptors presented are considered appropriate.	Baseline conditions are sections 7.6 and 10.6. Section 7.6 - The baseline conditions and receptors presented appear reasonable.	Agreed
3.5.6 b	Baseline conditions and receptors	The Applicant notes SCC's comments regarding the consideration of protected characteristics and vulnerable groups within the Health and Wellbeing assessment. The Applicant does not agree that the absence of certain protected characteristics from the baseline data review represents a deficiency in the assessment.	Section 10.6 does not include some of the protected characteristics namely Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation. These aside, the baseline	Not agreed

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		Table 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** identifies those vulnerable groups considered to be relevant to the assessment (i.e. those for which evidence suggests that there may be potential impacts arising from the project); baseline data was therefore collated and analysed for these groups where there was a plausible impact pathway. An Equality Impact Assessment was prepared for the project (**7.14 Equality Impact Assessment [APP-352]**) which covers all protected characteristics under the Equality Act 2010 and specifically assesses the potential for disproportionate or differential effects across those groups. The EqIA draws upon the findings of the Environmental Statement, including the Health and Wellbeing assessment, and identifies where particular groups may experience differing effects as a result of the Project.. The Applicant does not agree that the EqIA can only be considered in isolation or that it has not informed the wider assessment process. The Health and Wellbeing assessment and EqIA were developed as complementary assessments, drawing upon a common evidence base and considering the needs and vulnerabilities of sensitive population groups. The Health and Wellbeing assessment identifies and assesses community health outcomes, whilst the EqIA considers whether those effects	conditions and receptors presented appear reasonable. SCC notes that the **Equality Impact Assessment (EqIA) [APP-352]** identifies a range of potential adverse impacts on protected characteristic groups, including those arising from construction noise, vibration, traffic, air quality, changes in landscape and views, and temporary disruption to Public Rights of Way. The EqIA recognises that such effects may be experienced disproportionately or differentially by different groups. Public Health does not consider however, that the conclusions of the EqIA can be relied upon in isolation to demonstrate that equality impacts on mental health and wellbeing are minimal. Whilst the EqIA indicates in Paragraph 2.1.10 that equality impacts associated with different types of likely significant environmental, including health and wellbeing have been considered, it is not clear how identified susceptibilities associated with age, disability, neurodivergence or other protected characteristics have materially informed the health baseline, sensitivity classifications, or the assessment of mental health and wellbeing outcomes within the Health and Wellbeing chapter itself. In particular, the EqIA identifies potential differential effects relating to anxiety,	

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		may be experienced differently by persons with protected characteristics. For each of the health determinants scoped into the assessment presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]**, an overview of current evidence and impact pathways has been provided; this includes an overview of potential susceptibilities associated with specific population groups, for example in relation to air quality during construction, paragraph 10.7.5 notes that susceptible populations and vulnerable groups include children, older people, those in low socio-economic households and those with existing underlying health conditions. This understanding of vulnerability has been carried through into the assessment of likely health outcomes for each health determinant. The assessment presented in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C]** does not identify significant mental health and wellbeing effects that would justify the preparation of a post-consent Mental Health and Wellbeing Monitoring Plan. The Applicant's position remains that, in the absence of identified significant effects, such monitoring would not be proportionate or necessary. The Applicant has not been provided with evidence demonstrating that the conclusions of the assessment would materially change through the inclusion of	distress and sensitivity to noise, visual change and disruption, yet it does not demonstrate how these considerations have been systematically embedded within the health impact assessment, nor how they have informed judgements on the magnitude or significance of mental health effects for vulnerable groups. SCC considers that the EqIA does not of itself, resolve concerns regarding the potential for disproportionate mental health and wellbeing impacts on protected and vulnerable groups, particularly in the context of cumulative and prolonged exposure arising from construction activities and interaction with other NSIPs in the area. This reinforces Public Health's position that a proportionate, post consent Mental Health and Wellbeing Monitoring Plan is necessary to ensure that equality-related mental health impacts are identified, understood and addressed in practice over the lifetime of the Project. SCC confirmed this matter is Not agreed during a call on 22 June 2026.	

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		additional baseline information or monitoring requirements. Accordingly, the Applicant considers that the baseline characterisation, assessment methodology, Health and Wellbeing assessment and Equality Impact Assessment together provide a robust and proportionate assessment of impacts on vulnerable and protected groups. The Applicant therefore maintains that no additional assessment or monitoring is required. As SCC has confirmed that its position remains unchanged, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.5.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing**) **[Revision C],** Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Embedded mitigations are sections 7.7 and 10.7. Section 7.7 - Embedded mitigation appears reasonable, in terms of its nature and scale, to address potential effects at this stage (10/02/2025). Section 10.7 - Embedded mitigation appears reasonable at this stage (10/02/2025).	Agreed
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are	Standard mitigations are Sections 7.7 and 10.7	Agreed

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		summarised in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing**) **[Revision C],** Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision C]** and Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision C]** of the ES and set out in the **Outline Code of Construction Practice [Revision G]**.	Section 7.7 - The standard mitigations appear reasonable, in terms of its nature and scale, to address potential effects. Section 10.7 - The standard mitigation appears reasonable, in terms of its nature and scale, to address potential effects. Public Health have no comments to make in respect of Noise and Vibration throughout. Public Health have not had sight of CoCP and cannot therefor comment upon it. SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Public Health have no comments to make in respect of air quality.	
3.5.9	Additional mitigation	The consideration of additional mitigation measures is presented in Section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C],** Section 7.6 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and Section 14.6 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Additional mitigations are Sections 7.7 and 10.7 Section 7.7 - The additional mitigations appear reasonable, in terms of its nature and scale, to address potential effects at this stage (10/02/2025). Section 10.7 - The additional mitigations appear reasonable at this stage (10/02/2025). Public Health have no comments to make in respect of Noise and Vibration throughout.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • No additional mitigation identified relating to air quality beyond embedded and standard as not required. Public Health therefore have no comments on this.	
EIA – Assessment Conclusions				
3.5.10 a	Construction effects	The assessment of effects during construction is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C],** Section 7.7 of **6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B].** The assessment of effects during construction presented is considered appropriate.	Section 7.7 - the assessment of the effects on air quality during construction appears reasonable at this stage (13/10/2025). Section 10.8 - the assessment of effects during construction appears reasonable at this stage (10/02/2025). Public Health have no comments to make in respect of Noise and Vibration throughout.	Agreed
3.5.10 b	Construction effects	The Applicant provided the following responses to matters raised on 6 November 2025: • Further detailed construction vibration assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • 12.11 A significant adverse effect from construction traffic noise has been identified at Bentley Road (PAR 30), with a predicted increase of 11.4 dB, exceeding the Significant Observed Adverse Effect Level (SOAEL). The Outline Construction Traffic Management Plan proposes mitigation measures and whilst these measures	Agreed

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		(which will be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [Revision D]**). Given the nature of this location, mitigation options are limited and it is conceded that significant adverse effects may not be avoidable at this location. However, mitigation measures would be put in place to mitigate and minimise impacts as far as practicable. Mitigation measures already incorporated are speed restrictions, and a widening of the road which serves to move vehicles further away from the property. • The construction vibration assessment presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** uses reasonable worst-case assumptions for vibration generating activities and does not include mitigation. As noted, the source of vibration leading to potential exceedances is from vibratory compaction. In practice, this can be readily mitigated by use of an alternative method, such as dead rolling (i.e. not using the vibrator when rolling). As such, in practice, the SOAEL is not expected to be exceeded at any location. Further detailed construction vibration assessments will be undertaken by the Main Works Contractor(s) as per commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** based on their	may help reduce noise, the Environmental Statement acknowledges in 14.7.36 that "*major significant adverse effects from construction traffic noise would still be expected on Bentley Road*" From a Public Health perspective, it is essential to recognise that the proposed mitigation may not be sufficient to prevent significant adverse impacts on residents' health and wellbeing. It is recommended that the applicant explores further site-specific mitigation options, this should include ongoing engagement with affected residents and robust monitoring. • The Chapter identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level (SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily due to compaction activities associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant. There does however appear	

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		specific methodologies. Based on the findings of these assessments, specific BPM mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which would be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [Revision D]**). The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration, and this would form part of the implementation of BPM. Additionally, commitment NV04 of **7.2 Outline Code of Construction Practice [Revision G]** includes for pre- and post-condition surveys to be conducted in situations where there is a potential for building and structural damage, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works. However, in practice such high levels of vibration would not be expected, particularly with the implementation of standard BPM. Commitment NV24 in **7.2 Code of Construction Practice [REP4-164]** has been introduced at Deadline 4 to address concerns regarding noise from construction traffic on Bentley Road, stating: *"A bespoke noise mitigation strategy will be prepared for Jasmine Cottage, Bentley Road,*	to be any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan or the Environmental Statement. From a Public Health perspective, whilst the use of BPM is welcomed, it is recommended that the applicant provides greater clarity on how vibration impacts will be monitored and mitigated during construction. SCC understand that the Applicant is working with Tendring District Council to reach agreement on this point and subject to their agreement SCC is happy to move this matter to agreed.	

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		Little Bentley prior to the start of works to mitigate construction noise levels to nonsignificant levels as far as practicable, both inside the dwelling and in the garden areas. In principle this may include the offer of acoustically rated glazing and ventilation to achieve suitable indoor ambient noise levels (as suggested in BS 8233:2014), and the offer of acoustic fencing (which may be subject to planning permission) to achieve suitable external amenity levels (as BS 8233:2014). *Further review of construction traffic noise on other noise sensitive receptors along Bentley Road will be undertaken prior to the start of works, and appropriate mitigation may be implemented to reduce construction traffic noise levels as far as practicable. This may include the offer of sound insulation and alternate ventilation via bespoke noise mitigation strategies if other mitigation options (such as screening) are not viable for avoiding significant adverse effects."* **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP6-080]** has been updated for Deadline 6 to clarify the position on noise and vibration monitoring. Monitoring locations and protocols will be agreed with the relevant Local Planning Authorities as part of the detailed Noise and Vibration Management Plan. This clarifies that monitoring is not just to be secured by Section 61 applications, or following		

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		complaints, but is an intrinsic part of the noise and vibration management process. The Applicant therefore considers this matter to be Agreed and can confirm that this matter is agreed within the Tendring District Council SoCG.		
3.5.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 10.7 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C]** and Section 14.7 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]. The** assessment of effects during operation (and maintenance) presented is considered appropriate. An assessment of operational and maintenance effects on air quality was screened out in **6.19 Scoping Report [APP-296]** and was agreed within **6.20 Scoping Opinion [APP-297].**	Section 7.8 - the assessment of effects during operation (and maintenance) presented appears reasonable at this stage (10/02/2025). Section 10.8 - the assessment of effects during operation (and maintenance) appears reasonable at this stage (10/02/2025). Public Health have no comments to make in respect of Noise and Vibration throughout.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12 a	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant mitigation measures specified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [Revision C], 6.7 Environmental Statement Chapter 7 - Air Quality [Revision B]** and **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]** of the ES and is appropriate for managing construction impacts from the Project.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Chapter 14 identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level (SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily due to compaction activities	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The Applicant provided the following responses to matters raised on 6 November 2025: • Outline noise and vibration mitigation measures are described in **7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [Revision D]**), rather than the **Outline Construction Traffic Management Plan [Revision G]**. • Further detailed construction vibration assessments will be undertaken by the contractor, as per Commitment NV05 of **7.2 Outline Code of Construction Practice [Revision G]** based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [Revision D]**). The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration. Additionally, Commitment NV04 of **Outline Code of Construction Practice [Revision G]** includes for pre- and post- condition surveys to be conducted in situations where there is a potential for building and structural damage and includes a commitment to rectify any damage (cosmetic or	associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant. There does however appear to be any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan. From a Public Health perspective, whilst the CoCP commits to "Best Practicable Means" (BPM) and preparation of a Noise and Vibration Management Plan, it does **not** commit to any site-specific mitigation or vibration monitoring at NSRs where SOAEL may be exceeded. • ES Chapter 14 (Noise and Vibration) identifies Significant adverse noise effects at Jasmine Cottage (Bentley Road) and other locations due to construction traffic. The **Outline CoCP** refers to "detailed construction noise and vibration assessments" and a Noise and Vibration Management Plan, but does **not** commit to continuous or	

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		otherwise) deemed to be caused by the works.	attended noise monitoring at high-risk NSRs or mitigations. Having considered the Applicant's explanation, SCC has nothing further to add on this matter and agrees that this item can now be closed as 'agreed'.	
3.5.12 b	Outline CoCP	The core working hours are secured in Requirement 7 (Construction Hours) of **3.1 Draft DCO [Revision G]** (draft DCO). The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor	• SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions, raises concerns about the adequacy of protection for public health and residential amenity. The applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start-up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural	Not Agreed

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		ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday, Bank Holiday and other public holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. Requirement 7(4) of Schedule 3 of **3.1 Draft DCO [Revision G]** permits start up and close down activities to take place up to an hour either side of the core working hours. Start up and close down activities are defined	and semi-rural locations close to the works. The strategic need case and delivery pressures are noted. However, from a public health perspective, infrastructure delivery must be balanced against the protection of community health and wellbeing. Extended core working hours, including routine Sunday and Bank Holiday working, have the potential to materially reduce predictable periods of respite for affected communities over a prolonged construction programme. Environmental health and public health practice recognises that sustained noise, vibration and activity outside conventional weekday hours can contribute to sleep disturbance, stress, reduced respite, and wider mental wellbeing effects, even where technical thresholds for "significance" are not exceeded. Development of nationally significant infrastructure should not come at a disproportionate cost to community mental health and quality of life, particularly where impacts are experienced over extended durations. Whilst SCC recognises the need for a degree of programming flexibility, SCC considers that the Applicant has not demonstrated that the proposed lengthy working hours alongside routine weekend and Bank Holiday working across the onshore elements represents the least	

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		in Schedule 3 of the draft DCO. The Applicant considers that the provision for start up and close down activities to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in **7.2 Outline Code of Construction Practice [Revision G].** The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G]** including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Commitments NV01 and NV05 were updated at Deadline 5 (**7.2 Outline Code of Construction Practice [REP5-139]**) to clarify the thresholds for potential significant adverse effects, including at weekend periods. The contractor will prepare detailed construction noise and vibration assessments that will be submitted for approval to the relevant LPA as part of the	harmful approach, nor that alternative phasing or geographically targeted restrictions have been fully explored. SCC recommend that working hours are restricted to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC with start-up and close-down periods strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses, including an agreed noise level limitation. SCC acknowledges the Applicant's further explanation regarding programme resilience, shift patterns and the operational flexibility sought. Whilst the strategic need for the Project and the importance of timely delivery are recognised, Public Health continues to consider that the protection of community health, wellbeing and residential amenity requires the provision of predictable and meaningful opportunities for respite from construction activity. SCC therefore maintains its position as set out most recently in response to ExQ2 DCO 2.S10 **[REP5-270]**.	

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		detailed Noise and Vibration Management Plan. The assessments will take account of the relevant noise levels thresholds for the proposed working periods will include specific mitigation measures and temporal restrictions to avoid significant adverse effects. As such, works where there is the potential to cause significant adverse effects at nearby noise sensitive receptors will be subject to targeted temporal restrictions through agreement with the local authorities. As such, works that would not cause significant adverse effects from noise or vibration (i.e. due to distance from receptors, or if the works are quiet) would not be unnecessarily restricted, whereas potential noisy works close to receptors would be subject to targeted temporal restrictions, as required, to avoid significant adverse effects and agreed with the relevant LPA. The Applicant has commented extensively on the justification for the proposed working hours, including responses to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074**] and DCO 2.S10 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211].** The Applicant has further responded to SCC's concerns on the construction working hours in **8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 Appendix A [REP6-117].**		

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3.6 Historic Environment

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in relation to Historic Environment

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EIA – Regulatory, Planning Policy Context and Guidance				
3.6.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning [Revision B]** and Section 11.2 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Historic England guidance should be included within chapter 2.6 non-statutory guidance. NPPF should be referenced in chapter 11. SCC advised during a call in January 2026 that this matter can be considered agreed. EPS (Built Heritage) note that based on a further review of the identification and assessment of the value of NDHA buildings in Document: **6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209]** we are able to agree this matter.	Agreed
EIA – Approach and Methods				
3.6.2	Study area	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources (Archaeology)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**. **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** has been produced	SCC Archaeology - The baseline information presented in chapter 11 of the PEIR provides an initial assessment of the heritage assets, however for archaeology this information has not been used to provide an assessment of archaeological potential. This would be further informed by the results of geophysical survey and trenched archaeological evaluation. For archaeology the Heritage	Agreed

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		in accordance with industry standard guidance (CIFA (2014) Standard and guidance for historic environment desk-based assessment) and the Applicant considers it to be fit for purpose. Whilst there is no 'Archaeological Potential' section within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C]** the archaeological potential of the Project is considered throughout the baseline narrative, which includes discussion about the nature of the archaeological resource along the route by location and period. Assessment reporting has been completed for all of the priority evaluation areas for which access was possible. The results of those reports received since the submission of supplementary environmental information in January 2026 have been reviewed against the existing historic environment baseline and assessment (**6.11 Environmental Statement Chapter 11 - Historic Environment [REP6-059]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and there are no changes. The results of the phase 2 geophysical survey and supplementary historic environment baseline and assessment have been submitted at Deadline 6 (**6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**). The Applicant therefore considers that an	Asset Value is not the same as archaeological potential. SCC advised during a call in January 2026 that this matter is still under discussion pending further review of the documents. SCC advised during a call held on 23 June 2026 that this matter can be considered agreed. SCC considered there were missed opportunities for providing focus.	

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		appropriate amount and level of detail of baseline information has been provided to inform examination.		
3.6.4	Data sources (Built Heritage)	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**. Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The **Historic Environment Baseline Report (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [Revision C])** is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.	EPS Built Heritage confirmed that this matter is agreed following a meeting in January 2026.	Agreed
3.6.5	Assessment methodology (Archaeology)	The methodology for assessing Historic Environment was agreed through **6.19 Scoping Report [APP-288 to APP-296]**	SCC advised following a call held on 23rd June 2026 that this matter can be considered agreed.	Agreed

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		and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		
3.6.6	Assessment methodology (Built Heritage)	The methodology for assessing Historic Environment was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. The Scoping Opinion stated: "*The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.*" SCC raised at statutory consultation that they did not agree with the value of Grade II listed buildings as medium value assets. However, there is precedent for the approach proposed and professional judgement is always used when assigning value to heritage assets. Therefore, as per the Scoping Opinion report, the majority of Grade II listed buildings will remain medium value assets. The Applicant position regarding non-designated heritage assets is as outlined in Section 3.6.1 (Policy and Legislation) above.	EPS Built Heritage confirmed their agreement on this matter following a call in January 2026.	Agreed
3.6.7	Key parameters and assumptions (Archaeology)	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11-**	The currently available information has been presented within chapter 11, however, the collated information should be used to inform on the initial archaeological	Agreed

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	Priority Survey Areas	**Historic Environment [Revision D].** The key parameters and assumptions presented are considered appropriate. Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the **Supplementary Environmental Information [AS-068 to AS-083]**. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of **Supplementary Environmental Information [AS-068 to AS-083]**. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork was largely completed in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination. Assessment reporting has been completed for the vast majority of the priority evaluation areas for which access was possible. The results of those reports received since the submission of supplementary environmental information in January 2026 have been reviewed against the existing historic environment baseline and assessment (**6.11 Environmental Statement Chapter 11 - Historic Environment - Clean**	potential of sections of the route. This baseline information would then be further informed by geophysical survey and trenched archaeological evaluation. October 2025 – SCC Archaeological Service – This needs to clearly state that the archaeological evaluation is required to fully define key parameters and assumptions. The FULL evaluation will not be completed prior to decision, and this document needs to clearly state that there will be further phase(s) of archaeological evaluation (both Geophysical Survey and Trial Trenching) to inform appropriate archaeological mitigation. June 2026 – SCC Archaeological Service. Baseline information has been superseded by the archaeological evaluation, both geophysical survey and trial trenching of the priority areas. SCC advised during a call held on 23 June 2026 that this matter can be considered agreed.	

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		Version [REP6-059] and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and there are no changes.		
3.6.8	Key parameters and assumptions (Archaeology) Remaining Archaeological Evaluation	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D].** The key parameters and assumptions presented are considered appropriate. It is intended to submit the results of the Phase 2 geophysics fieldwork that has been completed up to the 17 April 2026 into Deadline 6 of the Examination. This would then represent a combined total of 92% (approximately 2050ha) of the overall geophysical survey area and the area of intrusive impact for the Project. The Applicant agrees with SCC that enough information has been provided to inform assessment and decision making. The Applicant accepts that further evaluation (the Phase 2 trial trenching) is required to inform mitigation for areas of impact. This further evaluation work is planned and Site Specific WSIs for these works will be agreed with SCC. Any post-consent evaluation (and mitigation) will be agreed with SCC through Detailed WSIs.	The currently available information has been presented within chapter 11, however, the collated information should be used to inform on the initial archaeological potential of sections of the route. This baseline information would then be further informed by geophysical survey and trenched archaeological evaluation. October 2025 – SCC Archaeological Service – This needs to clearly state that the archaeological evaluation is required to fully define key parameters and assumptions. The FULL evaluation will not be completed prior to decision, and this document needs to clearly state that there will be further phase(s) of archaeological evaluation (both Geophysical Survey and Trial Trenching) to inform appropriate archaeological mitigation. SCC advised during a call held on 23 June 2026 that this matter can be considered agreed.	Agreed
3.6.9	Key parameters	Key parameters and assumptions associated with the Historic Environment assessment are	EPS (Built Heritage) is in agreement with	Agreed

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	and assumptions (Built Heritage)	summarised in Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [REP6-059]**. The key parameters and assumptions presented are considered appropriate.	the matter following review of the ES.	
EIA – Baseline Conditions				
3.6.10	Baseline conditions and receptors (Archaeology)	Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the Supplementary Environmental Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project. The results of the Phase 2 geophysics fieldwork that has been completed up to the 17 April 2026 was submitted into Deadline 6 of the Examination (**6.11.A8 Environmental Statement Appendix 11.8 - Phase 2 Geophysical Survey [REP6-065]**). This would then represent a combined total of 92% (approximately 2050ha) of the overall geophysical survey area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas (approximately 3000 trenches) at the point of submission of **Supplementary Environmental Information [AS-068 to AS-083]**. The remaining 11% of the priority archaeological	SCC Archaeology - 11.5.26 & 11.5.36 – states that there will be non-intrusive and intrusive archaeological evaluation, this should clearly indicate that this will not be completed for the full route for the purposes of the ES, prior to the submission. There must be clear indication for examination that there will be further archaeological evaluation for areas not subject to pre-submission archaeological evaluation. The results of the full archaeological evaluation will inform on archaeological mitigation. SCC Archaeology noted in a meeting in January 2026 that this matter would remain under discussion whilst survey work continues. SCC considers that following the explanatory notes provided by the Applicant in SoCG ID 3.6.8 and 3.6.10 that this matter is agreed.	Agreed

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		trial trenching is in progress and fieldwork was largely completed in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination. The Applicant agree with SCC that enough information has been provided to inform assessment and decision making. The Applicant accepts that further evaluation is required to inform mitigation for areas of impact.		
3.6.11	Baseline conditions and receptors (Built Heritage)	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**. The baseline conditions and receptors presented are considered appropriate. Further detail relevant to this section are outlined in Section 3.6.3 (Data Sources).	Following a call in January 2026, EPS (Built Heritage) confirmed agreement on this matter.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.12	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC Archaeology - The embedded mitigation measures need to recognise that there is the potential for the significance of identified heritage assets to increase following further investigation, and for previously unidentified heritage assets of archaeological interest to be identified during the process of evaluation. 11.6.2 - There needs to be consideration	Agreed

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		7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [REP4-166] was updated with additional text for Deadline 4 as set out in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. Provisions to continue evaluation and undertake mitigation, including the provision for preservation in situ, are already contained in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** (submitted at Deadline 5) and Requirement 5 of **3.1 Draft DCO [Revision G]**. See ID 3.6.22 for further discussion on this matter. The other comments from SCC are addressed under 3.6.15 Additional Mitigation.	for organic deposits, such as peats and organic silt deposits, to contain evidence of past environments and human activity. SCC Archaeology have provided further details regarding this matter in the LIR. June 2026 – SCC Archaeological Service The Embedded mitigation measures set out in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** are agreeable. The appropriate mitigation measures for archaeological heritage assets will be defined in the OAMS-OWSI and detailed WSIs, which are still under discussion and covered by a separate matter (ID 3.6.22) in the SoCG. SCC advised in a call on 23 June 2026 that this matter can be considered agreed.	
3.6.13	Standard mitigation (Archaeology)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [Revision D] and** set out in the **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Provisions to continue evaluation and undertake mitigation, including the provision for preservation in situ, are already contained in **7.5 Outline Archaeological Mitigation**	SCCAS – 11.7 - The archaeological evaluation will not have been completed for the whole route for the purposes of the ES and Examination. Therefore, there would be insufficient baseline information to inform an archaeological mitigation strategy for the whole route. Within the archaeological mitigation strategy and OWSI there should be provision for full archaeological evaluation to be completed to inform on archaeological mitigation. SCC Archaeology have provided further details regarding this matter in the LIR.	Agreed

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		Strategy and Outline Written Scheme of Investigation [REP5-161] (submitted at Deadline 5) and Requirement 5 of **3.1 Draft DCO [Revision G]**. See ID 3.6.22 for further discussion on the OAMS-OWSI.	June 2026 – SCC Archaeological Service The Standard mitigation measures set out in Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** and **7.2 Outline Code of Construction Practice [REP4-164]** have been superseded by the **7.2 Outline Code of Construction Practice [REP5-139]** (commitment references H01 – H08) and can be considered agreed. However, mitigation for archaeology will be managed through the OAMS-OWSI (including further phases of evaluation) this document is yet to be approved and remains under discussion (see ID 3.6.22) and will supersede Section 11.6 of **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**.	
3.6.14 a	Standard Mitigation (Built Heritage)	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and set out in the **7.2 Outline Code of Construction Practice [Revision G]** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls,	This matter is agreed with regards to commitment H06.	Agreed

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		and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]**. Specifically, this means: Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature. Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists. Species selection for replanting (e.g., hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible. If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.		
3.6.14 b	Standard Mitigation (Built Heritage)	Regarding **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision D]** did not identify any heritage assets in Suffolk that would be impacted by the Project. The vibration assessment identified one historic	Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District	Agreed

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		structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence, the current approach in H07 and the associated NV04 of **7.2 Outline Code of Construction Practice [Revision G]** is considered to be appropriate. As outlined in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision D]** a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. In addition, **7.2 Outline Code of Construction Practice [Revision G]**, commitment GG30 includes: "A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken."	(which is not a dwelling) we would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects. SCC advised in June 2026 that they defer to BMSDC on this, therefore the matter can be considered agreed.	

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		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.6.15	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision G]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. April 2025, the Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project. May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161**] with the intention that any further comments can be addressed and included for submission at Deadline 5. See ID 3.6.22 for further discussion on the OAMS-OWSI.	The archaeological evaluation will not have been completed for the whole route for the purposes of the ES and Examination. Therefore, there would be insufficient baseline information to inform an archaeological mitigation strategy for the whole route. Within the archaeological mitigation strategy and OWSI there should be provision for full archaeological evaluation to be completed to inform on archaeological mitigation. SCC Archaeology note that this matter is secured through the AMS WSI and this will remain under discussion until the updated document is issued and reviewed. EPS noted during call in January 2026 that this matter is not relevant for Built Heritage. June 2026 – SCC Archaeological Service We are not requiring any amendments to Section 11.6 of **.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. This matter can be considered agreed. However, paragraph 11.6.11 references the OAMS-OWSI, and it should be noted that this document is currently not agreed (see ID 3.6.22).	Agreed

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EIA – Assessment Conclusions				
3.6.16	Construction effects (Archaeology)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The assessment of effects during construction presented is considered appropriate. The status of geophysical survey and intrusive fieldwork is set out at 3.6.10 above. As set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** (submitted at Deadline 5) the construction compounds were evaluated as part of the priority phase of fieldwork. The 132kV underground cable, haul road and pylon working areas form part of the phase 2 element of the works, and the majority of geophysical survey for this is now complete. As the sites for ecological compensation beyond the Order Limits have not yet been defined no evaluation of these is yet possible. In order to be registered on Natural England's off-site Biodiversity Net Gain (BNG) register, a series of steps are undertaken which includes consideration of other environmental constraints such as archaeology. No specific commitments regarding off-site BNG locations and archaeology as part of this Development Consent Order are therefore necessary or possible. Works within the Order Limits would be subject to the programme of archaeological works	Email from SCC – 4 Nov 2024 - Archaeology – consultants not assessing significant areas of 132kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. The archaeological potential of undergrounding of the 132kV, haul road, and temporary construction compound location have the potential to form a constraint on the development if they are not assessed prior to determination. Sites for ecological compensation beyond the order limits have the potential to have significant impacts upon heritage assets, these sites will need to be archaeologically assessed and evaluated to determine if they would be suitable for the purposes of ecological compensation. SCC Archaeology have provided further details regarding this matter in the LIR. SCC raised a question during a call on 23rd June 2026 asking is the Applicant can consider archaeology with regard to BNG. June 2026 – SCC Archaeological Service The construction effects on known archaeological heritage assets, designated and non-designated, are presented in Section 11.7 of Environmental Statement Chapter 11 – Historic Environment [AS-068]. The assessment of these effects remains as reported in the Environmental Statement and	Agreed

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		secured through **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]**, which already includes provision for environmental mitigation. The details of this would be set out in subsequent DWSIs.	reflects the information available at the time of assessment. It cannot take account of any new information derived from the programme of ongoing archaeological evaluation, which will be managed through the OAMS-OWSI. See ID 3.6.22 for further discussion on the OAMS-OWSI. SCC advised following a call held on 23rd June 2026 that this matter can be considered agreed.'	
3.6.17	Construction effects (Built Heritage)	The assessment of effects during construction is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. The assessment of effects during construction presented is considered appropriate.	Following a call in January 2026, EPS (Built Heritage) confirmed that this matter is agreed.	Agreed
3.6.18	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D].** The assessment of effects during operation (and maintenance) presented is considered appropriate. The results of the fieldwork will be provided to the relevant Historic Environment Records, to enable them to be incorporated in the record for the county to inform any future works/development. The operational phase maintenance of the Project would not introduce any new physical impacts and so there would	SCC Archaeology - Any areas of preservation in situ or areas of significance archaeology that are identified during the evaluation, but not impacted by the construction, should be mapped and recorded by National Grid to ensure future maintenance does not disturb these heritage assets. SCC Archaeology have provided further details regarding this matter in the LIR. June 2026 – SCC Archaeological Service The assessment of these effects remains as reported in the Environmental Statement and reflects the information available at the time of assessment. It cannot take account of any	Agreed

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		be no potential for additional physical impacts to archaeology during this period.	new information derived from the programme of ongoing archaeological evaluation, and any changes to final design, which will be managed through the OAMS-OWSI. See ID 3.6.22 for further discussion on the OAMS-OWSI. This matter is considered agreed (23.6.2026) with regard to the conclusions for assessment.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.19 a	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]** and is appropriate for managing construction impacts from the Project. The Applicant will not commission the production of a Historic Environment Management Plan (HEMP). Preservation in situ for appropriate assets will be achieved through **7.2 Outline Code of Construction Practice [Revision G], 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** (submitted at Deadline 5), Requirement 5 of **3.1 Draft DCO [Revision G]** and the relevant SSWSI. Once the land within the Project is handed back to the owners, the Applicant will	SCC Archaeology - 5.1.4 – The LEMP will need to contain a Historic Environment Management Plan. Which will tie all aspects of the historic environment together. The submitted OLEMP needs to contain a section requiring the production of a Historic Environment Management Plan/s (HEMP), based upon the results of the completed archaeological evaluation in line with an approved AMS-OWSI. 5.22- any ecological enhancement measures will need to have appropriate archaeological assessment and evaluation to inform on the suitability of the proposed ecological enhancement for the sites chosen. SCC Archaeology have provided further details regarding this matter in the LIR.	Agreed

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		no longer have any responsibilities regarding the ongoing preservation in situ of any asset. June 2026: **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** includes for trenchless crossings, at paragraph 4.6.13: "*Where it is determined that preservation in situ is achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting, emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance*." As this is already committed to, and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** is secured through Requirement 5 of **3.1 Draft DCO [Revision G]**, the Applicant does not consider it is necessary to also update GH12. At the request of SCC Archaeology, the Applicant has added wording to GH12 in the OCoCP which will be submitted at deadline 7 to state: "drilling clay break out in areas of archaeological preservation in situ will be managed following a methodology defined in the OAMS-OWSI and DWSIs".	For EPS (Built Heritage) See 3.6.14 (Standard mitigation (Built Heritage)) for current position. June 2026 – SCC Archaeological Service The **7.2 Outline Code of Construction Practice [REP5-139]** (commitment references H01 – H08) can be considered agreed. However, there are concerns regarding appropriate archaeological considerations for GH12 in the event of a drilling break out in areas of archaeological sensitivity. We are recommending that this is covered in the OAMS-OWSI (see ID 3.6.22), as the measures for drilling clay/slurry break out in areas of archaeological sensitivity would be different to areas where there are no archaeological constraints.	
3.6.19 b	Maintenance control	The updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** submitted at Deadline 7 includes	SCC consider preservation in situ needs mechanism to record locations so maintenance activities do not cause accidental damage to archaeology.	Under discussion

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		for preservation in situ areas that the preservation in situ plan will set out protections during the operation phase of the project where relevant. The Applicant is committed to continue discussions with SCC regarding the oAMS oWSI, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
Other matters as required				
3.6.20	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys (priority and phase 2) and archaeological trial trenching (priority).	The Applicant shared overarching WSIs in March – June 2024 and December 2024. The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. The Applicant proposes this matter is agreed as the fieldwork covered by these agreed WSIs is majority complete project-wide, as set out in 3.6.7. The phase 2 archaeological trial trenching WSI is still under discussion but as this is post-examination/post-consent work this is not the subject of this matter.	The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate for the pre-consent evaluation. Pre-consent OWSI only covers priority areas, determined by construction priorities. This does not cover impacts from other aspects of the scheme, such as the Overhead sections, undergrounding of 132kV and decommissioning of existing pylons etc. NB. Given the time constraints SCCAS does not believe that NG can deliver the priority area second phase of archaeological evaluation prior to determination. As a result, this is still under discussion with NG. June 2026 – SCC Archaeological Service The Overarching WSI for geophysical survey and trial trenching of the priority areas has been approved by SCCAS. So that matter	Agreed

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			can be considered agreed. Furthermore, the Phase 2 geophysical survey WSI has been approved. Both of these matters can be considered agreed. However, the Phase 2 trial trenching OWSI has not been submitted for review and has not been approved. SCC advised in a call on 23.6.2026 that this matter can be considered agreed.	
3.6.21	Site specific Written Schemes of Investigation (WSIs) for pre-consent priority archaeological trial trenching.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project in April 2025. Updated Position (February 2026): The priority Trial Trenching is complete in SCC and therefore there are no further Site Specific WSI's to be produced for that phase of evaluation. SCC have approved all of the SS WSI's for the priority trial trenching in the county. Therefore, the Applicant proposes this matter is agreed. The position regarding the Outline AMS-OWSI is set out in 3.6.22 below.	SCCAS – The pre-consent archaeological evaluation is ongoing; we have not yet been sent WSI of all areas for pre-consent archaeological evaluation. As a result, this is still under discussion with NG. The draft AMS-OWSI was substantially incomplete when it was submitted for review and comment in April 2025. Therefore, SCCAS were unable to comment fully on this document, and we were not provided an amended version of the AMS-OWSI prior to submission. June 2026 – SCC Archaeological Service The WSI for Priority Area trial trenching has been approved. Therefore, this matter can be agreed.	Agreed
3.6.22	Outline Archaeological	The contents of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation**	SCCAS has reviewed the submitted AMS-OWSI and find that it does not establish sufficiently rigorous measures to secure	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
	Mitigation Strategy and Outline WSI	**[Revision C]** is considered appropriate and proportionate to the level of evaluation required. Comments on the draft version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** provided by the Council's archaeological advisors were considered in the updated version submitted with the DCO application. May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161**] with the intention that any further comments can be addressed and included for submission at Deadline 5. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application and which have been considered sufficient by the Planning Inspectorate and the Secretary of State to determine applications. Regarding measure for drilling clay/slurry breakout please see NG position for ID 3.6.19 a. The Applicant is committed to continue discussions with SCC regarding the oAMS oWSI, which will likely conclude after	a programme of archaeological evaluation and mitigation in the interests of the historic environment. Consequently, the current dDCO requirement (relying on the AMS-OWSI in its present form) fails to provide adequate protection for heritage assets and the AMS-OWSI must be revised in line with SCCAS comments, which will be supplied to NG. The draft AMS-OWSI was substantially incomplete when it was submitted for review and comment in April 2025. Therefore, SCCAS were unable to comment fully on this document, and we were not provided an amended version of the AMS-OWSI prior to submission. June 2026 – SCC Archaeological Service A revised version of the OAMS-OWSI **[REP5-162]** has been submitted by the applicant at Deadline 5. SCCAS will provide comments at Deadline 6. The OAMS-OWSI is not currently approved and therefore the matter is still under discussion. June 2026 – SCC Archaeological Service The **7.2 Outline Code of Construction Practice [REP5-139]** (commitment references H01 – H08) can be considered agreed. However, there are concerns regarding appropriate archaeological considerations for GH12 in the event of a drilling break out in areas of archaeological	

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		finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	sensitivity. We are recommending that this is covered in the OAMS-OWSI (see ID 3.6.22), as the measures for drilling clay/slurry break out in areas of archaeological sensitivity would be different to areas where there are no archaeological constraints.	
3.6.23	Programme for completion of archaeological evaluation	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme.', issued on the 27 June 2025 (this document has been superseded by subsequent documents submitted to PINS). A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'. The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required. The requested plan was included in the supplementary information submitted in January 2026, **6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2**	SCCAS have asked for a plan showing the areas where archaeological evaluation, geophysical survey, trial trenching, geoarchaeologcal assessment and palaeoevironmental assessment has been undertaken to date and areas where these required works are still outstanding. This has not yet been supplied. Without this the summary is incomplete and fails to provide sufficient information. The provided summary only outlines the priority areas and does not address all areas of project impact. SCCAS believes the use of the term "contingency" evaluation is inappropriate for areas where evaluation is not completed prior to determination. Any areas of the project where archaeological evaluation is not completed prior to determination, must then be included in the programme of post-consent archaeological evaluation in order to inform an appropriate mitigation strategy. SCC advised in a call on 23.6.2026 that this matter can be considered agreed.	Agreed

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		Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082] and an updated version was provided with the May 2026 update to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]** as Figure 1 of that document. The Applicant has addressed the other comment through the update issued in May 2026 to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]**. The Applicant proposes this matter is agreed.		
3.6.24	Supplementary Environmental Information	NG sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025 (this document has been superseded by subsequent documents submitted to PINS). Given the comments provided it is understood that SCC is in agreement with the part of the note that sets out the approach to supplementary information that will be provided for the DCO examination. See responses above to various matters above. The Applicant proposes this matter is agreed. Further archaeological fieldwork will be approved through appropriate documents with SCC.	As above, we are still waiting for the plan SCCAS requested and are unhappy with the use of the term "contingency". With regards to 3rd party infrastructure, the undergrounding of the 132kV sections would be required as facilitating works for the NSIP and therefore could represent a constraint on the delivery of the overall project. SCCAS have expressed the need for this aspect of work to be undertaken at the earliest opportunity. Furthermore, the archaeological fieldwork summary should also include provision of geoarchaeological and palaeoenvironmental assessment, which is currently outstanding and must be completed to inform appropriate mitigation strategies and the technical designs for river crossings.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			We now recognise that substantial aspects of this evaluation are unlikely to be achieved prior to determination, however, full evaluation should be undertaken at the earliest opportunity (should permission be granted) to allow appropriate mitigation to be delivered within project timescales. June 2026 – SCC Archaeological Service This document is superseded by subsequent documents. SCC advised in a call on 23.6.2026 that this matter can be considered agreed.	

3.7 Hydrology, Land Drainage and Flood Risk

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 9.2 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**.	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Action on project team to check legislation and policy documents referenced are correct. Include updates in any errata documents and provide an update to SCC.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant provided the following comments in response to the query raised on 21 October 2025: • Since the October meeting, legislation and policy document references have been reviewed. Minor updates, in particular adding reference to the National Standards for SuDS, and updates to cover cross references to the most recent publications of the National Planning Policy Framework and National Policy Statement EN-1, have been logged in the **8.1 Errata List [REP1-071].**	SCC confirmed during a call on the 9th June 2026 that this matter is now agreed.	
EIA – Approach and Methods				
3.7.2	Study area	The study area was agreed through the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B].** The Applicant provided the following comments in response to the query raised on 21 October 2025:	SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Project team to check when Suffolk data was requested with relation to historic flood events. If gap is found a technical note can be appended to the SoCG to cover this off.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		• Additional historical flooding information has been collected and reviewed. This has been reported in **8.10.2 Flood Risk Assessment Technical Note [REP2-031]** which was submitted to the examination at Deadline 2.		
3.7.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate and through subsequent thematic group meetings and technical notes.	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through subsequent thematic group meetings and technical notes. Technical notes for the following under consideration: • Works In, Over and Under Watercourses • Surface Water Management Principles • Comments received from SCC on the technical notes. SCC confirmed this is agreed following meeting discussing the Statement of Common Ground on 4 November 2025.	Agreed
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. The key parameters and assumptions presented are considered appropriate. Additional information on the key assumptions and parameters that have informed the Projects	SCC confirmed in response to draft SOCG review on 01 July 2026 that this matter is agreed.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		initial drainage designs are detailed in **8.2 Drainage Strategy [REP1-072]** which the Applicant submitted at Deadline 1 and updated at Deadline 4 **[REP4-186],** to address comments received from Suffolk County Council LLFA.		
EIA – Baseline Conditions				
3.7.6	Baseline conditions and receptors	The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. The baseline conditions and receptors presented are considered appropriate.	SCC agrees, following sight of the ES.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.7.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC agrees, following sight of the ES.	Agreed
3.7.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of **6.12 Environmental Statement Chapter 12 -**	SCC agrees, following sight of the ES.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Hydrology Land Drainage and Flood Risk [Revision B] and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
3.7.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 12.6 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC agrees, following sight of the ES.	Agreed
EIA – Assessment Conclusions				
3.7.10	Construction effects	The assessment of effects during construction is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B]**. The assessment of effects during construction presented is considered appropriate. Further detail with regard to managing construction effects on surface water runoff and land drainage is provided in **8.2 Drainage Strategy [REP4-186]** which the Applicant updated at Deadline 4 to address comments received from Suffolk County Council LLFA.	SCC confirmed this matter is still under discussion following their review of the Statement of Common Ground on 21 October 2025. Further internal discussion is required before matter can be moved forward. SCC confirmed during a call on 9.6.2026 that this matter is now agreed.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.7.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 12.7 of **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate. Further detail with regard to managing effects on surface water runoff and land drainage during operation of the Project is provided in **8.2 Drainage Strategy [REP4-186]** which the Applicant updated at Deadline 4 to address comments received from Suffolk County Council LLFA.	SCC confirmed this matter is still under discussion following their review of the Statement of Common Ground on 21 October 2025. Further internal discussion is required before matter can be moved forward. SCC confirmed during a call on 9.6.2026 that this matter is now agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP (including Flood Warning and Evacuation Plan)	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction mitigation measures specified in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk** of **[Revision B]** and is appropriate for managing construction impacts from the Project. The Applicant received further comments from the Suffolk Joint Emergency Planning Unit on 22 June 2026. These comments are being addressed in an update to **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [Revision C]**, which will be submitted at Deadline 7. The Applicant therefore considers this matter can be moved to Agreed.	Suffolk Joint Emergency Planning Unit provided comments on 6 November 2025. SCC confirmed that subject to the updates being made to the **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [REP5-147]** at Deadline 7, this matter can be agreed.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Other matters as required				
3.7.13	Flood Risk Assessment (FRA)	The scope, methodology, assessment and conclusions drawn in **7.9 Flood Risk Assessment [APP-331]** are considered appropriate and proportionate. The Applicant provided the following comments in response to the query raised on 21 October 2025: • Since the October meeting, additional historical flooding information has been collected and reviewed. This is reported in **8.10.2 Flood Risk Assessment Technical Note [REP2-031]** which was submitted to the examination at Deadline 2.	Comments were issued by SCC on the 22 January 2025 relating to foul water flooding and updated national flood maps. SCC provided the following comments on their review of the Statement of Common Ground dated 21 October 2025: • Project team to do a sense check and let the Council know regarding the historic mapping. This can then be mapped up as a shapefile. SCC would like to see an updated FRA to ensure historic flood events are covered off. SCC confirmed during a call on 9.6.2026 that this matter is now agreed.	Agreed

3.8 Landscape and Visual

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual Impact Assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 13.2 of **6.13**	The new duty under Section 85 of the Countryside and Rights of Way Act 2000 is not mentioned in the main Chapter 13 of the **ES [APP-226]**, but is acknowledged in **Appendix 13.5 National Landscape Assessment Study [APP-235]** and dealt with in detail in document **5.10**	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Environmental Statement Chapter 13 - Landscape and Visual [Revision B]. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment. The duty to 'seek to further the purposes' under Section 85 of the Countryside and Rights of Way Act 2000 is referenced in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [Revision B]**. Further detail is provided in **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.	**National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) (Final Issue A) [APP-120].** SCC defers to the National Landscape Partnership and Natural England (as the government's statutory advisor) on this matter. SCC supports the National Landscape in their section 85 "furthering the purposes" measures proposal. SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review. SCC confirmed this matter is agreed during call on 2.6.2026.	
EIA – Approach and Methods				
3.8.2	Study area	The Landscape and Visual study area is set out in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** A 2 km buffer was applied to the 132 kV overhead line removal and this is absorbed within the 3 km LVIA Study Area buffer from the proposed 400 kV overhead line and underground cable. For the purposes of the assessment a single 3 km Study Area was presented. The rationale for the LVIA Study Area is summarised in Table 13.2 in **6.13**	SCC (Landscape) broadly agrees with the Applicant's rationale for the LVIA study area presented in Table 13.2 (ES Chapter 13, Landscape and Visual). SCC is concerned that any works to the 132kV network have not been given their own study area in Figure 13.7 but sit within the study area for the scheme, meaning the route alignment of the proposed 400kV line is the centre of the study area throughout. SCC considers that the 132vV works need to be treated as part of the scheme for the purpose of establishing	Agreed

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		Environmental Statement Chapter 13 - Landscape and Visual [Revision B].	the study area. This would have increased the study area slightly in the relevant areas. SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review. SCC confirmed that this matter can be Agreed during a call held on 16 June 2026.	
3.8.3	Data sources	Sufficient desktop and survey data (excluding viewpoints) has been collected to inform the assessment as presented within Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The Waveney Valley Valued Landscape Assessment (Alison Farmer, 2024) (specifically Evaluation Areas EA1 and EA2) was one of the sources which informed the LVIA baseline. Reference to consideration of this report is included in paragraph 13.4.2 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** Although the study was not quoted directly in the narrative the evidence below illustrates some examples of key landscape characteristics and sensitivities identified in both the Alison Farmer study and the LVIA. These are within the 3 km LVIA Study Area (noting that EA1 and EA2 are larger areas which extend beyond the LVIA Study Area). This clearly demonstrates that the Waveney Valley Valued Landscape Assessment has informed the LVIA.	SCC (Landscape) welcomes that for the ES the 'Valued Landscape Assessment, Waveney Valley', dated April 2024, has been included in the baseline data sources and bibliography. However, no further reference or acknowledgement to this document seems to have been made in the LVIA. The findings have not been reflected upon. Therefore, there is no evidence that the Waveney Valley Valued Landscape Assessment has informed or influenced the LVIA. The assessment of landscape and visual effects on this sensitive landscape resulting from the construction of an overhead powerline in ES Chapter 13 remains high-level and does not sufficiently convey the adverse impacts and effects of the scheme. SCC confirmed in meeting regarding the Statement of Common Ground on 27 January 2026 that this requires further review. SCC has considered the Applicants updated position and does not consider that this is	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The below examples were taken from the assessment of landscape value for LCA A5 Waveney Rural River Valley set out on pages A13 and A14 of Annex A of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B]** • Natural Heritage – references to 'woodland and coastal and floodplain grazing marsh' and Roydon Fen being a 'spring-fed fen with deep peat soil' • Cultural Heritage – reference to 'Grade I listed Churches' and 'utilising reeds, sedge, furze, hemp and flax in cottage industries' • Landscape Condition – reference to 'condition of the landscape is mixed due to settlement expansion and infrastructure' and 'The wetlands on the valley floor form remnants of a much more extensive area' • Associations – reference to 'Richard Mabeys book Nature Cure' • Recreational – reference to PRoW, Common Land / Open Access Land and 'walking trails along boardwalks' • Perceptual (scenic) – reference to 'The River Waveney itself has little visual influence' • Perceptual (Wildness and tranquillity) – reference to the landscape being 'peaceful and tranquil', and tranquillity being reduced 'along main roads'	sufficient.	

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		Functional – reference to the area being 'important for carbon sequestration, an important carbon sink and for floodwater storage'The Applicant does not agree that the LVIA fails to have regard to the Waveney Valley Valued Landscape Assessment or that the assessment is high-level or insufficient. The LVIA is underpinned by a comprehensive and proportionate evidence base, within which the Waveney Valley Valued Landscape Assessment forms one of a number of relevant sources informing the baseline and sensitivity findings. While not directly quoted, its key characteristics and sensitivities are clearly reflected and embedded within the assessment, as demonstrated through the alignment of findings. Concerns raised by SCC regarding the level of detail within **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** are not related to this data sources matter. The level of detail presented is appropriate and consistent with established guidance for projects of this scale, and is supported by extensive technical appendices which provide the necessary depth and transparency. The Applicant therefore considers that the assessment provides a robust and reliable evaluation of landscape and visual effects, with no material gaps in evidence or analysis, and does not accept that further review is warranted.		

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.4	Assessment methodology (LVIA methodology)	The assessment methodology is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]**. The removal of existing 132 kV overhead lines is considered in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The Applicant has clarified the approach to identifying landscape value in Table 4.20, ID 13.93 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, explaining that this is in line with the Landscape Institute's TGN 02/21 Assessing Landscape Value Outside National Designations. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Email from SCC dated 5 Nov 2024 – Landscape consultants have not assessed the approach to rationalisation of the 132kV network. No agreement was reached in the meeting held on the 25 September 2024, with regards to the necessity of a Valued Landscape Assessment for the study area. (Local authority representatives were in favour). SCC considered that the proposal by National Grid to consider valued landscape qualities in the LVIA, may be sufficient, provided that this is based on the actual local landscape character areas the scheme would affect, rather than the landscape character types on which the identification of character areas would be based on and defined against. This has not been taken on board by the Applicant. This matter is unlikely to be agreed.	Not Agreed
3.8.5	Assessment methodology (Viewpoints)	The Landscape and Visual Impact Assessment is supported by visualisations and an assessment of effects at 206 viewpoints, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [Revision B]**. Visualisations are provided in **7.12 Visualisations [APP-343 to APP-351]**.	SCC notes that, within Suffolk, there appear to be only two viewpoints outside the 3km study area (VP3.20 and VP3.29) and that none were considered at the greater distance of up to 5 km from the scheme. SCC considers that there is potential for significant visual effects beyond the 3 km study area, for example where there are particularly	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The following viewpoints are located within Suffolk and are beyond 3 km from the nearest proposed above ground structure (approximate distance provided in brackets): • Viewpoint 3.20 Fenbridge Lane (4.2 km) – see PDF pages 132 to 134 of APP-230 • Viewpoint 3.24 Higham Hill, south of Lower Raydon (4.2 km) – see PDF pages 144 to 146 of APP-230 • Viewpoint 3.26 Essex Way, near Langham Hall (3.7 km) – see PDF pages 149 to 150 of APP-230 • Viewpoint 3.27 B1066 Park Road, near Thorington Street (4.8 km) – see PDF pages 151 to 153 of APP-230 No significant effects were identified at these viewpoints as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment – Part 2 of 4 [APP-230]**. Further to this no significant effects were identified for viewpoints beyond approximately 2 km within Suffolk. The methodology set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]** provides the justification for the 3 km Study Area. This was determined by the nature and scale of the Project and the nature of the surrounding area and considers the	sensitive visual receptors, for example within the National Landscape, and where topography allows more far-reaching views. The additional viewpoints pointed out be Applicant (3.24, 3.26 and 3.27) are removed more than 3km from the nearest structure, as they are located where undergrounding is proposed through the National Landscape. They are not beyond the 3km study area. None of these are judged to experience significant effects. SCC considers this matter has not been satisfactorily resolved.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		landscape and/or views that the Project may influence in a significant manner. The LVIA is underpinned by a comprehensive and proportionate evidence base. The Applicant therefore considers that the assessment provides a robust and reliable evaluation of landscape and visual effects, with no material gaps in evidence or analysis, and does not accept that further viewpoints are warranted as they will not change the assessment. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.6	Key parameters and assumptions	Key parameters and assumptions associated with the Landscape and Visual Impact Assessment are summarised in paragraph 13.4.20 in Section 13.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The key parameters and assumptions presented are considered appropriate. Commitments relating to vegetation reinstatement and the 3:1 tree replacement ratio for individual trees and small groups of individual trees are detailed in **7.4 Outline Landscape and Ecological Management Plan [Revision G]**.	SCC (Landscape) considers the key parameters for assessment and assumptions as summarised in Section 13.4 of Chapter 13 (Landscape and Visual), paragraph 13.4.20 of the **ES [APP 226]** broadly acceptable. SCC welcomes the commitment by the Applicant that vegetation removed during construction would be reinstated (a fundamental pre-requisite to achieving BNG), except where there are planting restrictions associated with requirements to maintain an overhead line safety clearance. SCC further welcomes the commitment that trees that cannot be replaced in certain areas will be replaced elsewhere (SCC requests that is carried out as near to the place of removal as possible). SCC welcomes the Applicant's commitment to replace individual trees and trees within	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
			groups at a ratio of 3 replacement trees for each tree lost. SCC confirmed that this matter can be Agreed during a call held on 16 June 2026.	
EIA – Baseline Conditions				
3.8.7	Baseline conditions and receptors	The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The baseline conditions and receptors presented are considered appropriate. **Use of Landscape Character Types (LCT)**: the landscape assessment in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B]** is based on available landscape character assessment data. Within Suffolk this comprises the Suffolk Landscape Character Assessment (2010) which identifies LCTs only. The Suffolk LCTs were reviewed and were considered by the Applicant to form a suitable baseline against which to undertake the assessment. The assessment makes reference to specific geographical areas within the LVIA Study Area. The Applicant considers that there would be no change to the findings of the assessment if a local landscape character assessment had been undertaken. **Use of Visual Receptor Areas (VRA)**: the approach to the grouping of visual receptors into VRAs is set out in paragraph 13.4.48	SCC disagrees. For Suffolk, the **Landscape Baseline and Assessment [APP-228]** is based on landscape character types rather than defined geographical areas within these types. SCC (Landscape) considers that the accuracy of the landscape assessment suffers as a result, in particular where the same landscape type appears in different locations (for example LCT: Rolling Valley Farmlands and Furze, LCT: Ancient Plateau Claylands). The descriptions of the changes in the landscape remain vague (e.g. paragraph 13.3.231: '...including the losses of some hedges and hedgerow trees...') The effects that the scheme will have on the local landscape character of the varying areas do not appear to be discussed. SCC (Landscape) does not fully agree with grouping of key visual Receptors and Visual Receptor Areas. Road users on recognised tourist routes should not be in the same category as other road users (although there appears to be	Not Agreed

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		of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]**. The assessment of effects within VRAs is supplemented by an assessment of effects at 206 viewpoint locations. The Applicant considers that this approach is robust and in line with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). **Sensitivity of Road Users:** the sensitivity of visual receptors is set out in paragraphs 13.4.49 to 13.4.56 of **Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [Revision B]**. • People travelling in vehicles on scenic routes and tourist routes, where attention is focused on the surrounding landscape, but is transitory are of medium susceptibility • People travelling more rapidly on more major roads, rail or transport routes (not recognised as scenic routes) are of low susceptibility **People at Work:** paragraph 13.2.38 of **Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [Revision B]** states that '*People at work are generally held to be of lower sensitivity to changes in their view and are not considered further in this assessment*.' The assessment of effects on visual receptors within VRAs and at viewpoints focuses on the most sensitive receptors (i.e. residential or recreational receptors), although people at work	some differentiation within the area assessments, which is welcome). SCC notes that the visual receptors at their place of work have now been included (paragraph 13.2.36) **[APP- 229]**. However, no further reference appears to have been made in the VRA assessments, they are not even considered in the recurring heading: *Community, Recreation and Road Users Within the VRA.* It appears that there is no figure to illustrate the extent of the Visual Receptor Areas. SCC (landscape) has provided details in the LIR **[REP1-178].**	

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		within the study area would experience views of a similar nature to those described in the LVIA. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.8	Embedded mitigation	Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]** and also paragraphs 13.6.2 to 13.6.4 in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. Planting within Environmental Areas around substations and CSE compounds is considered to be embedded mitigation. Embedded mitigation is considered appropriate in terms of its nature and scale, to address potential effects. Compensation is not considered under this matter, please refer to ID 3.8.11 below. The Applicant disagrees with the characterisation of the level of acceptance of change requests. Many change requests may seem reasonable to the originator, but if they are not within the scope of relevant policy, regulatory and financial context then they cannot be progressed. Likewise, if the change simply transfers effects to other receptors or constrained areas, then very careful thought needs to be given to the merits of change.	Adequacy of undergrounding, mitigation and lack of compensation are all still under discussion. SCC also notes that the majority of change requests have not been adopted or considered.	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Where requests are reasonable the Applicant has endeavoured to seek to accommodate these to some degree. In this context changes have been made to alignment, pylon position or temporary works over more than half the route of the Project. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.8.9	Standard mitigation	Standard mitigation measures comprise management activities and techniques which would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance. Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B] and the Outline Code of Construction Practice [Revision G].** The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. It is not considered reasonable or possible for standard mitigation measures to address all significant temporary impacts of 400 kV infrastructure during construction. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Standard mitigation measures as described at paragraph 13.6.5 of **Chapter 13 [APP-226]** do not refer to landscape and visual mitigation, but to management activities and techniques employed during construction. While these measures are welcome, the current proposals do not address the substantial significant negative residual impacts/effects in landscape and visual terms.	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.8.10	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures is presented in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The Applicant's position on landscape mitigation is set out in Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC (Landscape) disagrees with the term 'additional', and also with the definition that these are measures that go 'above and beyond'. (paragraph 13.6.8, **ES Chapter 13 [APP-,226]**). None of the mentioned forms of mitigation refer to mitigative planting to reduce the visual and landscape effects, separate from reinstatement planting, planting around CSE compounds and BNG requirements. SCC considers that such planting must be considered in its own right.	Not Agreed
3.8.11	Compensation	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** confirms off-site provision for tree replacement in connection with the 3:1 commitment may be required; where this is the case, this is considered to be compensation. Onsite and offsite tree planting associated with the 3:1 commitment will be secured through a requirement of the draft DCO with onsite details provided within the Reinstatement Planting Plans and offsite details provided in the Offsite Planting Delivery Scheme. The Applicant is engaging with the local authorities in relation to the differences in the wording in the requirement compared to their draft s106. Landscape compensation measures are considered in relation to the mitigation hierarchy but there is no requirement under policy	Compensation was not been addressed in the PEIR, the Applicant proposed to deal with this separately as part of the DCO process (PEIR, para. 15.5.14). SCC supported BSMDC in their statement: *"Where undergrounding isn't proposed, explanation is needed as to why compensation isn't being offered instead, except at substations and sealing end compounds, when the PEIR states that significant landscape and visual impacts will occur along the length of the project."* During the examination, SCC recognises progress that the Applicant was made in this regard (as below). However, the Council considers that these measures could go further to address the changing sense of	Not Agreed

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		to compensate for all residual effects. The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then falls to the planning balance. The Applicant's position on compensation is set out most recently in Section 5.1a of **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**. Notwithstanding this position, Action Point 27 identified in **Action Points from Issue Specific Hearing 2 (ISH 2) [EV9-023]** stated – '*ExQ1 LV 1.28 and masterplans - Masterplans to be provided at the next deadline, with an agreed position in terms of compensation measures for residual effects on the specified landscapes by deadline 5 (Wednesday 10 June).*' The Applicant engaged with Local Authorities and submitted **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** at Deadline 5. This document **[REP5-199]** contains plans which set out the constraints and potential indicative opportunities relating to topics of interest at certain locations, as set out in ExQ1 LV 1.28. The Applicant's position on compensation and the status of these plans is also set out in Section 2.5 of **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]**. The Applicant is however engaging with the LPAs on a mechanism to secure funding for compensation	place that the proposed development will cause to the landscape. Landscape and visual compensation cannot resolve all residual impacts, however, it should seek to offset and provide betterment for the benefit of the locality which hosts the infrastructure. SCC considers that the Applicant's proposed compensation measures do not adequately provide this reassurance that all that can reasonably and proportionately be delivered has been offered. SCC welcomes the commitment by the Applicant to replace individual trees and trees within groups at a ratio of 3:1 (Table 13.1 **[APP-226]**) and acknowledges the probability that not all of these trees can be planted within the DCO limits. It must be remembered, however, that these trees are fundamentally compensatory replacement planting. On their own, these trees will not be capable to offset the residual harm to landscape character and visual amenity resulting from this project. Any such off-set would be incidental. Further, SCC has promoted that a Landscape Enhancement Scheme, comparable to those for National Parks and National Landscapes under the Visual Impact Provision (VIP) funded by Ofgem, is required to partially compensate for the construction, operation and maintenance impacts on landscape and visual amenity resulting from this project. In certain locations, the Applicant has	

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		measures should they be considered necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	submitted masterplans **[REP5-199]** in response to Action Point 27 of ISH2. SCC welcomes these as a starting basis for discussion and has provided commentary in its Comments on D5 Submission **[REP6-167]** and its Post-Hearing Subsmission for ISH3/4 **[REP6-166]**.	
EIA – Assessment Conclusions				
3.8.12	Construction effects	The assessment of effects during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The assessment of effects during construction presented is considered appropriate. The LVIA considers the contribution of heritage assets within judgements related to landscape and visual value rather than assigning judgements of value of the assets themselves. The Applicant notes that Historic Environment matters are considered in Table 3.6 and therefore concerns related to this matter are not directly relevant to ID 3.8.12. The value assessed for all heritage assets follows the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [Revision D]**. Assessments of value are described in **6.11.A1 Appendix 11.1 Historic Environment Baseline Report [Revision C]**, which contains baseline descriptions and setting assessment	SCC welcomes the information provided within the **Arboricultural Impact Assessment [APP-236]**, the **Hedgerows Regulations Report [APP-161]** and the Trees and Hedgerows to be Removed and or **Managed Plans [APP- 048- APP-055]** and has provided comments on these in the **LIR [REP1-178]**. SCC (Landscape) considers that the assessment of effects on landscape character and visual amenity in the **LVIA [APP-226]** fails to adequately recognise the project's impacts on the landscape and visual receptors. This is illustrated, to give one example, in the assessment provided for Mellis Common, the significance of which is not recognised in the LVIA. In the **Historic Environment Baseline Report [APP-209]** it is not clear how the medium value given to the conservation area is arrived at. SCC confirmed this matter is Not agreed during call on 2.6.2026.	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The Applicant does not accept SCC's position that the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** fails to adequately recognise the Project's impacts on the landscape and visual receptors. The assessment of construction effects is appropriate and consistent with established guidance for projects of this scale, and is supported by extensive technical appendices which provide the necessary depth and transparency. The Applicant therefore considers that the assessment provides a robust and reliable evaluation of landscape and visual construction effects The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Please also see my earlier comments with regards to the landscape visual baselines.	
3.8.12a	Lighting and night-time working during construction and operation	**7.2 Outline Code of Construction Practice [Revision G]** lists the activities that may take place outside of the identified core working hours, including at night-time. Commitments relating to lighting are contained within **7.2 Outline Code of Construction Practice [Revision G]** as outlined below: • B06 – includes 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.	SCC considers that lighting must be kept to a minimum, and that wildlife and residential amenity must be protected. The chosen luminaires should be of the warmest tone (i.e. the lowest Kelvin level) achieving the required illumination. While SCC understands that the Applicant is willing to commit (and did so verbally on a call on 8 July 2026) to low Kelvin lighting, to date parameters for the wavelength of lighting, luminaires and Kelvin levels have not been secured in the oCoCP. While accepting the rationale behind the potential necessity for night-time working, SCC considers that detailed justifications	Under discussion

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		• GG17 - activities or equipment that may cause nuisance (including lighting) will be located away from sensitive receptors (e.g. residential properties, ecological sites) where reasonably practicable. • GG26 - construction lighting of the lowest luminosity to safely perform each task and include motion sensors to 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 • LV03 – Construction lighting will be directional and minimised. The Applicant will also consider updating the wording of GG26 and LV03 to address SCC's concerns for Deadline 7. The Applicant is committed to continue discussions with SCC with regards to construction lighting, which will be ongoing recognising the request relates to detailed design. The Applicant is committed to minimising the effect of construction lighting, as secured by commitments GG26 and B06 in **7.2 Outline Code of Construction Practice**	and programmes need to be provided for each location at detailed design stage and that nighttime working must be kept to an absolute minimum. SCC considers that this is required in addition to the ecological lighting commitments, for the benefits and mental health of local residents. SCC would welcome, if LV03 was to include a commitment on how any complaints and aggrievances by local residents would be addressed and resolved. SCC would expect to see further commitment in GG30 for local communities to raise concerns regarding experienced light and noise levels, and be assured that reasonable, sufficient, and timely follow-up actions will be undertaken to remediate these concerns.	

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		[Revision G]. On this basis this matter is retained as Under Discussion. As set out in paragraph 4.9.10 of **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]**, operational lighting is not required at Cable Sealing End (CSE) compounds. Task lighting may be required when undertaking specific maintenance activities. Commitments related to task lighting are included in GG26. The Applicant has considered feedback from SCC and updated operational lighting requirements for the proposed new and extended substations, these are set out in Section 5.2 of **7.16 Design Approach for Site Specific Infrastructure (DASSI) [REP6-092].** An Operational Lighting Management Strategy is also included in Appendix B of the DASSI. This explains that operational lighting at the EACN Substation will have regard to the Dedham Vale National Landscape & Coast & Heaths National Landscape Lighting Design Guide, Guidance to reduce light pollution and protect our dark skies (Darkscape Consulting, 2023).		
3.8.13	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B].** The assessment of effects during operation (and maintenance) presented is considered appropriate and consistent with established	The response by the Applicant in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, under ID 13.148 does not resolve the issue. SCC (Landscape) still considers that the assessment of effects could be compromised/played down by the baseline	Not agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		guidance for projects of this scale. It is supported by extensive technical appendices which provide the necessary depth and transparency. The Applicant therefore considers that the assessment provides a robust and reliable evaluation of landscape and visual effects. The Applicant has provided a response to the 'accumulation of non-significant effects' point in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, under ID 13.148.The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	presentation and has set out these concerns in the LIR [REP1-178], in particular with regards to the character and value of Suffolk's landscapes affected by the proposals. Within an LVIA, the sole focus on landscape and visual receptors which would potentially experience significant effects does not account for the fact that an accumulation of non-significant effects can in itself be significant. The landscape and visual adverse effects resulting from the scheme do not fall away below the significance threshold, they are merely adverse to a lesser degree, over a wide area. SCC confirmed this matter is Not agreed during call on 2.6.2026.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.14	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate for managing construction impacts from the Project. Information on the use of the term 'where practicable' is provided in the response to ExQ1 SET 1.5 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074].** This includes identification of where the use of	SCC has provided detailed comments on the **Outline CoCP** in the **LIR [REP1-178]**. The comments provided in Section 13 of the LIR still stand. SCC broadly welcomes the additional commitment regarding an Ecology Working Group and the additional Ecology and Biodiversity commitments as far as they refer to Suffolk, although SCC considers that they are too weak/contain too many caveats ('where practicable').	Not agreed

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		'where practical' has been removed from **7.2 Outline Code of Construction Practice [Revision G]**. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC confirmed this matter is Not agreed during call on 2.6.2026.	
3.8.15	Outline LEMP	**7.4 Outline Landscape and Ecological Management Plan [Revision G]** includes all relevant operational related mitigation measures specified in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]** and is appropriate. **7.3 Outline Construction Traffic Management Plan [Revision E]** has been updated to include consideration of traffic management to enable the retention of mature trees and mature hedgerows, as far as possible, where there are conflicts with a temporary visibility splay.**7.4 Outline Landscape and Ecological Management Plan [Revision G]** and **7.2 Outline Code of Construction Practice [Revision G]** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable as tree canopy lifting may be achievable and meet with Highways approval. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of construction as set out under Section 7.6 of **7.4 Outline Landscape**	Detailed comments on the submission version of the oLEMP were provided in the **LIR [REP1-178]**. Refer to 3.8.9 for the SCC's position on additional landscape mitigation. Refer to 3.8.10 for the SCC's position on landscape compensation. With regards to minimisation of tree losses, SCC considers that a commitment should be included into the oCoCP and other relevant documents, such as the oLEMP and oCTMP, that, where mature trees conflict with a temporary visibility splay, the first default approach is to apply all reasonable forms of traffic management, including temporary traffic lights and low speed limits, to enable the retention of the tree(s). SCC welcomes the Applicant's strengthened commitment in paragraph 5.8.15 of the oCTMP. SCC has provided detailed comments and guidance on hedgerows in its **LIR [REP1-178]**, which do not appear to be reflected in Section 7.6 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030].**	Under discussion

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		and Ecological Management Plan [Revision G]. Tree protection measures are set out in Section 7.3 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]** which also references the preparation of a Tree Protection Plan that will be part of the Arboricultural Method Statement to be produced by the Main Works Contractor. Aftercare is set out in Section 10 of **7.4 Outline Landscape and Ecological Management Plan [Revision G]**. Consideration of BNG proposals is outside the remit of landscape and visual matters and is included under ID 3.3.17 and 3.3.18. The Applicant's approach however to replacement planting and justification for its inclusion within the BNG metric has been set out in paragraphs 3.5.2 to 3.5.7 of **7.1 Biodiversity Net Gain Report [Revision B]**. In April 2026 the 'Summary of responses and government response' was published following the consultation on the implementation of BNG for NSIPs consultation. The Government's response confirmed that '*reinstatement of existing habitats (replacing a temporary loss of habitat with the same habitat type and conditions) is considered non-significant and does not need to be secured. This approach is intended to create more certainty on what is considered significant and resolves the issue set out above on land being returned to its previous owner and use*'. The Applicant's	SCC broadly agrees with the tree protection measures proposed in Section 7.3 of **7.4 Outline Landscape and Ecological Management Plan [REP3-030]**. SCC considers that the Tree Protection Plans need to be shared and agreed with the relevant discharging local authority. SCC has provided detailed comments on Aftercare in its **LIR [REP1-178].** SCC does further not agree with the additional wording in 10.1.1 and is of the view that any planting that is to be counted as part of the BNG should be maintained for 30 years, rather than 5. SCC considers that the outline landscape proposals for mitigative planting at Environmental Areas and CSE compounds should be further developed during the examination, in light of comments by Interested Parties, such as the local authorities to secure acceptable planting schemes. SCC is particularly concerned with regards to planting along the western boundary of Wenham CSEC (see Viewpoint 3.25: PRoW near Woodlands Hall (Raydon 5)). During a call with the Applicant on 8th July 2026, landscape proposals for the Wenham Grove CSE Compound were discussed, and it was agreed that amended proposals, which address SCC's concerns with regard to landscaping, would be submitted at D7.	

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		approach is therefore supported by the approach that will be taken to BNG for NSIPs when it becomes mandatory in November 2026. Landscape proposals within Environmental Areas are indicative and will be finalised at the detailed design stage of the Project and included within the final LEMP approved by the relevant local planning authorities. However, the Applicant is reviewing the Environmental Area at Wenham Grove with a view to discussing this further with SCC. It is anticipated that an updated plan will be submitted by Deadline 7.	SCC does not agree that to the proposed Landscape and Ecology Working Group terms of reference as drafted in the OLEMP. Whilst these may be acceptable, SCC has worked with the other Host Local Authorities and the Suffolk Wildlife Trust to promote agreeable and enforceable terms of reference based on the Council's prior experience. Further, SCC does not agree to the aftercare period for BNG/Trees (i.e. returning the landowner after 5 years without further monitoring and maintenance assurances), this is insufficient to secure these commitments and requires a greater period prior to handover.	
Other matters as required				
3.8.16	Landscape compensation at Waveney Valley, Gipping Valley and Bramford Substation – Action Point 27	At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in a number of documents including **5.1 Consultation Report [APP-066]** and **5.15**	SCC welcomes the indicative Masterplans **[REP5-199]** provided by the Applicant at D5 for the Waveney Valley, Gipping Valley and around Bramford SCC considers that that landscape scale compensation is required in these locations and the provided masterplans provide a useful basis for further engagement. SCC's position has been further elaborated in **Answers to the Second Round of Examining Authority's Questions [REP5-271]** in GEN 2.2, and SCC's Comments on D5 Submission **[REP6-167]**, and Post-Hearing Submission for ISH3/4 **[REP6-166]**.	Agreed

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		Design Development Report [APP-122], with feedback helping shape the Project. Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals for rationalisation and undergrounding of several sections of existing 132 kV overhead line together with careful consideration of the routeing of the proposed 132kV underground cables and 400 kV overhead line into and out of the substation. The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. An assessment of Cumulative Effects has been undertaken in accordance with **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]** and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. This includes an assessment of cumulative landscape and visual effects around Bramford Substation including the Bramford to Twinstead Project. Significant cumulative landscape and visual effects are recognised. The Applicant has had ongoing discussions with SCC in relation to Action Point 27 set by the ExA and identified in Action Points from Issue Specific Hearing 2 (ISH 2) **[EV9-023]** which stated – '*ExQ1 LV 1.28 and masterplans - Masterplans to be provided at the next*		

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		deadline, with an agreed position in terms of compensation measures for residual effects on the specified landscapes by deadline 5 (Wednesday 10 June).' In direct response to Action Point 27 the Applicant engaged with Local Authorities including SCC and submitted **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** at Deadline 5. This document **[REP5-199]** contained plans which set out the constraints and potential indicative opportunities relating to topics of interest at certain locations as set out in ExQ1 LV 1.28 which included Waveney Valley, Gipping Valley and Bramford. The Applicant's position on compensation and the status of the plans is in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** is set out in 3.2.14.		

3.9 Socio-economics, Recreation and Tourism

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socioeconomics, Recreation and Tourism	SCC acknowledge the identification and consideration of relevant legislation, policy, and guidance within Chapter 2	Not agreed

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		assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 15.2 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. In regard to the new Socio-economic Effects of NSIPs Supplementary Guidance Document developed by SCC, this document was published following **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]**. As such, it does not form part of the guidance of the ES assessment. It is understood that the SGD requires the identification of 1) workforce requirements and impacts; 2) geography of the supply chain; 3) skills and workforce effects during construction, operation and decommissioning; 4) supply chain effects during construction, operation and decommissioning; 5) socioeconomic impacts and opportunities. The ES chapter has identified the requirements stated above, except for the geography of the supply chain due to the current stage of the design; socio-economic effects during operation and decommissioning as agreed in **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]**; and training	and Section 15.2 of the ES. SCC expects ongoing review to reflect any updates in national or local policy and seeks assurances that the policy framework aligns with best practices. While SCC recognises that its Supplementary Guidance on the Socio-Economic Effects of NSIPs was published following the Scoping Opinion, this does not negate its relevance as an expression of the current local policy position and good practice for assessing workforce, skills and supply-chain impacts arising from NSIPs in Suffolk. SCC therefore does not accept the Applicant's position that the Supplementary Guidance can be discounted on the basis of timing, and expects the assessment and any forthcoming mitigation to align with its principles. Whilst the ES identifies certain high-level workforce requirements and distinguishes between direct and indirect effects, it does not provide the detailed, phase-specific workforce modelling, scenario analysis or geographic assessment of skills demand required to understand local labour market capacity or cumulative NSIP pressures, nor does it assess skills and training implications on the basis that these sit "beyond the EIA". SCC does not agree with this approach. Skills and workforce impacts are integral to the socio-economic effects of construction	

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		opportunities as this element sits beyond the EIA. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** assessed direct impact (i.e. construction workforce) and indirect impact (i.e. supply chain) – however, material supply and demand would vary significantly, and it is not possible to specify sources at the time of submission of the DCO application as stated in Paragraph 15.7.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** during construction. Operational impacts have been scoped out in accordance with **6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297]**. The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. The Applicant has submitted **8.13 Outline Employment and Skills Plan [REP5-215]** into the Examination at Deadline 5. The matrix presented in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**	and must be considered in order to determine the need for mitigation. SCC also notes the Applicant's reliance on non-statutory community benefit mechanisms to address skills and employment outcomes. These do not constitute mitigation, are not secured through the DCO and cannot be relied upon where they inform conclusions of effect significance. In relation to methodology, SCC notes the Applicant's use of a five-level significance matrix but considers that this methodological difference does not address the underlying deficiencies in evidence or alter SCC's position on the adequacy of the assessment. For these reasons, SCC maintains that the ES does not fully accord with SCC policy or established examination practice and that further work is required, including consideration of SCC's Supplementary Guidance, provision of robust workforce and skills evidence, and the securing of appropriate mitigation, such as a DCO-secured Skills and Employment Plan, before agreement can be reached. SCC considers that the **8.13 Outline Employment and Skills Plan [REP5-215]** submitted at Deadline 5 is not sufficient. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	

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		comprises five levels of effect significance: High, Medium, Low, Very Low and No change. This contrasts with the three levels of High, Medium and Low, outlined in the SPD. The use of the five-level matrix in the ES enables a more nuanced assessment of potential impacts on the local economy and local employment. However, this methodological difference does not materially alter the overall conclusions of the assessment. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
EIA – Approach and Methods				
3.9.2	Study area	The Applicant confirms that West Suffolk, Norwich City Council and Ipswich Borough Council are within the Wider Study Area for the local economy, local employment and tourism economy assessment. **6.20 Scoping Opinion [APP-297]** stated: "The Applicant should seek to agree the study area with the relevant local authorities". A meeting was held on 12 September 2024 to seek to agree this point in the Scoping Opinion. The Applicant provided the following comments in response to the query raised: • The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job	During the Thematic Group Meeting (August 2023), SCC requested further expansion to the study area proposed to capture potential employment in the wider cities, towns, and settlements as a result of the Project. It is proposed by National Grid that West Suffolk, Norwich City Council and Ipswich Borough Council will be included in the wider study area. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two distinct elements. The economic study area should differentiate between unskilled/semi-skilled labour, skilled labour, and supply chain tiers, reflecting realistic commuting patterns, availability	Not agreed

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		demand of approximately 480 roles over the four year construction period. Given this, as well as the limited scope for local employment, the differentiation of study area between unskilled/semi-skilled labour, skilled labour, and supply chain tiers is deemed not to be a proportionate approach. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	of local skills, and cumulative workforce demands from concurrent infrastructure projects. SCC does not accept the Applicant's assertion that differentiation of study areas by skill level and supply-chain tier is unnecessary on the basis that construction employment is described as "modest". Even where absolute workforce numbers are lower than for other NSIPs, the nature of skills demand, commuting patterns, and interaction with concurrent infrastructure projects remain critical considerations. SCC continues to expect the Applicant to define separate and clearly articulated study areas for the construction workforce and for supply-chain effects, reflecting the materially different geographic reach and socio-economic characteristics of those elements. While SCC notes the Applicant's proposal to include West Suffolk, Norwich City Council and Ipswich Borough Council within a wider study area, SCC does not consider that this alone addresses the underlying methodological concern. Without appropriate differentiation of study areas by workforce type and supply-chain tier, SCC considers that the assessment risks under-representing potential labour market interactions, displacement effects and cumulative pressures. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	

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3.9.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. The Applicant provided the following comments in response to the query raised: • Baseline data sources are presented in various topics in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** including workforce employment (i.e. major occupational group, skills and qualifications, industrial group), supply chain impact (i.e. industrial group) and tourism impact (i.e. tourism economy). The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC does not agree that the baseline evidence is sufficiently robust or appropriately structured to support the assessment of skills, education and employment impacts. While SCC recognises that ES Chapter 15 draws on a range of published datasets covering workforce characteristics, skills and qualifications, industrial sectors, supply chain activity and tourism, the data has not been applied in a manner that clearly corresponds to the specific impacts being assessed, particularly in relation to construction workforce demand, skills capacity, cumulative labour pressures and supply chain effects. SCC considers that baseline information should be explicitly aligned to each thematic area of impact and used to inform a clear understanding of likely workforce draw, skills availability and constraints within the defined study areas. SCC also notes that no engagement has taken place with the Regional Skills Coordination Function, which SCC considers a key deficiency, as this is the primary mechanism for accessing coordinated, up-to-date intelligence on labour demand, skills pipelines and cumulative impacts arising from concurrent NSIPs. Without such engagement, SCC does not consider that the baseline adequately reflects the current or future labour market context in which the Project would be delivered.	Not agreed

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			SCC confirmed during a meeting in June 2026 that this matter is not agreed.	
3.9.4	Assessment methodology	**6.20 Scoping Opinion [APP-297]** stated *"The Applicant should seek to agree the study area with the relevant local authorities"* and *"The ES should detail the criteria used to identify businesses likely to be affected and the Applicant should seek to agree these with relevant local authorities". A* meeting was held on 12 September 2024 to seek to agree the points raised in the Scoping Opinion.	SCC welcomes engagement on assessment methodology but expects a structured approach that differentiates between workforce and supply chain impacts, in line with the Supplementary Guidance Document: Skills, Workforce and Supply Chain Assessment and Mitigation. The study area must be clearly defined for both elements, considering workforce mobility by skill level and contract duration, as well as supply chain reach beyond the immediate locality. SCC expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with SCC to ensure robustness and alignment with wider socio-economic modelling. SCC responded to the 3rd Technical Note in an e-mail dated 4 April 2025. The e-mail stated that SCC were in agreement with the Technical Note and had no further comments / concerns.	Agreed

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3.9.5	Key parameters and assumptions	Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. The key parameters and assumptions presented are considered appropriate.	SCC agrees that the assessment on preliminary information is iterative and should evolve accordingly. Assumptions and parameters should be reviewed alongside the methodology and approach development.	Agreed
EIA – Baseline Conditions				
3.9.6	Baseline conditions and receptors	The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. The baseline conditions and receptors presented are considered appropriate. The Applicant provided the following comments in response to the query raised: • The baseline data is presented as agreed in **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]**. Baseline data for local training providers and local businesses workforce displacement fall beyond the scope of the ES chapter. • Cumulative impacts on workforce demand and displacement from NSIPs are presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. Modelling of skills gaps falls beyond	SCC broadly agrees with the baseline conditions and receptors identified in Section 15.5 of the ES but requests greater focus on: • The capacity and responsiveness of local training providers to meet anticipated demand, ensuring alignment with existing and emerging sector requirements. • The cumulative impact of workforce demand from multiple NSIPs, with clear modelling of skills gaps, displacement risks, and potential mitigation strategies. • The resilience of local businesses to workforce displacement, including sector-specific vulnerability assessments and identification of support mechanisms to sustain local economic activity. SCC does not agree that baseline data relating to skills, training capacity, workforce displacement or skills gaps falls outside the scope of the socio-economic assessment. These matters are integral to understanding the likely effects	Not agreed

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		the scope of the cumulative assessment. Given that the assessment concluded that no significant effect is anticipated, no additional mitigation is required. • Given the nature of the Project, the majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines from approved contractors. These are typically sourced from the Applicant's existing pool of approved contractors, with a relatively low number of jobs requiring local workers. Therefore, the Project is not anticipated to directly generate local business workforce displacement. In addition to the local job creation, the Project is anticipated to create an induced beneficial impact on the local economy in terms of the construction workforce spending. Therefore, a support mechanism as a mitigation is not considered to be required. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	of the construction workforce on the local and regional labour market and are necessary to determine whether mitigation is required. The omission of this information limits the ability of the assessment to evidence its conclusions, particularly where those conclusions rely on findings of no significant effect. SCC further does not agree that cumulative workforce impacts can be sufficiently addressed through Chapter 17 alone, or that modelling of skills gaps and displacement risks can be excluded from cumulative assessment. In the context of multiple concurrent NSIPs, cumulative workforce demand is a core socio-economic consideration that directly affects labour availability, training pipelines and local business resilience and therefore needs to be assessed in a clear and explicit manner. SCC also does not accept the Applicant's position that reliance on specialist contractors negates the need to consider local skills capacity or displacement effects. Even where construction activity requires highly specialised labour, demand will continue to interact with the regional labour market and training system, particularly where multiple large infrastructure projects are progressing in overlapping timeframes. As such, conclusions that no significant effect or no mitigation is required are not	

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			supported by sufficiently robust evidence at this stage.	
EIA – Embedded, Standard and Additional Mitigation Measures				
3.9.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C].** Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided the following comments in response to the query raised: • Mitigation measures proposed are set out in paragraph 15.6.5 to 15.6.11 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. • With regards to embedded mitigation for workforce scale, skills demand, cumulative labour pressures, or displacement risks, given that no adverse effects have been identified on local economy, local employment or tourism economy, no mitigation is required. However, the Applicant has submitted **8.13 Outline Employment and Skills Plan [REP5-215]** at Deadline 5. This document is intended to provide transparency and clarity	Weak response on embedded measures relating to socio-economic, recreation and tourism. Suggest this needs to be revisited by developer as it currently only considers environmental measures such as routing and temporary works. SCC seeks clearer commitments to ensure that mitigation is proactive and responsive to cumulative socio-economic impacts arising from multiple NSIP projects. SCC does not agree with the Applicant's conclusion that the embedded mitigation measures identified in Section 15.6 of the Environmental Statement are appropriate or adequate to address socio-economic effects. While SCC acknowledges that paragraphs 15.6.5 to 15.6.11 describe certain embedded measures, these are largely focused on environmental and construction management considerations and do not amount to embedded mitigation for skills, education, employment, or wider socio-economic impacts. SCC considers that embedded mitigation for socio-economic effects should clearly demonstrate how anticipated workforce demand, skills pressures, and local	Not agreed

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		regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. • With regards to certainty of mitigation measures, given that no adverse effects have been identified on local economy, local employment or tourism economy, no mitigation is required. A final version of the **8.13 Outline Employment and Skills Plan [REP5-215]** submitted at Deadline 5 will be finalised post consent stage in 2027. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	economic impacts will be proactively managed, particularly in the context of multiple concurrent NSIPs operating within the region. The current approach does not include measures that respond to workforce scale, skills demand, cumulative labour pressures, or displacement risks, nor does it provide mechanisms capable of adapting to changing socio-economic circumstances over the construction period. SCC further considers that mitigation which is relied upon to support conclusions of limited or non-significant socio-economic effects must be clearly defined, deliverable, and capable of being secured and monitored. The reliance on general embedded design measures does not provide sufficient certainty that socio-economic impacts will be appropriately mitigated. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	
3.9.8	Standard mitigation	Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered	SCC supports the standard mitigation measures proposed but requires a stronger commitment to: • Maximising local employment opportunities, with clear targets and monitoring mechanisms. • Securing apprenticeships and training schemes in collaboration with Suffolk training providers.	Not agreed

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		appropriate and adequate, in terms of its nature and scale, to address potential effects. In response, and to elaborate on what the Applicant said in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has engaged with the LPAs and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The Applicant presented the **8.13 Outline Employment and Skills Plan [REP5-215]** to LPAs, including SCC, on 7 May 2026 and requested comments back by 21 May 2026. The Applicant received SCC's comments on the Outline Employment and Skills Plan on 20 May 2026 and considered them in finalising the document that was submitted at Deadline 5. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	• Strengthening commitments to local business engagement, including SMEs. • Implementing real-time monitoring mechanisms for employment, wage inflation, and workforce displacement risks, ensuring adaptive mitigation. • Ensuring collaboration across NSIPs in Suffolk to address cumulative socio-economic pressures proactively. SCC notes the Applicant's intention to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5 and welcomes this as a positive step. SCC considers that such a plan has the potential to address gaps in the current ES approach to skills, education and employment, provided it is sufficiently robust, evidence-based and aligned with SCC policy and Supplementary Guidance. However, SCC notes that no engagement on the content, scope or status of the proposed Employment and Skills Plan has yet taken place. SCC therefore considers that, at this stage, the proposed Plan cannot be relied upon to support conclusions regarding the adequacy of mitigation or the significance of socio-economic effects, particularly where the Applicant maintains the position that such measures do not constitute mitigation. SCC's expectation is that the Employment and Skills Plan should be developed	

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			collaboratively with host authorities and relevant partners, should be informed by robust and up-to-date workforce and labour market evidence (including cumulative NSIP effects) and should set out clear, deliverable commitments. This should include phase-specific workforce forecasts, quantified and monitored local employment and apprenticeship commitments, clearly defined engagement with local training providers and supply chains, and mechanisms for monitoring and responding to labour market pressures such as displacement or wage inflation. In order to carry weight in the examination and decision-making process, the Employment and Skills Plan should be appropriately secured through the DCO or an associated Requirement, with clear governance and monitoring arrangements. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	
3.9.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 15.6 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C].** Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant provided the following comments in response to the query raised:	SCC provided the following comments during their review of the Statement of Common Ground on 16 October 2025: • The additional mitigation measures are not considered adequate in addressing the full socio-economic impacts, particularly in relation to skills, education, and employment. The measures focus primarily on minimising disruption to recreation, tourism, and community	Not agreed

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		• The scale of construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. However, as stated above, the Applicant is committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	access. Without these commitments, the Project risks missing a critical opportunity to deliver a meaningful and lasting socio-economic legacy for Suffolk communities. SCC continues to hold this position. SCC does not agree with the Applicant's conclusion that the modest scale of construction employment removes the need for additional mitigation in respect of skills, education and employment. The assessment of effect significance does not, in SCC's view, negate the requirement to secure appropriate mitigation where a project presents clear opportunities to contribute positively to local workforce development or to manage cumulative labour market pressures arising from multiple NSIPs. SCC also notes the Applicant's reliance on wider corporate programmes and voluntary community benefit initiatives to support employment and skills outcomes. SCC does not consider that such initiatives can be treated as mitigation, as they are not project-specific, are not secured through the Development Consent Order and are not directly linked to the Project's construction programme or evidenced workforce demand. As a result, they cannot be relied upon to address identified or potential socio-economic effects, nor can they carry	

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			weight in the examination where conclusions of no significant effect are reached. SCC remains of the view that additional mitigation should include clear, deliverable and project-specific measures relating to skills, education and employment, informed by robust workforce evidence and secured through the DCO where necessary. This is particularly important in Suffolk, where cumulative workforce demand from other NSIPs places additional pressure on skills pipelines, training provision and local labour markets. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	
EIA – Assessment Conclusions				
3.9.10	Construction effects	The assessment of effects during construction is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]**. The assessment of effects during construction presented is considered appropriate. SCC comments are noted. In consideration of the new Socio-economic Effects of NSIPs Supplementary Guidance Document (SGD) developed by SCC, the ES chapter has identified the direct impact (i.e. construction workforce) and indirect impact (i.e. supply chain) – however, material supply and demand would vary significantly, and it is not possible	SCC acknowledges the commitment to a more detailed assessment of construction effects in the future and supports this approach. SCC recommends that the assessment utilise the Supplementary Guidance Document: Skills, Workforce and Supply Chain Assessment and Mitigation to ensure accurate and appropriate determination of construction effects and corresponding interventions. This should be aligned with NPS EN-1 (5.13.4) to ensure best practice in assessing and mitigating socio-economic impacts.	Not agreed

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		to specify sources at the time of submission of the DCO application as stated in Paragraph 15.7.7. of the **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** during construction. Operational impacts have been scoped out in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. The Applicant will work constructively with Local Authorities and local partners to understand priorities relating to skills and employment and to support, where appropriate, initiatives that leave a positive legacy for communities. These activities will be progressed through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance. The matrix presented in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** comprises five levels of effect significance: High, Medium, Low, Very Low and No change. This contrasts with the three levels of High, Medium and Low, outlined in the SPD. The use of the five-level matrix in the ES enables a more nuanced assessment of potential impacts on the local economy and local employment. However, this methodological difference does not materially alter the overall conclusions of the assessment.	SCC does not agree that the assessment of construction effects presented in Section 15.7 of the Environmental Statement is currently appropriate or adequate. SCC notes the Applicant's position that material supply and demand vary and that specific sources cannot be identified at the time of submission. However, SCC considers that this reinforces rather than justifies the need for more robust and granular assessment of construction workforce demand, skills requirements and cumulative labour pressures at the ES stage. Without this level of detail, the assessment cannot reliably characterise the scale or distribution of effects, nor inform whether mitigation is required. SCC also does not accept that reliance on future engagement with local authorities and partners, progressed through non-statutory community benefit and engagement mechanisms, can address identified or potential socio-economic effects. Such activities do not constitute mitigation, are not secured through the Development Consent Order and cannot be relied upon to support conclusions regarding effect significance. Where conclusions of limited or non-significant effects are reached, SCC expects these to be underpinned by robust evidence and secured measures, rather than future aspirations or voluntary initiatives.	

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		The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	In relation to methodology, SCC notes the Applicant's explanation regarding the use of a five-level significance matrix. SCC considers that the choice of matrix does not, in itself, resolve the underlying concerns regarding the evidence base for the assessment of construction effects. In particular, the absence of phase-specific workforce modelling, cumulative NSIP labour demand analysis and consideration of skills availability limits the robustness of the conclusions reached, irrespective of the number of significance categories applied. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	
3.9.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C].** **6.20 Scoping Opinion [APP-297]** states that impacts relating to operational employment and the economy can be scoped out of the ES on the basis that the Project would not generate a significant number of additional jobs, and that significant indirect employment i.e. to supply chains, is unlikely. The assessment of effects during operation (and maintenance) as presented in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism**	SCC acknowledges that operational employment effects were scoped out in accordance with the Scoping Report and Scoping Opinion. However, SCC considers that the presentation of operational and maintenance-phase socio-economic effects within Section 15.7 lacks clarity in relation to the nature, scale and characteristics of any ongoing skills, education or employment requirements associated with the Project. As drafted, the assessment does not clearly explain the workforce profile anticipated during operation and maintenance, nor how this interacts with the local and regional labour market context.	Not agreed

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		[Revision C] is therefore considered appropriate. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC also notes that, even where operational effects are scoped out of detailed assessment, sufficient clarity is required to demonstrate why such effects are unlikely to give rise to skills, training or employment implications, particularly in a region experiencing cumulative pressure from multiple NSIPs. In the absence of clear narrative and supporting evidence, SCC is unable to confirm that potential operational workforce effects have been fully considered or appropriately justified.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [Revision C]** and is appropriate for managing construction impacts from the Project. The Applicant provided the following comments in response to the query raised: • The scale of construction employment arising from the Project is modest. The Environmental Statement concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. However, as stated above, the Applicant is committed to supporting employment, skills and workforce development at a local and regional level through its wider	SCC acknowledges discussions on the Outline CoCP but considers additional socio-economic mitigation and monitoring is required as a result of the above responses. For examples: • Legally enforceable socio-economic and skills commitments within the DCO. • A robust monitoring and reporting framework for economic and workforce impacts. • Defined responsibilities for mitigating adverse effects on local businesses and labour markets and capitalising on positive effects. SCC does not accept the Applicant's position that monitoring for economic and workforce impacts is not required on the basis that effects are anticipated to be non-significant.	Not agreed

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		corporate programmes and community benefit initiatives • Local economy, local employment and tourism economic impacts are not anticipated to be significant. Therefore, monitoring for economic and workforce impacts will not be required. • Responsibilities for mitigating potential adverse effects on Socio-economics, Recreation and Tourism are set out in **7.2 Outline Code of Construction Practice [Revision G]**. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC considers that conclusions of limited or non-significant effect must be supported by appropriate monitoring, particularly in a region experiencing cumulative workforce pressures from multiple NSIPs. Without such monitoring, there is no mechanism to identify unforeseen impacts, assess displacement risks or respond to emerging labour-market pressures during construction. SCC does not consider that reliance on voluntary corporate programmes or community benefit initiatives can substitute for project-specific mitigation or monitoring secured through the DCO. These initiatives are not legally enforceable, are not directly linked to the Project's construction programme, and cannot be relied upon to manage or mitigate socio-economic effects identified through the assessment process. SCC confirmed during a meeting in June 2026 that this matter is not agreed.	

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3.10 Traffic and Transport

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The Water Preferred Policy (National Highways, 2019) is referred to in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** and the **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** which requires the assessment of all transportation options for movements of the largest AILs, including the use of ports and inland waterways. The **7.11 Transport Assessment [APP-333]** provides a list of all Transport Guidance. LHA supplementary guidance for Traffic and Transport were reviewed from all LHAs where available, this included the SCC guidance for NSIPs. However, these were not explicitly referenced within Section 2: Key Planning Policy Context.	SCC agrees.	Agreed
EIA – Approach and Methods				
3.10.2	Study area	The A140 between A14 junction and A143 junction has not been assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**, as this road forms part of the Major Road Network and is not considered a Primary Access Route (which consist of roads on the local highway	***Understood Position from Response to January 2025 Draft SoCG:*** Would like the inclusion of A140 to be within scope, particularly in terms of road safety, cumulative traffic* and AIL accessibility over structures.	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		network considered more susceptible to change in traffic flows). However, within the **7.11 Transport Assessment [APP-333]** the anticipated increase to future Baseline traffic along the A140 as result construction activity for the Project was reviewed using available DfT online traffic flow data. Key junctions that were identified by SCC as needing further review were assessed, which included modelling for Site 16: A140 / A143 Old Bury Road and Site 35: Stoke Ash. The Applicant has engaged with SCC regarding their safety concerns at Site 35: Stoke Ash junction (see comments below for TA) . The A140 Junction (Stoke Ash) has been added to **7.3 Outline Construction Traffic Management Plan [Revision F]** Table 5.10 for monitoring through the construction period. The **7.3 Outline Construction Traffic Management Plan [Revision F]** includes a commitment to develop, as part of the final Construction Traffic Management Plan, a monitoring and mitigation framework. The framework will include the proposed details of monitoring of junctions and additional mitigation measures that could be implemented during construction, where certain conditions (trigger points) are met. The framework will include Site 16: A140 / A143 Old Bury Road and Site 35: Stoke Ash. The Applicant is committed to continue discussions with ECC, which will likely	*noting that other NSIPs are now potentially in scope.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.10.3	Data sources	The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	SCC is reviewing the information provided in the DCO application.	Under Discussion
3.10.4	Transport Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the **6.19 Scoping Report [APP-288] to [APP-296] and the 6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. SCC raised in their statutory consultation response that they accept scoping out of transport issues from the operational phase except for AIL movements. AIL movements during operation would be ad hoc and not result in likely significant effects therefore as per the **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate, they have not been assessed in the ES. An assessment was undertaken in accordance with **6.19 Scoping Report [APP-288] to [APP-296] and the 6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** which also assesses inter-project cumulative effects from clusters of other development. The inter-project cumulative effect on PRoWs has been reviewed and is presented within **6.17.A1 Environmental**	***Understood Position from Response to January 2025 Draft SoCG:*** Cumulative impacts of projects on PROW from multiple projects also needs to be assessed. *Understood Position from Relevant Representation November 2025:* *"The Council considers that in the case of cumulative impact there is a particular need for there to be direct consideration of an important aspect of inter-project effects, which is not at present adequately captured by the ES or the TA. The Council considers there is a third type of cumulative impact other than Intra-project and Inter-project effects. This is the repeated impact of multiple NSIPs or other major projects in a geographical location over a length of time, specifically repeated impacts on a community by repeated delivery of these schemes. An example would be a series of repeated closure of PRoW which*	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Statement Appendix 17.1 - Intra-Project Cumulative Effects [APP-282]. The overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [Revision D]**, is to maintain access along Public Rights of Way (PRoWs) at all times throughout the construction period, either through managed access along the PRoW on its existing alignment or through provision of appropriate diversions. As such there are no PRoWs within Suffolk that would be subject to closure without diversion, no severance of the overall network as a result of the Project, and disruption to PRoW users would be limited. AIL operational state impacts are covered by the item below. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	*would have a cumulative impact on amenity, severance and public health."*	
3.10.4a	AIL operational stage impacts	The Applicant notes SCC's concerns of the exclusion of AIL operational movements from the assessment. Operational effects were scoped out of the Environmental Statement (Volume 6 of the Development Consent Order application), as per **6.20 Scoping Opinion [APP-297].** Special-order movements associated with maintenance and operational activities will be infrequent and irregular.	*"Whilst SCC accepts that most transport impacts for the operational phase are scoped out it considers that the AIL operational movements should be included with assessment. This is due to concerns about the resilience of the routes, for example being compromised by weight or other limits being placed on the network, together with the impacts of any temporary measures to overcome these. The Council*	Under Discussion

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		Where special-order movements are required following completion of the construction, the standard procedure will be followed. This will include engagement with the Local Highway Authorities, and use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system. Long-term resilience is covered under item 3.10.73. The Applicant is committed to continue discussions with ECC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	*accepts that inclusion of improvements to the Lorraine Way / Bullen Lane junction is a move towards this."*	
3.10.5	Key parameters and assumptions	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 **of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. The key parameters and assumptions presented are considered appropriate. The Applicant will continue to engage with SCC on this matter. Vehicle occupancy is covered by Item 3.10.42 below, therefore the Applicant suggests this item is moved to Agreed.	In general SCC accepts the key parameters and assumptions are acceptable and represent a realistic worst case scenario with the exception of the vehicle occupancy – see [3.10.42]	Agreed
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The Applicant notes the baseline conditions identified by Suffolk County Council. The baseline conditions and receptors for Traffic and Transport are presented in Section 16.5 **of 6.16 Environmental**	*Latest position from Local Impact Report February 2026* SCC note baseline conditions within the LIR	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Statement Chapter 16 - Traffic and Transport [Revision B]. The baseline conditions and receptors presented are considered appropriate. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.10.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in Section 16.6 **of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. SCC comments are noted. A further review of all adjacent NSIPs and available construction details has been undertaken and is included within the 7.11.1 Transport Assessment Addendum [REP5-165]). Please refer to Item 3.10.29 on cumulative developments. Please refer to Item 3.10.52 below which captures the monitoring and mitigation of unforeseen circumstances. As no further concerns have been raised by	**Understood Position from Response to January 2025 Draft SoCG:** SCC email 4th Nov 2024 - Transport – concern over consultants assuming diversions onto public highways are acceptable, and more generally not following guidance and policies. SCC concerns due to cumulative impact of 'embedded mitigation' for adjacent NSIPs specifically creation of new network peak due to coincidental shift changes have yet to be reviewed SCC accepts that the embedded mitigation measures are acceptable subject to robust monitoring, reporting and enforcement during the construction phase to ensure these measures are effective.	Agreed

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		SCC outside of these items, the Applicant suggests this item is Agreed.		
3.10.8	Standard mitigation	Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in Section 16.6 **of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]** and set out in the **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The concerns about the application of a standard bellmouth or crossing design are addressed in item 3.10.61 below.	**Understood Position from Response to January 2025 Draft SoCG:** SCC raise concerns about the application of a standard bellmouth or crossing design without considering site specific features such as topography and road width. SCC accept that what has been provided is reasonable and proportionate at this stage, and recognises that traffic management can be used to mitigate unforeseen risks, however does reserve the right to refuse to accept designs that cannot provide safe access/crossing points from/across the public highway.	Agreed
3.10.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 16.6 **of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. The construction effects for all B class roads that form Primary Access Routes (PARs) for the Project have been assessed within the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]** for pedestrian, cyclist and horse-rider severance and amenity. This takes into consideration sensitive receptors and provision for these users. Within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and**	*Latest position from Local Impact Report February 2026* *"On the B class roads provision of footways is at best intermittent and usually absent as are crossings, even informal ones comprising just dropped kerbs. This creates isolation and severance between and within communities if traffic increases."* *"Typically, throughout Suffolk the local roads connect nodes of settlement resulting in significant differences to the character of the highway, for example sections of open road with few junctions, dwellings or businesses between clusters of houses.*	Agreed

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		Transport Construction Effects [Revision B] no significant effects were identified taking account of additional mitigation such as PAR 12 - B1113 Finningham Rd/B1113 Walsham Road where we are proposing to provide information within the driver information pack of locations where pedestrians cross the carriageway or could be walking on carriageway, cutting back vegetation and maintenance of verges, improve existing advanced warning signage, notices on Public Right of Way access and surface colouring under 'SLOW' markings. Details can be found within Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision F].** The adequacy in the provision of footways and crossings has been considered in the assessment of pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation, specifically in relation to the sensitivity of the Primary Access Routes within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B]**. Where the assessment has identified a significant effect, appropriate mitigation measures have been proposed. Please refer to Item 3.10.52 below which captures the monitoring and mitigation of unforeseen circumstances. Additional mitigation is therefore considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	*Services such as schools and community centres are located off, but close to, routes but away from parts of the settlement proposed for construction traffic requiring local residents to cross these routes."* Subject to ongoing monitoring and a commitment to mitigating any unforeseen impacts relating to project traffic this can be agreed.	

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		The Applicant suggests this matter is moved to Agreed.		
EIA – Assessment Conclusions				
3.10.10	Construction effects – Vegetation	The impacts on trees, hedgerows and vegetation from the preliminary designs can be seen within documents **2.16 Trees and Hedgerows to be Removed and or Managed Plans [Revisions C/D as relevant]**, and have been assessed as worst-case scenario. Detailed design for each site, including the development of speed restrictions or provision of temporary traffic management mitigation measures may further reduce the environmental impacts presented within these plans. The Applicant notes that relevant commitments to vegetation removal and replacement are covered elsewhere in this document (see item 3.8.6 and item 3.8.11). Monitoring and mitigation of unforeseen circumstances is covered by item 3.10.52. The Applicant considers this matter to be Agreed	**Understood Position from Response to January 2025 Draft SoCG:** SCC email 4th Nov 2024 - Transport – potential loss of trees and hedgerows. Subject to an acceptance by the applicant if it is unavoidable that highway trees or hedges are removed mitigation shall be provided on site or if not possible compensation planting elsewhere agreed. SCC agrees as separate item added under 3.10.52 on monitoring and mitigation of unforeseen circumstances.	Agreed
3.10.11	General Construction effects	The Applicant has assessed driver delay and public transport delay to passengers in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. Overall, the significance of effects was deemed to be slight and not significant and therefore would not severely impact public transport users and emergency/public services. This takes into	*Latest position from Local Impact Report February 2026* "Key issues facing road users include: i. Delay to public transport and other road users including emergency services and public services.	Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		consideration the duration of peak construction activity and proposed mitigation along PARs and at sensitive junctions as set out in Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision F].** The exception to this is Primary Access Route (PAR 23) – A1071 where a moderate effect on delay was identified. Details can be found within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B]**. It is understood that the junctions along PAR 23 suffer from existing congestion. The Applicant was made aware that both junctions are to be upgraded as part of the planning application Land North of the A1071, Ipswich (Wolsey Grange) Ref DC/21/02671 granted in 2023. The Applicant has undertaken modelling of the proposed new junction highway layouts at Site 32 A1071 / B1113 Swan Hill roundabout and Site 31 - A1214 London Rd / A1071 at the request of Suffolk County Council as the implementation of these schemes had not been confirmed. It was identified that both junctions will accommodate the future baseline flows with committed development and Project construction traffic without significant capacity issues. At Site 32 the junction is predicted to operate within capacity with the Project construction flows. For Site 31, mitigation is proposed in the form of updates to signal controller, intergreens, phase delays and road markings. Additional junction modelling	Subject to ongoing monitoring and a commitment to mitigating any unforeseen impacts relating to project traffic this can be agreed.	

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		undertaken by the Project will be submitted as an addendum to the **7.11 Transport Assessment [APP-333]** during examination at Deadline 5 (**7.11.1 Transport Assessment Addendum [REP5-165]**). The assessment of effects on PRoW amenity during construction is presented in Section 13.7 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [Revision B]**. The assessment of effects during construction presented is considered appropriate. The applicant therefore feels that adequate assessment and mitigation has been proposed to address these key issues. Section 5.8.3 of the **7.3 Outline Construction Management Plan** [**Revision F**] states that where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Alternatives for cyclist and pedestrian access will be considered in circumstances where safe operation of the works or the safe use by active travel users is compromised. Section 5.8.6 of the **7.3 Outline Construction Management Plan [Revision F]** has been updated to state that "Advance notification of planned diversions and closures will be issued to relevant stakeholders (such as Royal Mail, Blue Light Services and bus operators) where these may affect their operation, at the earliest possible opportunity."		

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		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed		
3.10.12	Construction effects - WCH	The Applicant has assessed pedestrian, cyclist and horse-rider safety, fear and intimidation, and severance in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. The assessment identified that the significance of effects is considered to be neutral or slight on all PARs within Suffolk where appropriate mitigation has been proposed. Details of this assessment can be found within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B].** Proposed mitigation is set out in **7.3 Outline Construction Traffic Management Plan [Revision F],** where we are proposing to provide information within the driver information pack of locations where pedestrians cross the carriageway or could be walking on carriageway, cutting back vegetation and maintenance of verges, improve existing advanced warning signage, notices on Public Right of Way access and surface colouring under 'SLOW' markings. The Applicant therefore feels that adequate assessment and mitigation has been proposed to address these key issues. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	ii. Safety, fear, intimidation and severance as construction traffic impacts pedestrians and cyclists where provision of sustainable transport infrastructure or alternatives and limited. iii. Loss of amenity both on rights of way but also highways used to link or access these ." Acknowledged that these impacts are likely to be transitory during the construction, but unforeseen impacts may occur due to the uncertainties of dealing with an evolved rural network. Subject to ongoing monitoring and a commitment to mitigating any unforeseen impacts relating to project traffic this can be agreed.	Agreed

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3.10.13	Construction effects - WCH	Significance of effect has been derived by considering the sensitivity (or value) of the receptors within the Study Area, and the magnitude of change (impact) likely to be caused by the activities of the Project. These factors are combined to give an overall significance of effect. The methodology can be found within Section 16.4 of the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. The assessment of significance of effects for pedestrians, cyclists and horse-riders is presented within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B]**. Although the magnitude of impacts identified for Primary Access Routes (PARs) may be identified as moderate or major, when assessed against the sensitivity of the links the overall significance of effects is found to be slight in the PARs listed by Suffolk County Council. A summary for these PARs can be found within Table A16.4.8 in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B]**. This also takes into consideration the mitigation measures outlined within Section 5.9 of **7.3 Outline Construction Traffic Management Plan [Revision F].** The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On	*Latest position from Local Impact Report February 2026* *"The following PAR links have been considered by the applicant to have a Moderate Adverse effect on non-motorised users; however, no mitigation has been suggested:* *i. Link PAR 11 - Lion Road* *ii. Link PAR 13 - Wickham Road* *iii. Link PAR 16 - A1120 Church Road / A1120 Bell's Lane* *iv. Link PAR 20 - B1113 Bramford Road / B1113 Loraine Way* *v. Link PAR 24 - B1070 (A12 access)* Acknowledged that these impacts are likely to be transitory during the construction, but unforeseen impacts may occur due to the uncertainties of dealing with an evolved rural network. Subject to ongoing monitoring and a commitment to mitigating any unforeseen impacts relating to project traffic this can be agreed	Under discussion

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		this basis, this matter is retained as Under Discussion.		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.14	Outline CoCP	The **7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]** and is appropriate for managing construction impacts from the Project.	LHA has reviewed the CoCP and the environmental management is acceptable. Air Quality for vehicles GG19 Wash down of vehicles included as GG23.Prevention of debris T05. Lighting GG26 Surface water drainage GG32 Dust management AQ01 Retention of hedgerows B08 Drainage at vehicle crossing points W02	Agreed
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.10.15	Policy and legislation	The **7.11 Transport Assessment [APP-333]** provides a list of all Transport Guidance. LHA supplementary guidance for Traffic and Transport were reviewed from all LHAs where available, this included the SCC guidance for NSIPs. However, these were not explicitly referenced within Section 2: Key Planning Policy Context. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	No reference in TA to DfT water preferred policy (EN-1 5.14.16) nor SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters Suffolk County Council agreed this matter during a meeting in May 2026, noting that the addendum to the TA captures these policies.	Agreed

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Transport Assessment – Approach and Methods				
3.10.16	Study Area	The study area comprises all roads along the Primary Access Routes (PARs), the wider road network (SRN/MRN) directly connecting to PAR, PRoW and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within Section 2.21 (Transport Assessment Study Area) of the **7.11 Transport Assessment [APP-333]**. At the request of Suffolk County Council the A140 Stoke Ash junction (Site 34) was also assessed and included within **7.11 Transport Assessment [APP-333].** The Study Area is considered appropriate for the assessment. The **7.3 Outline Construction Traffic Management Plan [Revision F]** details the monitoring and management of construction vehicles within the study area. The driver information management pack will include details of road safety concerns for the PARs.	The study area should also include PROW and WCH routes that interact with the SARs. SCC has reviewed Revision E of the oCTMP and agree.	Agreed
3.10.17	Multimodal Strategy	A Multi-Modal Assessment was undertaken (detailed within **7.11 Transport Assessment [APP-333]** - Appendix G - Multi-Modal Transport Report) and developed to identify and assess opportunities which could make use of alternative transport modes to supply materials for the construction of the project. The **7.11 Transport Assessment [APP-333]** details the sensitivity test which was undertaken from the potential Ports and Sidings, based on maximum throughput of the alternative options, to understand if any	Updated Position from Relevant Representation November 2025: "This project appears to be largely proposing a road only freight strategy with the exception of Abnormal Indivisible Loads ("AIL") arriving by sea. SCC would welcome efforts to explore the practicality of aggregate deliveries through local ports and railhead" as part of ensuring that the multi-modal assessment completed is sufficient.	Agreed

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		additional junctions along the scheme needed to be mitigated. The delivery profile of materials onto Primary Access Routes did not change. The Multi-Modal Assessment provided an indicative potential option for transporting aggregates from local ports and railheads. The Applicant and their appointed Main Works Contractor (MWC) are currently re-assessing the multi-modal options available within the project, including existing available capacities at each of the ports and sidings. This will be incorporated into the updated construction vehicle volumes, which the MWC is developing. The worst case impact on the road network is not anticipated to change, as the assessment was completed on the maximum throughput per day from each port. The vehicle volumes would be expected to remain consistent or reduce through the updated investigation. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	Suffolk County Council agreed this matter during a meeting in June 2026, acknowledging the work done to date on the multimodal strategy and welcoming The Applicant's commitment to further explore multimodal options with the Main Works Contractor.	
3.10.18	Junction Capacity Assessment Methodology	Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented Section 6.9 (Construction Traffic Assessment Methodology Road-only Transport Scenario) of the **7.11 Transport Assessment [APP-333].** This involved a preliminary	*SCC commented that junction modelling is still being reviewed.*	Under Discussion

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		assessment of the estimation of the volume to capacity (V/C) ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate. The Applicant will continue to engage with SCC on this matter. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.19	Junction Modelling	The methodology used for undertaking junction assessments is presented in Section 6.9 (Construction Traffic Assessment Methodology) of the **7.11 Transport Assessment [APP-333]**. The assessment methodology used is considered appropriate. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.	SCC reviewing that the junction assessment methodology is acceptable and appropriate.	Under Discussion
3.10.20	Assessment of WCH	The assessment of WCH impacts as a result of the Project is presented in Section 6.18 (Walkers, Cyclists and Horse riders network)	Under review Assessment methodology for WCH is accepted. Accepted that commitment to	Agreed

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		of the **7.11 Transport Assessment [APP-333]**. This is based on the assessment undertaken within Section 16.7 (Residual Effects) of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **6.16.A4 Appendix 16.4: Traffic and Transport Construction Effects of Chapter 16 - Traffic and Transport [APP-275].** The assessment methodology used is considered appropriate. The Applicant will continue to engage with SCC on this matter. Please refer to Item 3.10.52 below which captures the monitoring and mitigation of unforeseen circumstances. The Applicant proposes this item is changed to Agreed.	ongoing monitoring and mitigation of any project related unforeseen impacts is agreeable. For example, SCC would expect the assessment to be reviewed if the vehicle occupancy levels assumed in the assessment are not realised or the frequency or severity of collisions increases	
3.10.21	Impact on Parking	The methodology for the assessment of impact to on-street parking is presented within Section 6.16 (on Street Parking) of the 7.11 Transport Assessment [APP-333]. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate. The Applicant has provided a position on the process for implementing traffic regulation orders in item 3.10.64 below. In line with SCC's comments, this matter is now agreed.	Whilst the methodology of how the impacts are assessed is important SCC will also have comments on the legal process and consultation that will be required to implement any traffic regulation orders. Accepted that all parking restrictions in Suffolk will be temporary, albeit of moderate duration. Version D of the OCTMP in 6.5.2 sets out a commitment to engaging with local communities, businesses and residents which makes this acceptable, subject to the details of the level of engagement being agreed with the LHA which finalising the CTMP. Note: experience delivering NSIPS has indicated that local communities and	Agreed

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			particularly individuals do not have an awareness that the examination is the consultation for such measures.	
3.10.22	Road Safety	An assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in Section 4 **(Baseline Conditions)** of the **7.11 Transport Assessment [APP-333].** Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics. Areas where potential road safety issues have been identified, as set out within Section 7 (Transport Assessment) of the **7.11 Transport Assessment [APP-333],** will be highlighted within the Driver's pack as part of mitigation measures secured within the **7.3. Outline Construction Traffic Management Plan [Revision F].** The assessment methodology used is considered appropriate.	RSA's have been reviewed by SCC and accepted. .	Agreed
Transport Assessment – Mitigation Measures				
3.10.23	Mitigation Measures	Mitigation measures include embedded, standard and additional mitigation identified within Section 2 **(Project Description)** of the **7.11 Transport Assessment [APP-333]** and as reported within Section 16.6 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B].** This	SCC is reviewing the information submitted for the DCO. Subject to sufficient monitoring and reporting to demonstrate that the embedded mitigation measures are applied and are effective this can be agreed. This includes reporting	Under Discussion

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		includes the **7.2 Outline Code of Construction Practice [Revision G], 7.3. Outline Construction Traffic Management Plan [Revision F] and** additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate and have been discussed with SCC at Thematic Group and Regional Meetings. Please refer to Item 3.10.52 below which captures the monitoring and mitigation of unforeseen circumstances. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	regular monitoring reports o the LHA/LPA to demonstrate this.	
3.10.24	A140 Stoke Ash Crossroads	The Applicant has been discussing with Suffolk County Council the existing road safety and driver frustration concerns at the A140/A143 Stoke Ash junction and potential solutions. A review of the latest three-year collision data (July 2022 to June 2025) has been undertaken at the junction using the latest DfT online data. Three collisions were recorded at the junction on different approaches and occurring in different years. Two collisions involved turning vehicles (one resulting in serious injury)	*Latest reported within Local Impact Report 2026.* *"There are already significant driver delays at this crossroads, in particular turning out of Workhouse Road onto the A140. Increased construction traffic will cause more anxiety and driver delay at this crossroads and could lead to serious accidents as drivers become impatient."* SCC recognises that this is a difficult perimeter to model in terms of impact. Concerns remain that the frequency or	Agreed

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		and one shunt type collision on the A140 southbound approach resulting in slight injury. The modelling undertaken by the Applicant and shared with Suffolk County Council shows that the junction would operate within capacity. Although there will be an increase in delay on the side roads, there would be minimal impact on queue lengths. The Applicant considers that the level of mitigation required at the junction to resolve the existing (historic) safety issues goes beyond what is reasonable and proportionate to mitigate for a temporary Project with short-term effects, which would have limited impact on driver delay as the duration of the peak is expected to be of one week. The **7.3 Outline Construction Traffic Management Plan [Revision F]** has been updated to include the A140 Junction in Table 5.10 for monitoring through the construction period as requested by SCC. Therefore, the Applicant has moved this matter to Agreed.	severity of collisions may increase due to the additional construction traffic on the A140 reducing the number and length of gaps for joining traffic to turn into. However, SCC would accept a commitment to monitor this (and other) junctions on the PAR and A140 and to investigate any data led concerns and if necessary, apply mitigation.	
3.10.25	A1120 Crossroads	The A1120 crossroads junction was not specifically raised by Suffolk County Council as requiring assessment and as identified, the A140 is part of the Major Road Network. As such an assessment of the junction has not been included within the **7.11 Transport Assessment [APP-333]** as set out in **6.20 Scoping Opinion [APP-297]**.	*Latest reported within Local Impact Report 2026.* *"A1120 crossroads. This location is very similar to the Stoke Ash crossroads in that there is significant driver delay for vehicles turning onto the A140."* Suffolk County Council agreed this matter during a meeting in June 2026, noting that the upgrade of this junction has received funding through the Major Road Network	Agreed

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		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed	(MRN) programme. Agreement is on the basis that adequate monitoring and mitigation measures are included in the CTMP. Post agreement note: SCC is progressing with a bid to improve this junction with funding sought through the MRN fund.	
Transport Assessment – Baseline Conditions				
3.10.26	Policy and Legislation	The **7.11 Transport Assessment [APP-333]** provides a list of all Transport Guidance. LHA supplementary guidance for Traffic and Transport were reviewed from all LHAs where available, this included the SCC guidance for NSIPs. However, these were not explicitly referenced within Section 2: Key Planning Policy Context. An Addendum to **7.11 Transport Assessment [APP-333]** will be submitted during examination at Deadline 5 (**7.11.1 Transport Assessment Addendum [REP5-165]**) which will make reference to SCC guidance for NSIPs. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	No reference to SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters Suffolk County Council agreed this matter during a meeting in May 2026, noting that the addendum to the TA captures this policy.	Agreed
3.10.27	Baseline conditions	The baseline conditions and sensitive receptors for Traffic and Transport are presented in Section 4 (Existing Baseline Transport Conditions) of the **7.11 Transport Assessment [APP-333]** and are considered appropriate. The Applicant will continue to engage with SCC on this matter.	Under review.	Under Discussion

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		The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
Transport Assessment – Future Baseline Conditions				
3.10.28	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in Chapter 5 (Future Baseline) of the **7.11 Transport Assessment [APP-333].** Growth factors have been applied for the peak year of activity and therefore vary along PARs. The use of TEMPro NTEM dataset V7.2 was discussed and agreed with all LHAs at thematic working group meetings. The Applicant considers this approach and the growth rate used is considered appropriate. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.	Under review.	Under Discussion
3.10.29	Cumulative Developments	**7.11 Transport Assessment Appendix D - Committed Developments [APP-337]** provides an overview of the committed developments and transport schemes that were considered in the assessment of traffic	*Latest reported within Local Impact Report 2026.* *5.4.1 – "Committed developments are identified within the ES Appendix 15.3: Long List of Other Developments (application*	Agreed

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		on the road links forming the Primary Access Routes (PARs). Against each development a commentary has been provided as to whether it should be included within the assessment of traffic and transport. Nationally Significant Infrastructure Projects (NSIPs), that might impact the junctions connecting the Primary Access Routes (PARs) to the Strategic Road Network/Major Road Network were identified and considered in the **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337].** For Suffolk County Council, NSIPs reviewed were the Bramford to Twinstead Reinforcement – Overhead Transition Lines project, Sizewell C, East Anglia One and Two North Offshore Wind farms, East Anglia Three (Tye Lane Bramford Suffolk), Sunnica Solar Farm near Newmarket, and Sea Link Project. This includes all relevant NSIPS identified for Strategic Road Network junctions. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement. This review will be published into Examination. The Applicant has provided further details on the cumulative impact of NSIPs with the Project	*document 6.3.15.3)" – SCC will respond once we have received the ES. There are no Committed Developments listed in the TA." Capacity of junctions on the strategic road network, particularly if delivery of multiple NSIPs3.10.24 coincide."* SCC remains concerned about the cumulative impacts of all NSIP related traffic, including that proportion arising from this project, particularly on the A140 between the A14 and Diss in terms of capacity, delay and road safety. However, SCC recognises that N2T is the first DCO in most of this area of Suffolk and that it is not possible to quantify the impacts of future projects that may come forward in the area. The additional assessment in the [REP5-165] Transport Assessment Addendum (Final Issue A) is considered proportional for this project.	

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		within Suffolk within Section 4 of the **7.11.1 Transport Assessment Addendum [REP5-165]** submitted during the examination at Deadline 5. The likely cumulative impact has been assessed within the **6.16 Environmental Statement (ES) Chapter 16 Traffic and Transport [Revision B]**. This assessment looked at that the increase to future baseline traffic as a result of the Project in combination with committed developments along the PARs and suitable mitigation measures have been proposed. The assessment included the impact of NSIP projects that overlapped with the Project construction programme and where the same roads were to be used by construction traffic. Modelling of SRN/MRN junctions was undertaken and reported within the **7.11 Transport Assessment [APP-333]**. This included two junctions on the A140 Site 16: A140 / A143 Old Bury Road and Site 35: Stoke Ash. The Applicant will continue to engage with SCC regarding their safety concerns at the Site 35: Stoke Ash junction. The **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]** includes an assessment of the PRoW network and forms part of the Study Area, but has not explicitly been stated as such. All PRoW that connect to the PAR or are directly impacted by the Project have been assessed.		

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Transport Assessment – Capacity Assessments				
3.10.30	Junction Capacity – A140 Stoke Ash	The Applicant notes this comment. These junctions have been identified as likely to be impacted by the Project's construction traffic and other committed developments as assessed within **7.11 Transport Assessment [APP-333].** Suffolk County Council identified the need to undertake modelling assessment at Site 35 Stoke Ash junction located on the A140 MRB. The junction was modelled during the AM and PM peak hours, the junction would operate within capacity with a slight increase in delay on the side roads. The **7.3 Outline Construction Traffic Management Plan [Revision F]** has been updated to include the A140 Junction in Table 5.10 for monitoring through the construction period.	*Latest reported within Local Impact Report February 2026* *"The LHA considers that the following are significant junction within the applicant's study area.* *i. A140 – Stoke Ash Crossroads*	Agreed
3.10.31	Junction Capacity – A140 / A143 roundabout	For the A140 Ipswich Road / A143 Old Bury Road junction, there would be a 16% increase in total traffic. Modelling of Site 16 - A140 Ipswich Road / A143 Old Bury Rd roundabout found that the junction would operate over capacity in the AM peak in the future baseline, with only a small change in capacity noted as a result of the Project Construction flow. No mitigation has been proposed given the peak impact would occur over a duration of one week and would not cause blocking back to nearby junctions or impact the wider network.	ii. A140 / A143 roundabout	Under Discussion

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		The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.32	Junction Capacity – A1214 / A14 Copdock Interchange	Mitigation at A1214 / A14 Copdock Interchange (Site 29) has been proposed as set out within **7.3. Outline Construction Traffic Management Plan [Revision F].** The **7.11.1 Transport Assessment Addendum [REP5-165]** was submitted during the examination at Deadline 5 which presents the findings of the updated modelling undertaken within Suffolk. The Applicant will present the findings of this assessment to SCC. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.	iii. A1214 / A14 roundabout at Copdock SCC accepts the proposed mitigation on the LHA part of this junction. (ie A1214). SCC defers to NH regarding the A14 and A12 parts of the interchange.	Under Discussion
3.10.33	Inter-project cumulative effects - A140	**7.11 Transport Assessment [APP-333]** assessed the forecast percentage increases of traffic flows on the A140 at the request of Suffolk County Council. It was found that there would be an increase of 35% of HGVs and a maximum increase of less than 10% for total traffic in the AM and PM peak hours, which is deemed to be not significant for a road forming part of the Major Road Network which	*ii. exacerbate pre-existing issues along the A140 route.*	Under discussion

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		appears to operate generally under free-flow conditions with low congestion as identified from Google Traffic typical conditions at peak periods. Therefore, no significant delays are expected. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.34	Inter-project cumulative effects - delay	The Applicant has assessed driver delay and public transport delay to passengers in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. For Link PAR 10 A143 although there would be an increase of 23% of HGVs, no significant effects were identified based on the sensitivity of the road link. For PAR 16 A1120 Church Road/A1120 Bell's Lane and for PAR 17 A1120 south of A14 J50 there would be an increase of 55% of HGVs. Mitigation has been proposed along these PARs to avoid peak hour movements by construction traffic to remove interaction with sensitive receptors (e.g. pupils attending Freeman Primary School). No significant effects were identified following this mitigation and other measures outlined within the **7.3 Outline Construction Traffic Management Plan [Revision F]**. For the PAR 22 A1214 London Road there would be an increase in HGVs of 48%.	*iii. increase HGV movements resulting in increased delay and reduced residual capacity on the A140, A143, A1214 and A1120.*	Under discussion

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		However, no significant effects were identified based on the sensitivity of the road link. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.35	Inter-project cumulative effects – sustainable transport and severance	**7.3 Outline Construction Traffic Management Plan [Revision F]** has been developed in consultation with the Local Highway Authorities. Cycle safety has been discussed with the Applicant, and where necessary, additional access arrangements and improved interactivity, improving safety between Primary Access Routes (PARs) and cycle paths has been incorporated into the proposals. Additional mitigation measures have been established as part of the air quality and noise assessments against Institute of Environmental Management and Assessment guidelines. As set out in Table 5.7 of **7.3 Outline Construction Traffic Management Plan [Revision F]** for the A140, an issue has been detected of potential pedestrians and cyclists at the junction where there is an increase in HGV and total traffic. Although off-carriageway facilities are provided, width is reduced by adjacent vegetation. The additional mitigation proposed is maintenance	*iv. increase HGV movements along the A140 and A143, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.*	Under discussion

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		of vegetation adjacent to shared footway to increase available width. There is no additional mitigation proposed specifically relating to cyclist safety for the A143, A1120 or A1214; however, the driver information pack, which will be provided on site induction, includes information on cycleways and warning of routes which could have a higher volume of cyclists. Further information on the driver information pack is set out in Section 6.2 of **7.3 Outline Construction Traffic Management Plan [Revision F]**. The Applicant will encourage the Main Works Contractor(s) to highlight these specific routes within the driver information pack to ensure construction drivers are aware of the concerns raised. The Applicant has assessed pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [Revision B]**. The assessment for pedestrian, cyclists and horse-riders found no significant effects identified for severance on the A143, A1120, or A1214. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		

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3.10.36	Inter-project cumulative effects – local traffic on minor roads	The assessment of driver and public transport passenger delay shows that there are no significant effects on the A143, A1120 and A1214 as detailed within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [Revision B].** Therefore, the need to use minor roads is not considered likely. The Applicant will liaise with Suffolk County Council during the construction of the Project to address any concerns. Sensitive junctions along the A140, A143, A1120 and A1214 were subject to AM and PM peak hour modelling as presented within **7.11 Transport Assessment [APP-333]**. These assessments considered the cumulative effects on the highway network of the combined Project and other committed developments and mitigation provided where required as outlined within the **7.3 Outline Construction Traffic Management Plan [Revision F]**. The individual PARs are broken down further below. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	*v. reduce the attractiveness of core strategic routes, such as the A140, A1120 and A143, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads."*	Under Discussion
3.10.37	Interproject cumulative effects – PAR 10 Junction modelling	**PAR 10 A143 Old Bury Road:** At Site 16 A140 Ipswich Rd / A143 Old Bury Rd, the junction modelling found no capacity issues for the PM peak. In the AM peak		Under Discussion

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		the introduction of the Project traffic has a minor impact upon junction capacity. The Ratio of Flow to Capacity (RFC) value on the A143 (E) arm increases from 0.93 to 0.99 when compared to the future base with committed development. The delay at this arm rises from 33 seconds to 70 seconds. At Site 17 A143 Old Bury Rd / B1077 Stuston Rd roundabout, the junction modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1077 Stuston Road north arm, with a delay of 5 seconds and an RFC of 0.42. At Site 18 A143 Old Bury Rd / Lion Rd Priority Junction, the junction modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the Lion Road (N) Right Turn, with a delay of 15 seconds and an RFC of 0.44. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		

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3.10.38	Interproject cumulative effects – PAR 16 Junction modelling	**PAR 16 A1120 Church Road/A1120 Bell's Lane:** At Site 21 A14 J50 Cedars Interchange, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM Future Base plus Committed Development and Project flows on the A14 WB offslip, with a delay of 5 seconds and an RFC of 0.57. At Site 22 A1120 (Church Rd / B1115 Stowmarket Rd Priority Junction), an off-peak hour modelling assessment was undertaken to avoid the AM and PM peak hours as a result of mitigation proposed along PAR 16 to avoid school drop-off and pick-up periods. It was found that the addition of the Project would not have a significant impact on capacity. The highest RFC occurs in the AM Future Base plus Committed Development and Project flows on the B1115 (W) Right Turn with an RFC of 0.68, with a delay of 37.67 seconds, an increase of 6.52 from Future baseline. At Site 23 A1120 Church Rd / Thorney Green Priority Junction, the modelling found that the addition of the Project traffic does not have a materially detrimental impact upon junction operation. The only notable delay occurs during the AM peak at the Thorney Green (NW) right and ahead movement, increasing from 26 seconds in the Base to 38 seconds with Project flows. This movement operates		Under Discussion

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		within capacity with the Project flows (RFC of 0.46). The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.39	Interproject cumulative effects – PAR 17 Junction modelling	**PAR 17 A1120 (south of A14 J50):** At Site 24 A1120 / Gun Cotton Way roundabout, the modelling found that the addition of the Project traffic has a negligible impact upon junction capacity. The highest RFC occurs in the PM on Gun Cotton Way, with an RFC of 0.51 and a delay of 5 seconds. At Site 25 A1120 / B1113 Needham Rd the modelling found the junction operates within capacity across all scenarios and time periods, with no significant delays. The highest degree of saturation (DoS) occurs in the AM Future Base plus Committed Development and Project flows on the B1113 Needham Road U-turn left, with a DoS of 80.7% and a delay of 35 seconds, an increase of only 2.3 seconds when compared with the future baseline with committed developments. Mitigation at the junction is in the form of signal optimisation. Modelling of the A14 has been undertaken at Site 26 A14 J52 Claydon Roundabout. The junction would operate within capacity with no		Under Discussion

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		impact expected as a result of construction traffic from the Project. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
3.10.40	Interproject cumulative effects – PAR 22 Junction modelling	**PAR 22 A1214 London Road:** At Site 29 A14 J55 Copdock Interchange the modelling found that the junction would operate over capacity during the worst case peak construction period (one-week duration) and when tested with the 85 percentile of Project traffic (approximately a six month duration). Mitigation at the junction is currently being progressed and includes signal and cycle time optimisation, a change to lane and destination arrow markings on the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway. With mitigation the junction is predicted to perform better, most notably under the 85th percentile scenario. The Applicant will continue to engage with Suffolk County Council on the proposed mitigation and modelling assessments. At Site 30 A1214 London Rd / Scrivener Dr roundabout, under the existing highway arrangement, the modelling found that the roundabout operates within capacity across all scenarios and time periods, with no significant delays. The highest DoS occurs		Under Discussion

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		in the PM Future Base plus Committed Development and Project flows on the Ahead/Left Lane of Retail Park EB, with a delay of 21.3 seconds and a DoS of 88.4%. Mitigation at the junction is in the form of signal optimisation. At Site 31 A1214 London Rd / A1071 the modelling found that the partially signalised junction operates within capacity across all scenarios and time periods in the AM peak, but mostly just above capacity in the PM peak, with delays reaching a high of up to 95.5 seconds after incorporating mitigation. The highest DoS occurs in the PM Future Base plus Committed Development and Project flows on the Ahead/Left/Right Lane of Scrivener Drive NB, with a delay of 120 seconds and a DoS of 97.2%. Mitigation at the junction is in the form of rationalising Intergreens, adding phase delays and optimising signals. It is understood that this junction will be upgraded as part of the approved planning application Land north of the A1071 (DC/21/02671), although a construction date has not been agreed. As such the Applicant is currently in the process of modelling the upgraded junction to assess the impact of the Project on capacity, and will continue to engage with Suffolk County Council of the results of the latest assessment. The Applicant notes the concerns raised by SCC on this matter in their independent Transport Assessment Review, dated on 12th		

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		June 2026. The Applicant will continue to engage with SCC on this matter, and considers this item to remain under discussion.		
Transport Assessment – Trip Generation				
3.10.41	Key Assumptions – core working hours	The Applicant considers that the construction working hours currently proposed are justified and necessary to meet the project completion date. The proposed core working hours are based on standard hours applied across major infrastructure projects, allowing for efficient delivery while maintaining safeguards to manage noise and other impacts. The **7.3 Outline Construction Traffic Management Plan [Revision F]** details the working hours, and that "deliveries by HGVs are limited to Mondays to Fridays 07:00-19:00 and Saturdays 07:00-17:00, unless otherwise agreed with the highway authorities". The working hours are secured through Requirement 7 of Schedule 3 of the **3.1 Draft DCO [Revision G]**. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project which was considered in the **6.14 Environmental Statement Chapter 14 - Noise and Vibration [Revision B]**. The assessment concluded that with the embedded mitigation and controls set out in the **7.2 Outline Code of Construction Practice [Revision G]** significant effects from	6.2.3 – SCC objects to HGV deliveries being made over the weekend. Updated Position from SOCG Review January 2026: SCC seeks clarity if the "deliveries" referred to in the Transport Assessment includes trips associated with removals from the site, and if the core working hours still generally apply for these construction vehicle trips.	Agreed

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		noise and vibration during the construction phase are not anticipated. Requirement 7 of the **3.1 Draft DCO [Revision G]** details that 'Subject to sub paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority'. HGV movements to site are intended to be deliveries, unless associated with material removal. HGVs will not remain on site from a delivery, as a result every delivery is a two-way movement. The **7.3 Outline Construction Traffic Management Plan [Revision F]** states that construction traffic operating outside of the agreed hours is a matter of non-compliance. Therefore, all HGV movements on the primary access routes are controlled by the Construction Traffic Management Plan irrespective of whether they are delivering material to or from site. Requirement 7 of the **3.1 Draft DCO [Revision G]** details that 'Subject to sub paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority'. HGV movements to site are intended to be deliveries, unless associated with material removal. HGVs will not remain on site from a delivery, as a result every delivery is a two-way movement. Section		

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		5.4 of the **7.3 Outline Construction Traffic Management Plan [Revision G]** to be submitted at Deadline 7 will include this definition. The amendments requested by SCC have been actioned, therefore in line with SCC's comments this matter is now Agreed.		
3.10.42	Key assumptions – vehicle occupancy	Section 6.4 of the **7.11 Transport Assessment [APP-333]** provides an overview of the construction staff occupancy assessments. The office-based staff have an assumed vehicle occupancy of one (as a worse case, as less information about their movement patterns are known). The construction workers vehicle capacities were provided by the technical teams, when developing the LGV numbers associated with each construction activity. The numbers were provided based on their prior experience. The OHL and Cables and Substation workers are assumed to stay in similar hotels, and some car sharing is anticipated, hence the vehicle occupancy of two. Information was made available from the technical teams that they would sign in at a main site / compound before travelling to their site of work. The movement from the main site / compound to their site of work would be completed in crew vans (with a vehicle occupancy of six). Section 5.2.1 of the **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan**	6.2.8 – The assumption of a vehicle occupancy of 2 people per vehicle is optimistic and unrealistic.	Not Agreed

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		[Revision C] has been updated to state that construction workers associated with OHL and Cables and Substations is to achieve an occupancy rate of 2 per vehicle (as per assumptions). The updated **7.3 Outline Construction Traffic Management Plan Appendix B: Outline Construction Worker Travel Plan [Revision C]** details that the vehicle occupancy factors will form part of the baseline survey targets, with the survey shared with the Local Highway Authority. This will capture the surveyed mode share from when a site is occupied.		
3.10.43	Methodology	The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of the **7.11 Transport Assessment [APP-333]** is considered suitable and robust. The Applicant will continue to engage with SCC on this matter. With the exception of the vehicle occupancy matter above (3.10.42), SCC have raised no further concerns. The Applicant proposes that this matter can be moved to Agreed.	Under review. SCC accepts the Applicants assurances that the trip generations represent a realistic worse case scenario based on their prior experience with other similar projects.	Agreed
3.10.44	Construction Vehicle Trips	The construction trip estimations associated with each construction activity were provided by the appropriate technical teams, when developing the LGV numbers associated with each construction activity. The numbers were provided based on their prior experience for projects of this scale.	Under review based on experience being gained from other NSIPs in the delivery phase. Generally SCC accept this position but with important caveats The vehicular occupancy ration is not agreed – see3.10.42 and dependant on	Agreed

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		The trip generation has been based on the most up to date construction programme available at the time of assessment. The Outline Construction Traffic Management Plan [Revision E] details the robust framework the Applicant is proposing to assess and compare the HGVs expected through the booking system, against those assessed within the Transport Assessment/ Environmental Statement. Should the three-month look ahead identify any predicted potential exceedances compared to the construction traffic forecasts reported in the above documents and National Grid's EnvCoW considers that these would have the potential to introduce materially new or materially different residual effects, the Main Works Contractor(s) will discuss with National Grid and the relevant Local Highway Authority, and National Highways, where appropriate, suitable steps to avoid or mitigate such effects. The **Outline Construction Traffic Management Plan [Revision F]** commits to including vehicle HGV numbers within the quarterly report. With the exception of vehicle occupancy (3.10.42), and vehicle caps (3.10.54), SCC have raised no further concerns relating to construction vehicle trips. Therefore, the applicant considers this matter to be Agreed.	what ration was uses in the trip rate calculations would create a greater impact in terms of vehicle numbers if not achieved. Therefore SCC considers it reasonable that the vehicle occupancy and worker numbers are reported on a regular basis and any exceedance reported to the LHA/LP together with proposed mitigation or corrective action. SCC accepts that Applicants calculation of HGV trip rates is a realistic worse case and based on previous similar projects. However, to give the LHA confidence in such assurances a cap placed on HGV movements is considered reasonable as for SPR and SZC. SCC is concerned that without such control pressures such as compressing the construction program may put pressure on the Applicant or their contractors to breach the accepted HGV trip rates.	

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Transport Assessment – Trip Generation				
3.10.45	Construction Workforce Trips	Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.4 (Construction Staff Overview) of the **7.11 Transport Assessment [Revision B]**. A **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** has been prepared as part of the DCO application and is contained as an appendix within the **7.3 Outline Construction Traffic Management Plan [Revision F].** The Outline CWTP will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate. The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** provides a monitoring framework, where the TPC will collate mode share and vehicle occupancy for staff travelling to site. The results of this survey will feed into the quarterly report issued to National Highways and the Local Highway Authorities. With the exception of the vehicle occupancy matter above (3.10.42), SCC have raised no further concerns. The Applicant is committed to continue discussions with SCC, which will likely	To be reviewed once final data provided in the application.	Under Discussion

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		conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
Transport Assessment – Conclusions				
3.10.46	Overall impact of the Project	The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of the **7.11 Transport Assessment [APP-333]**. The conclusions are considered appropriate.	Agreed.	Agreed
Outline Construction Traffic Management Plan (CTMP)				
3.10.47	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in Section 3 of the **7.3. Outline Construction Traffic Management Plan [Revision F]**. These are considered to be clear and sufficient for the delivery of the Project.	SCC agrees that these are considered clear and sufficient, albeit it shall be clear that the ultimate responsibility for oversight of the CTMP remains with NG.	Agreed
3.10.48	Pre-and Post Construction Surveys	Details of the proposed Pre and Post Construction surveys are set out in Section 5.2 of the **7.3. Outline Construction Traffic Management Plan [Revision F]** and connect to the mitigation measures detailed within the **7.2 Outline Code of** Construction **Practice [Revision G].** These pre- and post-construction surveys are considered appropriate for the Project. Section 5.2.2 of the **7.3 Outline Construction Traffic Management Plan [Revision F]** states that pre- and post-construction condition surveys of the existing highway network are proposed to be undertaken on AIL and HGV routes. The scope of these surveys (in terms	5.2.3 – SCC would welcome the opportunity to view the pre-condition survey when it is undertaken, not just following reinstatement. It may also be necessary to include secondary access routes, access routes for construction of accesses and cross overs and some diversion routes (both formal and informal). Experience as shown that even small numbers of vehicles using narrow minor roads can lead to disproportional damage to the highway.	Agreed

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		of the routes covered and the methodology of these surveys) is to be agreed with each LHA. The results of these pre-condition surveys will be shared with the LHA prior to works commencing, including pre-commencement works relating to the highway. In accordance with mitigation measure GG06 in the Outline CoCP (document reference 7.2), a record of condition will be carried out (photographic and descriptive) of the working areas that may be affected by construction activities. This record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the pre-condition survey. The specific locations of these record of conditions will be captured on a plan.		
3.10.49	Pre-and Post condition surveys	The Applicant agrees with SCC on this matter. AiL routes will be secured through the AiP and ESDAL process. The expectation for structural assessments along the AIL routes is that these will be completed by the Main Works Contractor(s) and agreed in principle with the asset owners prior to DCO determination. Post DCO determination, the Main Works Contractor(s) will confirm the final vehicle selection, origin location, and subsequent delivery route via the ESDAL (Electronic Service Delivery for Abnormal Loads) system, which will notify the various stakeholders, police forces and asset	5.2.1 – AIL routes will need to be reinspected prior to their use in case any structures have become unsuitable. SCC accepts that the Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy 3.5.9 secures a commitment to assess structures for AILs. The matter of reimbursement for LHA costs remains to be agreed (not in PP).	Under discussion

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		owners of the proposals. The use of the ESDAL system is secured within Paragraph 5.2.4 of **7.3 Outline Construction Traffic Management Plan [Revision E]**. If structural assessments confirm a structure is unable to accommodate the required AIL vehicles, the Main Works Contractor(s) will consider a range of engineering solutions or other measures such as strengthening of the existing structure, carriageway resurfacing or management of traffic speeds and flows. If there is still a residual issue, alternative AIL delivery routes avoiding those structures would be considered. The Applicant has included provisions in **3.1 Draft DCO [Revision G]** to enable the above measures to be implemented, including: • Article 11(2) street works • Article 19 agreements with street authorities • Article 21 protective works • Schedule 1 (list of associated development) • Schedule 16 protective provisions With the exception of reimbursement for LHA costs, covered under matters 3.10.52 and 3.10.74, SCC have raised no further concerns. On this basis, the Applicant proposes that this matter can be moved to Agreed.		
3.10.50	Traffic Management Measures	Details of the proposed traffic management measures are set out in Section 5.8 of the **7.3. Outline Construction Traffic Management Plan [Revision F]**.	SCC concerned about potential restrictions in 5.8.3 regarding cyclists and pedestrians being able to use closed roads. See also 3.10.43	Agreed

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		The Applicant is proposing a number of short duration road closures to facilitate the safe construction of bellmouths and highway works, and construction activities associated with underground cables and overhead line straining. Where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Alternatives for cyclist and pedestrian access will be considered in circumstances where safe operation of the works or the safe use by active travel users is compromised. Section 5.8 of the **7.3. Outline Construction Traffic Management Plan [Revision F]** has been updated to capture this commitment. The Applicant proposes that this matter can be moved to Agreed.	Accepted that measures proposed are acceptable subject to agreeing details for individual sites as part of the discussions at CTMP and technical approval stages.	
3.10.51	Implementation/ Enforcement	The implementation and enforcement process set out in Section 6 of the **7.3. Outline Construction Traffic Management Plan [Revision F]** is considered to be appropriate and adequate for the Project. The Applicant anticipates that the trip generation figures will form the basis of the monitoring and management mechanisms set out in **7.3 Outline Construction Traffic Management Plan [Revision F]**. The Main Works Contractor is expected to monitor the number of HGVs arriving to and departing from site from / to Primary Access Routes with the proposed	Under review. These will need to sufficient to demonstrate that during construction the impacts are not materially greater than those assessed on the ES or TA.	Under Discussion

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		implementation of a delivery management / scheduling system. The Main Works Contractor(s) are proposing to use a delivery management / scheduling system utilising Global Positioning System (GPS) technology. This will allow the Project's Transport Coordinator(s) to record and monitor the number of vehicles passing along the MRN and through junctions that were modelled within **7.11 Transport Assessment [APP-333]**. A quarterly report will be prepared by the Transport Coordinator(s) and shared with Suffolk County Council, with engagement on non-compliance or network issues. The Main Works Contractor will develop the Final CTMP(s) and confirm with the Local Highway Authorities. Non-conformance with the Final CTMP will be reported by the Environmental Clerk of Work(s) (EnvCoWs) and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or the Applicant will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. **7.3 Outline Construction Traffic Management Plan [Revision F]** is secured through Requirement 4 of **3.1 Draft DCO [Revision G].** Through the monitoring and management mechanisms proposed, the junction monitoring programme		

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		and potential delivery management/scheduling system will capture any increase in proposed construction traffic volumes. In the instance where vehicles volumes are higher than the assessed peak week for a consistent and prolonged period of time, the Applicant and the appointed Main Works Contractor will assess the trip generation for each specific location if required. In the instance where the reassessment highlights additional trips, the proposed mitigation measures could include: signal timing adjustments, additional signage, and potential restrictions in peak hours (where required and agreed with the Local Highway Authority). The **Outline Construction Traffic Management Plan [Revision F]** commits to including vehicle HGV numbers within the quarterly report. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.10.52	Monitoring and mitigation	The Applicant notes SCC's request for monitoring, mitigation and compensation for extenuating, unforeseen circumstances exceeding the worst-case assessments within the Environmental Assessment and Transport Assessment. The Applicant is unable to provide a commitment at this time but will continue to engage with SCC on this matter.	SCC has made its position clear on this matter that this is a necessary commitment to demonstrate that the assessments of the impacts of construction traffic remain reasonable and are not exceeded.	Under Discussion

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3.10.53	Controls	**7.3 Outline Construction Traffic Management Plan [Revision F]** provides details of the construction routeing strategy and working hours. HGV drivers not adhering to the agreed routes and operating outside the agreed hours are matters of non-compliance, that would follow the procedure detailed in Section 6.3 of **7.3 Outline Construction Traffic Management Plan [Revision F]**. The Applicant has undertaken a robust trip generation and assessment exercise for both the Overhead Lines and Cables and Substation construction activities. This has been calculated as a worst-case assessment, to be transparent in the expected trips along each construction route. The Applicant has stated within **7.3 Outline Construction Traffic Management Plan [Revision F]**, paragraph 5.4.17 '*Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary*'. The Applicant has also committed to monitoring and managing the Project's impact on the road network, with **7.3 Outline Construction Traffic Management Plan [Revision F]** stating that the Main Works Contractor(s) will be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road/Major Road network.	Understood Position from Relevant Representation November 2025: "SCC considers it would be appropriate for the Secretary of State to control numbers and routes of Heavy Goods Vehicles ("HGV") during the construction period as recommended in 5.14.14 of EN-1 Overarching National Policy Statement for Energy." Understood position from Local Impact Report: ***Construction Traffic Management and Travel Plan [APP-309]*** *– Controls* SCC would consider the appropriate controls reasonable i. HGV routes ii. HGV timing iii. Daily HGV cap iv. Peak hour cap v. With the following measured and reported vi. Worker numbers vii. Worker car occupancy (or worker trips)	Agreed

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		The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** provides a monitoring framework, where the TPC will collate mode share and vehicle occupancy for staff travelling to site. The results of this survey will feed into the quarterly report issued to National Highways and the Local Highway Authorities. The Applicant has clarified where the controls listed are secured and monitored above, with the exception of vehicle caps which is covered in the matter below. Therefore, the Applicant considers this matter to be Agreed.		
3.10.54	Controls - Vehicle Caps	The Applicant has stated within **7.3 Outline Construction Traffic Management Plan [Revision F]**, paragraph 5.4.17 '*Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary*'. The Applicant has also committed to monitoring and managing the Project's impact on the road network, with **7.3 Outline Construction Traffic Management Plan [Revision F]** stating that the Main Works Contractor(s) will be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road/Major Road network. **7.3 Outline Construction Traffic Management Plan [Revision F]** commits to	***Construction Traffic Management and Travel Plan [APP-309]*** – *Controls* SCC would consider the appropriate controls reasonable i. HGV routes ii. HGV timing iii. Daily HGV cap iv. Peak hour cap v. With the following measured and reported vi. Worker numbers vii. Worker car occupancy (or worker trips) Tthe lack oof a commitment to place a cap on HGVs in SCCs view undermines faith in the assessments. We have always been assured the assumptions represent a realistic worse case scenario and in this	Not Agreed

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		including vehicle HGV numbers within the quarterly report.	case don't see why they should ever be exceeded/	
Outline Construction Worker Travel Plan (CWTP)				
3.10.55	Policy	Whilst reference is not explicitly made to Suffolk's NSIP guidance document in the OCWTP, the OCWTP is considered to be in line with the SCC's Travel Plan guidance contained within cited document. The OCWTP itself identifies: • Car and LGV movements to and from site as the occupancy of vehicles and monitoring measures are proposed • Staff movements to and from site (mitigation is included to monitor staff arrivals and departure times) • Complaints procedure - detailed within the CTMP and the Community Liasion Role. • Car park occupation is being monitored by the TPC • Sustainable transport options are detailed within the CWTP for potential mitigation measures.	No reference to SCC Guidance for NSIPs https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters	Agreed
3.10.56	Site Accessibility Review	The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** was updated for the DCO submission in August 2025. This matter is discussed in Section 4 (Site Accessibility) of the **7.3**	Under review. Unsure how the references in the CWTP Table 4.1 relate to those found on the PAR plans, could we please have clarity on this?	Agreed

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		Outline Construction Traffic Management Plan [Revision F]. The references in the CWTP Table 4.1 (RG-SC02 etc) refer to the temporary construction compounds as listed in Table 4.7 of **6.4 Environmental Statement Chapter 4 – Project Description [Revision B]** and shown in **6.4 F1 Environmental Statement Figure 4,1 – Proposed Project Design [REP4-109].**		
3.10.57	Targets, Strategy, and Measures	Targets are set out within Section 6 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** (Appendix B of the **7.3. Outline Construction Traffic Management Plan [Revision F]**). Strategy and Measures are set out within Section 8 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C].** The construction targets set out are considered to be relevant and achievable, given the present stage of Project development. The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project. Updated Position (February 2026) **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]** was updated for the DCO submission in August 2025. These	Under review. Accepted with the exception of vehicle occupancy – see 3.10.42 and comments about monitoring and reporting of the effectiveness of these measures to the LHA/LPA	Agreed

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		matters are discussed in Section 5 (Targets) and Section 7 (Travel Plan Strategy and Measures) of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [Revision C]**.		
3.10.58	Monitoring and Review	**7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [Revision C]** includes information on how the Main Works Contractor(s) and the Travel Plan Coordinator (TPC) will capture the level of staff arriving by car and non-car modes, and changes in staff arrival and departure times. It is anticipated that these measures combined will report the worker numbers and the worker car occupancy. The mode capturing is anticipated to include Car Driver and Car Passenger, so a car occupancy factor can be derived. The information will be shared with Suffolk County Council on a quarterly basis. This is considered to be suitable and appropriate, given the present stage of Project development.	Under review. Accepted with the exception of vehicle occupancy – see 3.10.42 and comments about monitoring and reporting of the effectiveness of these measures to the LHA/LPA	Agreed
Construction Access Strategy and Design				
3.10.59	Construction Access Approach	The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within Section 5 of the **7.3. Outline Construction Traffic Management Plan**	Agreement in principle but subject to understanding the final volumes of construction traffic stated within the application. The approach of using PARs with the access to the site via haul roads is accepted.	Agreed

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		[Revision F]. This approach is considered to be suitable for construction traffic for the Project. The Applicant will continue to engage with SCC on this matter.		
3.10.60	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Construction Access Plans within Appendix C of the **7.3 Outline Construction Traffic Management Plan [APP-312 to APP-314, REP4-172, APP-316 to APP-319, REP4-173 inclusive]**. These have been discussed with Suffolk County Council during regular engagement meetings since September 2023. These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the **7.3. Outline Construction Traffic Management Plan [Revision F]**.	Agreement in principle but subject to understanding the final volumes of construction traffic stated within the application. Whilst SCC (Highways) acknowledges that the Applicant has proposed mitigation, the Council has residual concerns with how this will work in practice. However, SCC hopes that the positive working relationship with National Grid on this project continues and that if any issues arise then they will work with the LHA to resolve them.	Agreed
3.10.61	Construction Access and Crossover Design	Preliminary designs of each of the proposed Site Access Points and Site Crossover points have been developed and represent adapted versions of the indicative **2.6.3 Design and Layout Plans – Traffic and Transport [APP-043]**. The design of each of the proposed Site Access Points and Site Crossover Points is based on site specific data and considerations which consider both Design Manual for Roads and Bridges design standards, and the anticipated design vehicles using these access and crossover points. Site specific requirements have utilised high density LiDAR data to verify vertical constraints	Under review. On site surveys will be required to check actual site conditions particularly visibility, road widths and geometry. ***Understood Position from Response to January 2025 Draft SoCG:*** SCC email 4th Nov 2024 - Transport – concern over consultant's reliance upon a generic access design SCC accept that the information and high-level design provided in the DCO is proportionate at this stage. However, the authority reserves the digression to refuse to	Agreed

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		to the junctions and their visibility splays, and where identified, the Order Limits have been refined to accommodate potential works to mitigate 3D constraints. This includes allowance for earthworks and drainage. This level of design is considered appropriate for preliminary designs. Topographic survey will be used by the Main Works Contractor to inform the detailed design. Detailed designs will also show the highway boundary and any land proposed to be adopted by the Local Highway Authority. Stage 1 Road Safety Audits (RSA) were completed for the proposed site access locations to further investigate on visibility, road geometry and width matters. SCC was provided an opportunity to raise site specific concerns in the drafting of the RSA Designers Response Reports. The updated Designers Response Reports are to be issued to SCC after The Main Works Contractor (MWC) will carry out the detailed design of proposed site access points, which will be subject to the associated stages of road safety audit, as well as further discussion with SCC. The Applicant has committed to undertaking a joint site visit with the Main Works Contractor(s) and Suffolk County Council to review actual site conditions.	issue technical approval of the detail design in cases where actual conditions do not allow design of safe access or unacceptable compromises are sought. For example, suffice land is available to create widening on the B1113 with appropriate edge support, drainage, utility diversion and visibility. Move to accepted.	
3.10.62	Highway Mitigation Design	Mitigation measures proposed on the Public Highway are described in Section 5 of the **7.3. Outline Construction Traffic Management**	SCC reviewing information provided within the DCO application.	Agreed

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		Plan [Revision F], and are further set out in the following **3.1 Draft DCO [Revision G]**: • **Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout.** • **Schedule 6, Part 2 - Street Subject to Temporary Alteration of Layout.** These are considered to be suitable and sufficient for the delivery of the Project. Where measures have been identified which may require works outside of the Public Highway (categorised as 'Red' mitigations under Section 5.9 of the **7.3. Outline Construction Traffic Management Plan [Revision F]**), specific designs have been developed for these locations. These designs were discussed with Suffolk County Council during an engagement session in April 2025, and further to this Stage 1 Road Safety Audits have been undertaken for each location, overseen by Suffolk County Council. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with Suffolk County Council as the Overseeing Authority. The Applicant will continue to engage with SCC on this matter.	Accepted as proportionate and subject to deliverability as stated in 3.1.59 above.	
3.10.63	Traffic Management	The schedules in the **3.1 Draft DCO [Revision G]** make reference to streets as recorded in the National Street Gazeteer (NSG).	Under review. All references to streets must be those in the street gazetteer https://www.findmystreet.co.uk/	Agreed

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		The preliminary design of proposed site access points have been subject to Stage 1 Road Safety Audits (RSAs). As part of this process, speeds surveys were commissioned and 85th percentile speed data obtained near proposed site access. The 85th percentile speeds were used to understand driver behaviour at the current posted speed limits, and predict the likelihood of speed compliance under proposed temporary speed reductions. The Design Organisation responses to the audit findings have provided flexibility for the Main Works Contractor in the selection of traffic management measures. Further details of traffic management is to developed at the detailed design stage by the Main Works Contractor (MWC) and will be subject to the associated stages of RSA and discussions with SCC. The Applicant has committed to undertaking a joint site visit with the Main Works Contractor(s) and Suffolk County Council to review locations where additional speed management or controls may be required.	Implementation of speed reductions should not be taken as delivering the posted speeds and using these as the design criteria. Additional speed management or controls may be required to ensure compliance with speed limits.	
3.10.64	Traffic Regulation Orders and Temporary Traffic Regulation Orders	The schedules in the **3.1 Draft DCO [Revision G]** make reference to streets as recorded in the National Street Gazeteer (NSG). Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the **2.4 Traffic Regulation Order Plans [APP-025 to APP-**	Under review. All references to streets must be those in the street gazetteer https://www.findmystreet.co.uk/ SCC will be expecting justification for the necessity of such traffic orders and an understanding on how they will be implemented and any consequential impacts	Agreed

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		032], and set out in Schedule 13 of the **3.1 Draft DCO [Revision G]**: • **Part 1 - Temporary Restriction of Waiting and Restriction of Speed.** • **Part 2 - Permanent Restriction of Waiting and Restriction of Speed.** • **Part 3 – Temporary Restriction of Access.** • **Part 4 – Temporary no Overtaking Order.** The TROs proposed are necessary to enable the safe construction of the Project, and safe operation at permanent road features. The activities where TROs are required include: • Highway mitigation works • Site access points and crossover points • Netting activities to enable overhead line stringing • Trench crossings for underground cables • AIL routing constraint sites The works programme is yet to be finalised, so the durations of all TROs are unable to be confirmed at this time. The proposed TROs listed in Schedule 13 of **3.1 Draft DCO [Revision G]** are intended to be worst-case scenarios, and the Main Works Contractor may elect to reduce the number, type or extent of them. The Applicant will continue to engage with SCC on the justification for each TRO and	on the fabric of the highway (e.g. removal of road markings). The principle is agreed but a number of details need to be agreed prior to commencement. These are Duration of the restriction justified by the construction program to prevent avoidable delays being inflicted on road users and communities. The scope and methodology for notifying interested parties committed to in the OCTMP is agreed with the LHA when finalising the CTMP. Access for residents, emergency services, refuse collection, public transport and NMUs maintained as much as reasonably practical Signs placed for longer that 6 months are placed on posts, not A frames to reduce maintenance problems. Where temporary road markings are placed on the highway and removed the Applicant makes good the surface. Minor roads are commonly surface dressed, and removal of road markings commonly damages significant areas of the surface.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		the implementation and consequential impacts processes.		
3.10.65	Diversion Routes	Diversion routes for temporary road closures are presented in **2.5 Access, Rights of Way and Public Rights of Navigation plans [APP-033 to APP-034, REP4-019, APP-036 to APP-38, REP5-031, REP4-020]**. The **7.3 Outline Construction Traffic Management Plan [Revision F]** Section 5.8 states that where diversions are necessary, they will adopt the principle that they will use the same standard of road or higher, where practicable and available. All works will be coordinated with SCC by the Main Works Contractor through the use of the Permit Scheme. The requirement to close a road would only be in the worst-case scenario where the Contractor's phasing of works requires it. Ordinarily any works in or over the public highway could be undertaken and managed safely through local short term Traffic Management. The Applicant acknowledges that the specific diversion routes may not have all been agreed with the Highway Authority. However, the design approach taken has been to identify equivalent or better routes where available. The Applicant continues to engage on this matter with the Local Highway Authority. The diversion route onto Wickham Lane has been reviewed, and an alternative diversion route could be considered by the Applicant	Understood position from Local Impact Report: The diversion routes in **2.5 Access Rights of Way and Public Rights and Navigation Plans [APP-034]** and **[APP-035]** have not been agreed with the Highway Authority. Some, such as diversion onto Wickham Lane, Wickham is unsuitable due to the acute angle of vehicles turning into and out of Wickham Lane, in addition to the fact that Wickham Lane is not the same road category as Wickham Road. Propose that diversion routes for temporary road closures are approved as part of the permit process.	Under Discussion

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		and their Main Works Contractor through further engagement with the 'SCC's Network Assurance Team as the traffic management measures and Traffic Regulation Order proposals are further developed. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		
3.10.66	Highway Mitigation Design on National Highways Infrastructure	Further to Matter ID 3.10.62 (Highway Mitigation Design), it has been identified that one proposed mitigation within Suffolk impacts primarily upon the Strategic Road Network (SRN) managed by National Highways. This is located at Junction 31 of the A12 and is described in Section 5.9 of the **7.3. Outline Construction Traffic Management Plan [Revision F]**. On the basis that this proposed mitigation impacts principally upon the network managed by National Highways, it is considered appropriate for National Highways to be the Overseeing Authority for the Road Safety Audit in this location.	Agreed, although any work on the local road network beyond the SRN boundary will require approval from the LHA (e.g. A1214).	Agreed
3.10.67	Provision of suitable HGV facilities	As noted in TT1.34 **8.9.1 Applicant's Response to First Written Questions [REP3-074]** The Applicant has provided information in the Project Description, Construction Traffic Management Plan on the facilities proposed at site compounds.	Understood position from Local Impact Report: Experience from data with SZC and EA2 is that significant pressure is being put on the capacity of laybys and rest areas for HGVs leading to complaints from both local residents and hauliers. There is a shortage of welfare facilities for HGV	Agreed

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		As detailed in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], the Applicant is proposing a number of types of temporary construction compounds for the Project. These include Main Works compounds, satellite compounds and primary compounds which would allow for deliveries, material storage and welfare facilities. Highway mitigation compounds (where material laydown areas are proposed) would also include welfare facilities and vehicle parking. Construction laydown areas are proposed to store stone and other materials to facilitate the construction of the Project. The Main Works Contractor(s) will provide welfare vans and vehicle parking on these sites, where alternative provisions are not available. A detailed Construction Traffic Management Plan (CTMP) will be developed post consent under Requirement 4 of Schedule 3 to **3.1 Draft DCO [Revision G**. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will be encouraged to use welfare facilities on-site. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access	drivers, and the Applicant is strongly recommended to provide such facilities and parking for legal breaks at all large site compounds.	

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		to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site. As noted in paragraph 2.3.6 of **7.3 Outline Construction Traffic Management Plan [Revision F]**, unless otherwise agreed with the Local Highway Authority (LHA), any HGVs which are projected to arrive on site prior to 07:00 would be required to park at an appropriate lorry park, services or other designated overnight parking locations until they can complete their journey within the appropriate restrictions. These locations would be agreed with the relevant LHAs prior to the commencement of construction and would be communicated to drivers within their delivery instructions. The Main Works Contractor(s) is expected to monitor the number and timing of HGVs arriving to and departing from site from/to Primary Access Routes with the proposed implementation of a delivery management/scheduling system. As noted in paragraph 2.14.3 of **7.11 Transport Assessment [APP-333]**, site access point layouts are designed to allow for two-way HGV movements to occur, i.e. an HGV can enter the site access point while a second HGV is waiting to exit. A number of matters have been defined as non-compliance to ensure that the CTMP is effectively enforced within Section 6.4 of **7.3 Outline Construction Traffic Management**		

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Plan [Revision F]. HGV drivers parking or waiting on the highway in inappropriate locations which could result in highway safety issues is defined as a matter of non-compliance. All incidents associated with the construction of the Project, including non-conformance with the CTMP, will be reported by the Environmental Clerk of Works and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or the Applicant will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. Where a corrective action is identified, the LHA will be informed. Data recorded from the non-compliance procedure will be collated on a quarterly basis and will be issued out to the relevant parties, including LHAs.		
3.10.68	Network management	The Applicant has developed **7.3 Outline Construction Traffic Management Plan [Revision F]**, which sets out the proposed approach to monitoring and maintenance of the public highway on routes impacted by construction traffic, which includes the undertaking of pre- and post-condition surveys, with remedial works to be agreed with relevant highway authorities. This document also sets out anticipated hours for HGV deliveries, with the caveat that certain specified activities may be undertaken outside of these	Understood position from Local Impact Report: Impacts on network management during the construction phase will include: i. The intended DCO powers in article 11 may inhibit the authority in performing its duties as the local highway authority by removing control on the highway within the 'works' or associated with implementation of the traffic regulations in article 49.	Under Discussion

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		core hours, which includes the undertaking of highway works requested by the highway authority. The Applicant and any appointed Main Works Contractor(s) will continue to engage with Suffolk County Council with respect to monitoring and any required remedial works relating to the Public Highways. Requirement 7 of the **3.1 Draft DCO [Revision G]** details that 'Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority'. HGV movements to site are intended to be deliveries, unless associated with material removal. HGVs will not remain on site from a delivery, as a result every delivery is a two-way movement. The **7.3 Outline Construction Traffic Management Plan [Revision F]** states that construction traffic operating outside of the agreed hours is a matter of non-compliance. Therefore, all HGV movements on the primary access routes are controlled by the Construction Traffic Management Plan irrespective of whether they are delivering material to or from site. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.	ii. The presence of construction traffic on the network for 7 days a week will hamper routine highway maintenance or increase delays and disruption. The authority may also incur increase costs if forced for operational or safety reasons to undertake more work outside normal working hours. Whilst HGV movements are restricted in Requirement 7 it should be made clear this is for two-way movements not just for deliveries. The delivery times are acceptable to SCC. However, as noted in the LIR the presence of construction traffic on the network and / or temporary road closures or other restrictions may require the highway authority to undertake maintenance works outside its normal core working hours (i.e. Mon-Fri 0700-1700). In such cases SCC would expect the Applicant to co-operate with the authority to avoid this r, if not possible, to compensate the authority for any additional costs incurred, for example working outside core hours.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
Abnormal Indivisible Load (AIL) Access				
3.10.69	Abnormal Indivisible Load (AIL) Access Approach	The **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** details the processes and proposed routes for AIL movements. The schedule of AIL movements is anticipated to be further developed and shared with the LHAs when appropriate, following confirmation of the construction program by the Main Works Contractor(s). The formal notification of AIL movements will follow the Electronic Service Delivery for Abnormal Loads (ESDAL) system and will follow all formal processes. The Applicant is engaging with the police force, assisting with information exchanges in terms of indicative volumes of AIL movements, and indicative programme dates, to help inform the force planning in movement of these vehicles.	Under review. Suffolk Constabulary is responsible for routing loads with regard to width and length. Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy provides a acceptable process to identify potential routes and validate them in advance of any movements. Caution is advised on replying on ESDAL as this can lead to refusal for one or multiple routes if weight exceeds the assessed capacity oof any structure on that route. Early engagement is vital, particularly if the whole operation is subcontracted and falls outside the Applicants control.	Agreed
3.10.70	Abnormal Indivisible Load (AIL) Access Routes	Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** (Appendix A of the **7.3. Outline Construction Traffic Management Plan [Revision F]**). These have been developed following consultations with Suffolk County Council and Suffolk Constabulary. As part of these consultations, draft route information was	Under review. Suffolk Constabulary is responsible for routing loads with regard to width and length. As 3.10.6 above noting the LHA is mainly concerned with approving routes in relation to weight. Height, width and length are Suffolk Constabulary matters albeit the LHA may be required to modify street furniture to allow movements.	Agreed

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		shared in July 2024 and April 2025. The Applicant will continue to engage with Suffolk County Council as the proposed AIL access routes are developed further, including with respect to the ongoing structural investigations.		
3.10.71	Abnormal Indivisible Load (AIL) Structural Investigation methodology	Routes proposed to be utilised by AILs are shown in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** (Appendix A of the **7.3. Outline Construction Traffic Management Plan [Revision F]**). Specific concerns raised by Suffolk County Council in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the **AIL Access Strategy [APP-310]** (**Appendix A of** the **7.3. Outline Construction Traffic Management Plan [Revision F]**). The relevant process is set out within Section 6 of the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** (Appendix A of the **7.3. Outline Construction Traffic Management Plan [Revision F]**). This approach is considered to establish in principle that the proposed AIL deliveries required for the Project are feasible, and that a suitable process is being undertaken in order to facilitate the anticipated formal AIL movement applications anticipated during construction of the Project.	Under review. SCC has developed a process for review, inspection and assessment of highway structures to confirm suitability for STGO or Special Order AIL movements, and this will be shared with the Applicant. Methodology of structural review is yet to be agreed. SCC note that having a process in parallel to the DCO introduces an element of risk that structures are identified that cannot accommodate AILs and that the route is unviable. SCC will require the applicant to demonstrate that any route is feasible in terms of the capacity of highway structures noting that some on the network have restrictions in terms of Special Type General Order and Special Order (STGO/SO) loads.	Agreed

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		The AIL applications submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangements to accommodate the movements with minimal impact on the network. The AIP process has now been agreed between The Applicant, SCC and The Main Works Contractor(s).		
3.10.72	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Construction Access Plans within Appendix C of the **7.3. Outline Construction Traffic Management Plan [Revision F]**. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 3.10.62) and are considered to be suitable and sufficient for the delivery of the Project. Management measures relevant to AIL movements are discussed within Section 5.9 of the **7.3. Outline Construction Traffic Management Plan [Revision F]**, and Section 6 of the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** (Appendix A of the **7.3. Outline Construction Traffic Management Plan [Revision F]**). This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.	Under review. Mitigation can only be finalised following structural investigations (3.10.48). SCC accepts that the Applicant has been pro active in its engagement with the authority on this matter. The matter is agreed but with the awareness that the capacity of a structure may change in the future or as a result of the current surveys. SCC cannot guarantee that structures will not deteriorate and restrictions may be imposed in the future. In this case mitigation or improvement may be required to enable heavy loads to use a route.	Agreed

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		All but one structural assessment have been completed, with reviews of these assessments currently being undertaken by SCC. The Applicant will continue to engage with SCC on this matter, noting that AIL routes and structural mitigation will be agreed as part of the ESDAL process, as committed ot in the CTMP.		
3.10.73	Abnormal Indivisible Load (AIL) permanent route resilience	The Applicant recognises the concerns around long term AIL route resilience and is considering the request made by Suffolk County Council for provision of long-term routes by investment in permanent improvements to highways structures, whilst mindful of its regulatory duties and that the Applicant is one of a number of developers making use of highway infrastructure in the area. The Applicant welcomes further dialogue to understand the specifics of SCC's concerns about the resilience of routes. National Grid considers that this matter is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. National Grid commits to continue to engage on this matter with SCC outside of the development consent process.	Understood position from Local Impact Report: AIL access from port to site. Lack of resilient routes without temporary Infrastructure. Required mitigation: Provision of long-term route by investment in permanent improvements to highway structures.	Under Discussion
Legal Agreements				
3.10.74	Legal Agreement	The Applicant is negotiating with Suffolk County Council a Framework Highways Agreement/Protective Provisions and expects	SCC continues to engage on this matter.	Under discussion

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		the details of these to be agreed by the end of DCO examination.		

3.11 Public Rights of Way (PRoW)

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
PRoW				
3.11.1	PRoW Separate Chapter	As per the **6.19 Scoping Report Appendix A [APP-288 to APP-296 inclusive] and** including Appendices B to K **[APP-296]** and the **6.20 Scoping Opinion [APP-297]** a separate PRoW chapter has not been provided. This is because PRoWs are assessed using different methodologies by several different environmental topic chapters. PRoWs are assessed separately within each relevant environmental topic chapter, and cumulative effects on a single PRoW are presented within the **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. In addition, the **7.6 Outline Public Rights of Way Management Plan [Revision D]** has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project. This is developed as a standalone document and it is expected that the final PRoW Management	SCC would have welcomed a separate chapter to enable SCC PRoW to fully understand the cross-discipline effects. Having PRoW matters spread over many disciplines makes it less effective and efficient to comment on impacts on the proposals with regards to PRoW.	Not Agreed

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		Plan, to be developed by the Main Works Contractor ahead of the commencement of construction activities, will also be a standalone document.		
3.11.2	Types of PRoW	Section 8.5 of the **7.6 Outline Public Rights of Way Management Plan [Revision D]** lists the long distance promoted routes and circular routes affected by the Project. For trails and routes that run along a PRoW, these will be managed as set out within Section 8.7.	Long distance promoted routes, and circular routes should also be included in the list to be assessed. These can be found on the Discover Suffolk website. SCC confirms that the all promoted routes and trails are in Section 8.5 of the **7.6 Outline Public Rights of Way Management Plan [REP5-163].**	Agreed
3.11.3	Proposed Management Regime Approach	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in the **7.6 Outline Public Rights of Way Management Plan [Revision D]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. Any temporary closures will be kept as short as practicable within the constraints of the works, and all temporarily affected PRoWs will be reinstated as soon as	Although the latest PROW MP has yet to be agreed, this matter has been sufficiently addressed.	Agreed

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		practicable. The indicative durations of temporary closures are identified in the **7.6 Outline Public Rights of Way Management Plan [Revision D]**. Whilst the intention is to reinstate any affected PRoW to its original line and condition once construction is complete, and to remove any temporary mitigation, there may be opportunities for certain temporary measures to be retained as permanent improvements, subject to the agreement of the relevant Local Highway Authority and landowners. The latest version of **7.6 Outline Public Rights of Way Management Plan [REP5-163]** was made available at Deadline 5.		
3.11.4	Routes with Public Access Affected by the Proposed Development	Routes with public access affected by the proposed development are shown in the **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]**. Details of proposed management measures for each impacted route are shown in Section 4 of the **7.6 Outline Public Rights of Way Management Plan [Revision D]**. These are considered to be suitable, in line with the Proposed Management Regime Approach **(ID 3.11.3**) set out above. The latest version of **7.6 Outline Public Rights of Way Management Plan [REP5-163]** was made available at Deadline 5.	SCC considers that the plans referenced by the Applicant cover the physical features and impacts to PROW, however, notes that there is no content on visual matters which the Council finds disappointing.	Agreed

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3.11.5	Reinstatement Approach	Pre-condition surveys and post-construction site conditions surveys are part of the environmental commitments and mitigation measures listed in the **7.2 Outline Code of Construction Practice [Revision G]**. The **7.6 Outline Public Rights of Way Management Plan [Revision D]** confirms that pre-commencement condition surveys for Public Rights of Way affected by the Project, will be undertaken by the Main Works Contractor in conjunction with the relevant LHA PRoW Officer, or other suitable LHA representative and that the surveys will be shared with the LHA. Reinstatement will be to the reasonable satisfaction of the LHA PRoW Officer.	SCC agrees.	Agreed
3.11.6	PRoW Strategy	An assessment of the impact of the Project on physical activity during the construction phase is presented in **6.10 Environmental Statement – Chapter 10 Health and Wellbeing [Revision D]**. The assessment concludes that, although physical activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the effect of the Project on physical activity is considered to be not significant for both	A robust PROW strategy will be required to mitigate the impacts of construction on PROW including diversions, closures, and amenity. Further assessment work is required on the impacts of traffic and transport including for cumulative effects and improved methodology. SCC considers that the PROW MP, when agreed, may cover this and it will be agreed at that stage.	Under Discussion

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		the general population and vulnerable groups. Cumulative effects are considered in **6.17 Environmental Statement Chapter 17-Cumulative Effects [Revision B]**. Where other development presents a potential inter-project cumulative effect in relation to specific PRoWs, appropriate PRoW management measures (for example diversion routes) would be implemented to minimise disruption to physical activity. The Applicant confirms that **7.6 Outline Public Rights of Way Management Plan [Revision D]** has been prepared and submitted as part of the Development Consent Order application. This sets out the strategy for managing Public Rights of Way (PRoWs) during construction, including arrangements for temporary closures and diversions. The **7.6 Outline Public Rights of Way Management Plan [REP5-163]** was updated at Deadline 6 to reflect comments made by SCC at Deadline 5, and will be further updated at Deadline 7 **[Revision D]** to address the latest comments made by SCC at Deadline 6, as well as those made as part of the ongoing engagement with SCC. In accordance with Requirement 4 of the **3.1 Draft DCO [Revision G]**, a final PRoW Management Plan will be developed by the appointed Main Works Contractor prior to the commencement of each stage of the authorised development, in consultation		

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		with the Local Highway Authority. The assessment for the pedestrian, cyclist and horse-rider delay on PRoWs is presented in Table A16.4.3 of the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** includes an inter-project assessment of potential in-combination effects arising from the Project and other developments planned in the area. Paragraph 17.5.66 concludes that there is likely to be an inter-project cumulative effect on PRoWs, footpaths and bridleways; however, it is noted that other developments would apply PRoW management measures to minimise disruption, including diversions and as such it is anticipated that the cumulative effects would be negligible and not significant on recreational routes. The Applicant is committed to continue discussions with SCC, which will likely conclude after the finalisation of this SoCG. On this basis, this matter is retained as Under Discussion.		

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3.12 Cumulative Effects

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Cumulative Effects

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.12.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [Revision B]** and Section 17.2 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	The policy and legislation detailed and implemented within the ES are considered appropriate in their breadth and content.	Agreed
EIA – Approach and Methods				
3.12.2	Study area	The study area was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**.	SCC generally agrees that the data sources collected are sufficient to inform the assessments.	Agreed
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through **6.19 Scoping Report [APP-288 to APP-296]** and **6.20**	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

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		Scoping Opinion [APP-297] received from the Planning Inspectorate.		
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.6 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. The key parameters and assumptions presented are considered appropriate.	SCC agrees with the key parameters and assumptions.	Agreed
EIA – Baseline Conditions				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters (**Chapters 6 – 16** of the **ES [APP-138 to APP-280]**). The baseline conditions and receptors presented are considered appropriate.	SCC agrees with the baseline conditions and receptors.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.12.7	Embedded mitigation	The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (**Chapters 6 – 16** of the **ES [APP-138 to APP-280]**). Embedded mitigation measures, designed as an inherent part of the Project are set out in the environmental topic chapters of the **ES [APP-138 to APP-280]**. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC considers that further embedded mitigation may be required. SCC has outlined its preferred alignment amendments, which could have been pursued as mitigation for impacts experienced in particular localities. These were outlined in Item 5 of SCC's Post-Hearing Submission for ISH1 **[REP1-177]**. SCC considers that NGET's position is contrary to ongoing discussions regarding a S106 Schedule to address this matter of necessary compensation. SCC has stated its position in ExQ2 GEN2.2 **[REP5-271]** and	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Compensation is considered separately to mitigation within this SoCG. The Applicant however does not consider its position to be contradictory and has set out the approach being taken to landscape compensation as a result of Action Point 27 from ISH2 in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199]** and most recently in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**, which is summarised in row 3.2.13 above. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	the Applicant's proposed Masterplans, as submitted to respond to AP27 of ISH2 **[REP5-199]**, to be a sufficient starting basis for agreement.	
3.12.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (**Chapters 6 – 16** of the **ES [APP-138 to APP-280]**). Standard mitigation measures to reduce potential effects during construction are summarised in the environmental topic chapters of the ES **[APP-138 to APP-280]** and set out in **7.2 Outline Code of Construction Practice [Revision G]**. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	SCC considers that further standard mitigation may be required. SCC has outlined its preferred alignment amendments, which could have been pursued as mitigation for impacts experienced in particular localities. These were outlined in Item 5 of SCC's Post-Hearing Submission for ISH1 **[REP1-177]**. SCC considers that NGET's position is contrary to ongoing discussions regarding a S106 Schedule to address this matter of necessary compensation. SCC has stated its position in ExQ2 GEN2.2 **[REP5-271]** and the Applicant's proposed Masterplans, as submitted to respond to AP27 of ISH2	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		Compensation is considered separately to mitigation within this SoCG. The Applicant however does not consider its position to be contradictory and has set out the approach being taken to landscape compensation as a result of Action Point 27 from ISH2 in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199]** and most recently in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**, which is summarised in row 3.2.13 above.	**[REP5-199]**, to be a sufficient starting basis for agreement.	
3.12.9	Additional mitigation	The consideration of additional mitigation measures is presented in Sections 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision B]**. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Updated position presented in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**. At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out	SCC considers that additional mitigation measures beyond those identified in ES chapters should have been identified. In particular, in regard to Landscape and Visual impacts in the immediate vicinity of the Bramford Substation. SCC provided the following comments in their relevant representations dated 27 November 2025: Table 17.3 acknowledged that for some groups, the cumulative effect of noise, visual, and access impacts is considered significant: "Owing to the significance of visual effects within 500 m of the Order Limits, and as further mitigation is unlikely to be practicable, it is anticipated that the residual cumulative effect of visual and noise amenity effects with access and delay effects would lead to a significant intra-project cumulative effect on pedestrians, cyclists and horse riders.	Not Agreed

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		proposed mitigation, in an Environmental Statement (ES) in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in a number of documents including **5.1 Consultation Report [Revision B]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project. Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals for rationalisation and undergrounding of several sections of existing 132kV overhead line together with careful consideration of the routeing of the proposed 132 kV underground cables and 400 kV overhead line into and out of the substation. The Applicant recognises concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. An assessment of Cumulative Effects has been undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297] and** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]**. This includes an assessment of cumulative	However, the significant effects are no greater than reported in Chapter 13: Landscape and Visual". No additional mitigation measures are proposed within the chapter beyond those already identified in the other topic chapters.262. **Recommendation:** Given that the chapter concludes further mitigation is "unlikely to be practicable," it is recommended that the Applicant continues to engage proactively with affected communities, particularly those within 500 m of the Order Limits to monitor the real world impacts on pedestrians, cyclists, and horse riders. The Applicant should remain open to implementing targeted, site specific measures or enhancements if significant adverse effects are observed during construction or operation, even if these go beyond standard mitigation. SCC has outlined its preferred alignment amendments, which could have been pursued as mitigation for impacts experienced in particular localities. These were outlined in Item 5 of SCC's Post-Hearing Submission for ISH1 **[REP1-177]**. SCC considers that NGET's position is contrary to ongoing discussions regarding a S106 Schedule to address this matter of necessary compensation. SCC has stated its position in ExQ2 GEN2.2 **[REP5-271]** and	

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		landscape and visual effects around Bramford Substation including the Bramford to Twinstead Project. Significant cumulative landscape and visual effects are recognised. **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision D]** sets out the communications channels and approach to community engagement during the construction of the Project. **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** concluded that further mitigation to reduce the significance of effects was considered unlikely to be practicable, therefore no further mitigation other than that proposed within **7.6 Outline Public Rights of Way Management Plan [Revision D]** is proposed. Compensation is considered separately to mitigation within this SoCG. The Applicant however does not consider its position to be contradictory and has set out the approach being taken to landscape compensation as a result of Action Point 27 from ISH2 in **8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199**] and most recently in **8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]**, which is summarised in row 3.2.13 above.	the Applicant's proposed Masterplans, as submitted to respond to AP27 of ISH2 **[REP5-199]**, to be a sufficient starting basis for agreement.	

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
EIA – Assessment Conclusions				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]**. The assessment of effects during construction presented is considered appropriate. Cumulative effects on local employment are set out in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [Revision B]**. The anticipated construction employment would be minimal, of approximately 4,800 throughout the four-year construction period, with an estimated peak of up to 1,720 workers per day across the 180 km route of the Project (including approximately 90% non-local workers). Therefore, the potential cumulative effect is anticipated to be not significant. As outlined in Section 3.5 above, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision C].** However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities	SCC has major concerns regarding the conclusions of the cumulative impact assessment. For instance, in regard to construction workforce the assessment concludes a negligible and not significant inter-project cumulative effect on the local economy and local employment. Norwich to Tilbury will experience a temporal overlap with the construction workforces with Sizewell C, Sea Link, and multiple offshore wind projects. This will result in intensive competition for specialist skills in the region. SCC is of the view that the workforce displacement and labour market pressures should be attributed significant and major adverse impacts. SCC provided the following comments in their relevant representations dated 27 November 2025: • Paragraph 17.4.22 explains that "No monitoring is proposed during construction or operation (and maintenance)." This appears a notable gap given the potential for significant combined impacts on physical activity, mental wellbeing, and community amenity: **Recommendation**: Public Health recommend targeted monitoring of health and wellbeing outcomes for affected communities is undertaken, especially where	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through transparent engagement with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision D]** sets out the communications channels and approach to community engagement during the construction of the Project. *The Applicant recognises that people have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area and that adverse effects on mental health and wellbeing are likely to be relevant as a result of the scale of other developer (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during construction periods. However, the Applicant*	significant cumulative effects are identified. Processes should be put in place and documented to communicate and engage with users of PRoWs, schools, and community facilities to ensure timely information about closures, diversions, and mitigation measures. Additionally, The Applicant should proactively distribute mental health resources (e.g. WellMinds https://simplebooklet.com/wellmindssuffolk#page=1) provide funded Mental Health First Aid training for community members, and support local mental health organisations to mentor volunteers, as recommended in the Suffolk County Council Community Engagement and Wellbeing SGD. Public Health considers that further mitigation is required in respect of both intra and inter related cumulative effects on community mental health and wellbeing arising from the combined and prolonged interaction of construction activities and associated impacts, including extended working hours, repeated access disruption, noise, vibration and progressive landscape change throughout the delivery of the Project. Whilst individual effects may not reach significance in isolation, their temporal overlap and sustained nature over the construction period have the potential to give rise to chronic stress, sleep disturbance, reduced opportunities for respite and diminished quality of life, particularly for older residents	

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		does not consider that holding specific mental wellbeing impact workshops would raise new or additional information to that presented in ***6.10 Environmental Statement Chapter 10 – Health and Wellbeing [*****Revision B*****]****. Measures to alleviate concerns about cumulative impacts will be focused on effective community communication and liaison for individual development proposals, ensuring that relevant communities clearly understand timelines and the nature of construction activities. Where further engagement may be beneficial relates to awareness-raising about electric and magnetic fields (EMFs) and proposals for targeted community engagement in relation to this matter (to allay concerns) are set out in response to written question HWB 1.3 in* ***8.9.1 Applicant's Responses to First Written Questions [REP3-074]****.* With regard to communications on Public Right of Way (PRoW) closures, diversions and associated mitigation, **7.6 Outline Public Rights of Way Management Plan [Revision D]** sets out the measures that would be put in place to inform the Local Highway Authority and those who may be affected. These measures include advance notification of the timing and duration of any closures or diversions through on-site signage, notices and clear waymarking of diversion routes. Advance signage will include relevant mapping and contact details for further information	and others who may be more sensitive to environmental change. The current mitigations do not adequately address this cumulative pathway, nor do they offer a structured mechanism to detect and respond to emerging wellbeing impacts. Additional mitigation should therefore include a proportionate Mental Health and Wellbeing Monitoring Plan covering construction and early operation. Another aspect which bolsters the necessity of a monitoring plan is potential adverse cumulative effects on vulnerable groups. The Applicant's consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in item 3.5.6b above. Updated position following email received on 22nd June 2026: SCC considers that NGET has not addressed the concerns raised the first paragraph of SCC's comments in regard to cumulative workforce/labour market pressures. These are **very significant** matters that require addressing. These are proposed to be dealt with in an S106 Schedule (as presented by the Host LAs). Further, no effort has made been to address the Public Health comments	

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		and will be installed in good time prior to any closures or diversions being implemented.		
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.4 and 17.5 of **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision B]** and in **6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [Revision D]**. The assessment of effects during operation (and maintenance) presented is considered appropriate. As noted, the inter-project cumulative assessment set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision D]** highlights potential adverse effects in relation to mental health and wellbeing for the reasons described. The Applicant will continue to engage with stakeholders potentially affected by the Project during the construction phase, using a variety of communication means. The approach to engaging with local communities is set out in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [Revision D]**. The assessment presented in **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision C]**, together with supplementary information provided in **8.16 Health and**	SCC considers that the assessment does not fully capture the ongoing cumulative Health and Wellbeing effects on local residents. There are numerous NSIPs in the locality which are increasing causing multiple disruptions to everyday activities and where communities are already experiencing mental health inequalities. SCC provided the following comments in their relevant representations dated 27 November 2025: • The cumulative effects of multiple infrastructure projects in the same locality can result in significant adverse impacts on community wellbeing, including increased anxiety, loss of control, and emotional distress, as identified in the Suffolk County Council's Community Engagement and Wellbeing SGD. The chapter goes some way to recognise this in Paragraph 17.5.47: "In a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction	Not agreed

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		Wellbeing and Socio economics, Recreation and Tourism Technical Note [Revision C], are considered proportionate and appropriate to identify impacts and appropriate mitigation as it relates to socio-economic effects. The Applicant maintains that there would be no significant cumulative workforce/labour market pressures as a result of the Project. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	phases." These impacts may not be fully captured by the EIA process and require mitigation through early, continuous, and collaborative engagement, as well as support for community leaders and volunteers. Updated position following email received on 22nd June 2026: SCC considers that NGET has not addressed the concerns raised the first paragraph of SCC's comments in regard to cumulative workforce/labour market pressures. These are **very significant** matters that require addressing. These are proposed to be dealt within an S106 Schedule (as presented by the Host LAs). Further, no effort has been made to address the Public Health comments	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.12.12	Outline CoCP	**7.2 Outline Code of Construction Practice [Revision G]** includes all relevant construction related mitigation measures specified in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [Revision D]** and is appropriate for managing construction impacts from the Project. The Applicant has responded to SCC's response to ExQ2 GEN 2.2 in **8.4.15 Applicant's Comments on Responses to**	SCC considers that additional mitigation may be required during construction. SCC notes that oCoCP states in para 17.5.20 "*Where the significance of a cumulative effect would be moderate or above (adverse or beneficial), it is considered to be*	Not Agreed

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		ExQ2 [REP6-115]. The Applicant's position in relation to the location-specific compensatory measures was set out in **8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]** in addition to Appendix A of **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]** and **8.5.12 Applicant's Written Summary of Oral Submissions and Responses to Action Points for Issue Specific Hearing 4 [REP6-118]**. The Applicants approach to Landscape compensation is summarised in row 3.2.13 above. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	*'significant'. The need for additional mitigation measures has been considered, where necessary*." SCC notes that the following items in Table 17.7 of the ES Chapter 17 **[APP-281]** are noted as "effects would be **moderate adverse** and **significant**" but with no proposed mitigation. Effects on Rolling Valley Farmlands and Furze LCT (Project Section B) and Ancient Plateau Claylands LCT (Waveney Valley area) (Project Sections B and C) Effects on Ancient Plateau Claylands LCT (Project Section B and C) and Rolling Valley Farmland LCT (Bramford Substation area) (Project Section B) SCC is firmly of the view that mitigation at these locations will be necessary to make the Proposed Development acceptable in planning terms (as outlined SCC's response to ExQ2 GEN2.2 **[REP5-271]**.	

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3.13 Development Consent Order

Table 3.13 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the **3.1 Draft Development Consent Order**.

This table contains the views of the Applicant and SCC up to and including the draft DCO submitted at deadline 5 **[REP5-060]**. Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[PD-011]**, it has not been possible to include updates to the draft DCO after this iteration.

The Applicant and SCC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
3.13.1	DCO Requirements - Interpretation	The Applicant has updated **3.1 Draft DCO [REP5-060]** to remove the definition of "discharging authority" and has provided a new two-limb definition of 'relevant planning authority' which removes any ambiguity by making clear that in a two-tier area, the district planning authority is the primary discharging body; and includes a separate definition of "relevant county planning authority" who is named as a consultee where county-level expertise is relevant. The Applicant has also removed the reference to "other discharging authority" in Requirement 4 (Construction management plans) to **3.1 Draft DCO [REP5-060]** following deletion of the definition of discharging authority and has replaced the wording "in consultation with" by "following consultation with" to clarify that it is the relevant planning authority who is responsible for making and communicating its	**Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(1) defines "discharging authority" as "the body responsible for giving any consent, agreement or approval required by a requirement included in this Order …". Requirement 4 (construction management plans) provides for the involvement of the "other discharging authority" in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions (Section 120(2)(a) Planning Act 2008) and one of the six tests for conditions is precision (Circular 11/95: Use of conditions in planning permission (paragraph 14). SCC consider the inclusion of "discharging authority" in requirement 4 creates imprecision and requests that the applicant recasts	Agreed

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		decision following consultation and that the decision does not rest with the consultee. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	requirement 4 so that the body they want to be involved in requirement 4 is named.	
3.13.2	DCO Requirements - Interpretation	The Applicant has updated **3.1 Draft DCO [REP5-060]** to reflect the authorities' requested amendment. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	**Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(4) needs to be amended as follows – "Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement". . 226. This amendment is consistent with the drafting of the equivalent paragraph of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958).	Agreed
3.13.3	DCO Requirements – Stages	The Applicant considers that the proposed notice period for the anticipated	**Schedule 3 (requirements) (requirement 3(1) (stages of authorised development))** – requires that a written notice setting out	Not Agreed

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	of authorised development	programme for the carrying out of pre-commencement operations is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) within that period. However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout **3.1 Draft DCO [REP5-060]**. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than five business days prior to the date on which those pre-commencement operations are first carried out. A period of 7 days is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC's experience of discharging requirements under that Order has shown the 7-day time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days Or 25 business days.	
3.13.4	DCO Requirements – Stages of authorised development	The Applicant has updated **3.1 Draft DCO [REP5-060]** to a 'business day' equivalent of 25 business days' for consistency of terminology. The Applicant has also updated **3.1 Draft DCO [REP5-060]** to allow 5 business days for submission of the notice of commencement and completion of construction of each stage of the authorised development. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	**Schedule 3 (requirements) (requirement 3(2) and (3) (stages of authorised development))** – provides for notice of the commencement and completion of each stage to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for this information to be provided and considers it should be provided in 5 working days.	Agreed
3.13.5	DCO Requirements – Archaeology requirement wording	The Applicant has removed the reference to "discharging authority" in Requirement 5 (Archaeology) to **3.1 Draft DCO [REP5-060]** following deletion of the definition of discharging authority in Requirement 1	**Schedule 3 (requirements) (requirement 5(2) (archaeology))** – While SCC maintains concerns regarding the drafting of requirement 5 (see the *Post-Hearing Submission for ISH3*, submitted at	Under discussion

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		and has made amendments as to the need for the county planning authority to be a named a consultee in historic environment matters and to refer to Historic England as a consultee rather than a discharging authority. The Applicant is committed to continue discussions with SCC in relation to the proposed requirement wording, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Deadline 6) this amendment is satisfactory. However, SCC considers that all parts of Requirement 5 must work together and therefore this remains under discussion until such time as ID 3.13.6 – 3.13.9 are agreed.	
3.13.6	DCO Requirements – Archaeology requirement wording	The Applicant has updated **3.1 Draft DCO [REP5-060]** to refer to "written schemes of investigation" accordingly. The Applicant is committed to continue discussions with SCC in relation to the proposed requirement wording, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	**Schedule 3 (requirements) (requirement 5(2) (archaeology) –** the development is expected to be delivered in stages, and each stage may involve multiple phases of archaeological work including evaluation and mitigation. Accordingly, Requirement 5(2) should be amended to refer to **"detailed written schemes** of **investigation" (DWSI)** (plural, rather than singular) to reflect that more than one DWSI will be produced for this scheme. Using the plural recognises that each stage may require multiple DWSIs and ensures clarity for the applicant and discharging authority, and secures the appropriate level of archaeological investigation, recording, and mitigation for all parts of the authorized development. SCC maintains concerns regarding the drafting of requirement 5(2). These are set	Under discussion

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			out in the *Post-Hearing Submission for ISH3*, submitted at Deadline 6.	
3.13.7	DCO Requirements – Archaeology requirement wording	The Applicant has updated **3.1 Draft DCO [REP5-060]** to replace the word "The" accordingly. The Applicant is committed to continue discussions with SCC in relation to the proposed requirement wording, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	**Schedule 3 (requirements) (requirement 5(3) (archaeology) –** paragraph (3) provides for a single DWSI, however, as discussed above, each stage is likely to have multiple DWSIs produced to deliver the appropriate level of archaeological investigation. SCCAS would therefore recommend this is reflected in paragraph 3 as follows – "(3) **Each** The detailed written scheme of investigation…"	Under discussion
3.13.8	DCO Requirements – Archaeology requirement wording	The Applicant has updated **3.1 Draft DCO [REP5-060]** to remove the introductory words "For the avoidance of doubt" accordingly. The Applicant is committed to continue discussions with SCC in relation to the proposed requirement wording, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	**Schedule 3 (requirements) (requirement 5(4) (archaeology) –** the introductory words "For the avoidance of doubt" are unnecessary and should be omitted. In the light of SCC's proposed amendments to requirement 5(1) and (2), as set out in the *Post-Hearing Submission for ISH3*, submitted at Deadline 6, SCC considers paragraph (3) of requirement 5 can be removed.	Under discussion
3.13.9	DCO Requirements – Archaeology requirement provisions	The Applicant has submitted **8.9.1 Applicant's Response to First Written Questions – Corrected Response to Question DCO 1.S8 [AS-090]**, comprising a discussion draft of Requirement 5 showing how it would appear should all amendments proposed by the host authorities and Historic England be accepted. The Applicant has updated **3.1 Draft DCO [REP5-060]** to:	**Schedule 3 (requirements) (requirement 5(3) (archaeology) – recommended further provisions –** there must also be provision to secure full post-excavation analysis, timely publication, and deposit of complete physical and digital archives, with funding in place to deliver these stages. In the light of this, SCCAS recommend the inclusion of the following provisions in requirement 5 –	Under Discussion

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		• Provide for the approval of written scheme of investigation (WSI) for evaluation works • Clarify for consistency with the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [Revision C]** (OAMS-OWSI) that a preservation in situ management plan would, if relevant, form part of a detailed written scheme of investigation as opposed to being separate • Provide that evaluation works must be carried out in accordance with the WSI referred to above • Set out the process for post-excavation assessment, approval of an archaeological updated project design, post-excavation analysis, publication and archiving. The Applicant has incorporated the wording suggested by SCC for the post-excavation analysis, publication, and deposit of archives and acknowledge thatalternative very similar wording was proposed by other Local Authorities. The Applicant is committed to continue discussions with SCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	"5(5) No later than two years after the completion of the construction phase of work, an Updated Project Design must be submitted to and approved by the Local Planning Authority. The Updated Project Design must be in general accordance with the approved Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation, and relevant Detailed Written Schemes of Investigation, and set out scope for full post-excavation analysis, publication, and address the site-specific research agendas. Post-excavation analysis and publication must be carried out in accordance with the approved Updated Project Design. 5(6) The full archaeological archive, both physical and digital, must be deposited to the relevant archaeological archive repository, for that County, in accordance with the approved archaeological Updated Project Design. This drafting is based on requirement 3(6) (archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) and so is a regime which the Secretary of State has already considered appropriate for Suffolk. SCCAS consider the regime should apply to the instant project also. June 2026 – SCC Archaeological Service The applicant has provided amended requirement wording at Deadline 5 in **3.1**	

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			Draft DCO [REP5-060]. However, there are serious concerns regarding the proposed archaeological requirement wording and SCCAS will provide comments at Deadline 6. This matter is therefore still under discussion with the applicant.	
3.13.10	DCO Requirements – Construction hours	The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]** and further explained why reduced working hours would not be sufficient to deliver this Project by the end of 2030 to DCO 2.S9 in **8.9.2 Applicant's Responses to Second Written Questions [REP5-211]**. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft DCO [REP5-060]**. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week	**Schedule 3 (requirements) (requirement 7 (construction hours))** – this provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S. I. 2022/432). Requirement 24 of that Order states the core hours are "between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays", subject to certain exceptions listed in sub-paragraph (2). SCC's proposed amendments to requirement 7 include the following. Requirement 7(1) should be amended as follows – "Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07. 00 and 19. 00 Monday to Friday and 08. 00 and 13. 00 on Saturdays, unless otherwise approved by the relevant planning authority".	Not Agreed

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		to week, and working will not take place every weekend. The construction working hours set out in **3.1 Draft DCO [REP5-060]** define the maximum permissible envelope within which works may take place and do not indicate that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours provides flexibility to manage construction sequencing and programme resilience, including accommodating weather related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. All construction activity remains subject to the controls set out in **7.2 Outline Code of Construction Practice [Revision G]**. The inclusion of Sundays and bank holidays within the defined core working hours provides flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. A blanket prohibition on Sundays / bank holidays would	Requirement 7(2) should be amended as follows – "No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 08. 00 to 13. 00 on Saturdays, unless otherwise approved by the relevant planning authority". Requirement 7(3) should be amended as follows –. "Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 08. 00 to 13. 00 on Saturdays, unless otherwise approved by the relevant highway authority". Requirement 7(4)(a) should be omitted. Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4. 3. 5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(3)(g) of the Bramford Order states –. "(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1) — (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain	

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		materially harm the deliverability of this critical national priority project. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO controls to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [Revision G]**, including controls on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). Requirement 7(4) of Schedule 3 of **3.1 Draft DCO [REP5-060]** permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts. Trenchless crossings may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Works affecting highways, railways	why that work could not be completed within the core working hours referred to in sub-paragraph (1)"; [Words not included in the dDCO shown underlined]. SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO. Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4. 3. 5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(4) of the Bramford Order states – "The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours". SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.	

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		and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at night or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. HGV deliveries are not allowed to arrive before 07:00 or depart after 19:00 on weekdays, or before 07:00 or after 17:00 at weekends and on Bank Holidays with the exception for specific activities outlined in Requirement 7 sub paragraphs (4) and (5), or if approved by the relevant highway authority. A request was made in an LIR for the wording be altered to HGV movements to clearly include trips that are not deliveries such as removal of spoil from site. This comment is addressed in the Traffic and Transport section in Chapter 4 of this document. HGV movements associated with the Project will be constrained to the working hours unless otherwise agreed		

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		with the Local Highway Authority. There are a number of operations which may take place outside of core working hours (paragraph 2.3.3 of **7.3 Outline Construction Traffic Management Plan [Revision F])** which are not expected to have a large number of HGV trips associated. Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision G].** These controls include provisions relating to noise management, lighting, environmental protection and monitoring, ensuring that any out-of-hours activity is appropriately managed and minimised. The measures set out within **7.2 Outline Code of Construction Practice [Revision G]** will be secured via Requirement 4(1)(a) (Construction Management Plans) of **3.1 Draft DCO [REP5-060]** within the final CoCP. There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in Section 4 of **6.14 Environmental**		

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		Statement Chapter 14 - Noise and Vibration [Revision B]. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
3.13.11	DCO Requirements – Reinstatement planting scheme	The Applicant has proposed a 5 year replacement period, the duration of which is consistent with recent National Grid DCOs including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Five years is considered appropriate for the types of reinstatement and mitigation planting proposed for the Project. Planting sizes and species have been selected based on those that would naturalise more easily than larger tree stock. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	**Schedule 3 (requirements) (requirement 9(3) (reinstatement planting scheme)) –** this provision states – "Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority". The reference to "5 years" should be changed to "10 years", which would provide greater ecological improvements.	Not Agreed

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3.13.12	DCO Requirements – Additional requirements (Surface water management plan)	Commitment GG22 in **7.2 Outline Code of Construction Practice [Revision G]** secures that the Main Works Contractor(s) will prepare a Surface Water Management Plan. This plan will be substantially in accordance with **8.2 Drainage Strategy DCO [REP1-072]**, submitted at Deadline 1 and updated at Deadline 4 **[REP4-186]**, and would demonstrate how runoff across construction work sites would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes. The drainage mitigation measures described in this strategy are secured by commitments in the **7.2 Outline Code of Construction Practice [Revision G]** via Requirement 4 (Construction Management Plans) of **3.1 Draft DCO [REP5-060]**. The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	The LLFA considers that temporary drainage for construction shall be provided for approval in the form of a construction surface water management plan ("CSWMP").	Agreed
3.13.13	DCO Requirements – Additional requirements (Employment and skills plan)	As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in **8.9.1 Applicant's Responses to First Written Questions [REP3-074]**, the Applicant has engaged with the LPAs and submitted **8.13 Outline Employment and Skills Plan [REP5-215]** into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that	SCC supports the standard mitigation measures proposed but requires a stronger commitment to maximising local employment opportunities, with clear targets and monitoring mechanisms, to be clearly set out via a Skills Plan, incorporating, supply chain skills plans, a strategic approach to developing and supporting the project's workforce requirements.	Under Discussion

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		the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The commitment to implementing the project in accordance with an Employment and Skills Plan has been secured by way of a DCO Requirement (Requirement 15) in **3.1 Draft DCO [REP5-060].** The Applicant is committed to continue discussions with SCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.		
3.13.14	DCO Requirements – Additional requirements (Ecology working group)	The Applicant has updated **7.4 Outline Landscape and Ecological Management Plan [Revision G]** to align the remit of the Ecology Working Group to the suggested text within paragraph 2.3.1 of **Suffolk Wildlife Trust's Written Representations [REP1-278]**. The Applicant therefore considers that the purpose, scope and operation of the Ecology Working Group are secured through Requirement 4 of **3.1 Draft DCO [REP5-060]** and a separate requirement is not necessary. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	SCC has recommended that the formation and remit of an Ecology Working Group is secured in a separate requirement and has provided draft requirement wording / Terms of Reference in Appendix 1 to Comments on any further information or submissions received by deadline 4 **[REP5-270]**.	Not Agreed

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3.13.15	DCO Requirements – Applications made under requirements	The Applicant has had regard to feedback received from host authorities both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. The Applicant's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers	**Schedule 4 (discharge of requirements) (paragraph 1, timescales)** – the timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in Advice Note Fifteen: drafting Development Consent Orders. The **EM [APP-057]** justifies the shorter timescales as follows –. "Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from those recommended in Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. There is precedent for these time frames in the recently made National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024". (Paragraph 4.4.2). This argument is unconvincing. The 28-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect "the immediate and pressing national need which the project is intended to address". While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will	Not Agreed

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		the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. Nevertheless, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft [REP5-060] to** extend the 25 business day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. In any case, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure SCC, and other relevant host authorities, are able to respond on programme. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, the Councils consider a 56-day decision-making period would be reasonable. Paragraph 4.4.3 of the **EM [APP-057]** says this schedule is "identical to the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024". It is not. The equivalent period in the Bramford Order is 35 days. SCC's experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. More time, not less, is required here.	
3.13.16	DCO Requirements – Further information	Given the Project's status as a project of critical national importance, the Applicant considers five business days for the relevant discharging authority to request additional	**Schedule 4 (discharge of requirements) (paragraph 2, further information) –** SCC considers the provisions for requesting	Not Agreed

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		information to be proportionate and appropriate. The Applicant has updated **3.1 Draft DCO [REP5-060] to** replace the five-day period for the request of further information to five 'business days' for consistency of terminology. This amendment to five business days has also been applied to the time periods for issuing consultation to a requirement consultee and for notifying the Applicant of any request for further information. In addition, the Applicant has replaced the original 21 day period for notification of further information requested by a requirement consultee with an equivalent period of 15 business days. Paragraph 2(4) of Schedule 4 to **3.1 Draft DCO [REP5-060]** allows the relevant authority to seek the Applicant's consent to request further information after the 5 business day period if necessary. The Applicant notes SCC's comment about time limits but does not agree that the same time limit should apply irrespective of whether consultation with a requirement consultee is required. The current drafting is consistent with recent National Grid DCOs including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant recognises that a mutually agreed position has not been reached, and	further information to be insufficient. As drafted, the discharging authority is permitted only 7 days to request further information otherwise it is considered to have sufficient information. This is an unreasonable burden to place on the discharging authority. Deciding whether further information is needed requires an extensive review of the documents submitted by officers of various technical disciplines which is unfeasible to complete in 7 days. The Order makes provision of 35 days to decide applications, the bulk of which time is spent reviewing the submitted documents to reach a conclusion on whether they fulfil the obligations set out in the requirement. It is only once the documents have been thoroughly reviewed that it can be decided whether an application includes sufficient information for the requirement to be discharged. There is no limit to how many applications can be submitted to a discharging authority at once meaning it is possible for the discharging authority to be expected to review multiple applications amounting to many hundreds of pages of technical detail in just 7 days. Therefore, SCC considers a more reasonable time limit of 21 days would give the discharging authority adequate time to decide whether an application contains sufficient information. If the Applicant maintains that 7 days is reasonable, then this	

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		therefore the matter is recorded as Not Agreed.	position should be justified in the **EM [APP-057]** which currently lacks such a rationale.	
3.13.17	DCO Requirements - Fees	The Applicant does not consider it appropriate or proportionate to require payment of the application fee for any consent sought under the **3.1 Draft DCO [REP5-060]**, some of which will be very minor in nature. The Applicant has prepared a draft post-consent Planning Performance Agreement (PPA) which has been shared with SCC to deal with matters relating to post-consent working, including cost recovery. The Applicant would reimburse the host authorities for reasonably and properly incurred costs in progressing the agreed workstreams, as it has done for the Application Stage planning performance agreements. However, the Applicant considers that making entry into a PPA a pre-condition to making any application to discharge requirements under the Order is disproportionate and inappropriate. The discharge of requirements process must, in the manner of other made DCOs, be capable of operating from the moment the DCO is granted. In relation to paragraph 3(1), the Applicant has amended **3.1 Draft DCO [REP5-060]**, to refer to the current national fee schedule applicable to the discharge of planning conditions. The drafting proposed by the Applicant in this paragraph has precedent in a number of recent development consent orders,	**Schedule 4 (discharge of requirements) (paragraph 3, fees) – the** first point to make is that while SCC will be required to deal with applications for consent under articles and under requirements, however, by paragraph 3(1) of Schedule 4, a fee is only payable in respect of requirements. SCC considers that fees should also be paid for dealing with applications under articles and requirements. SCC's approach here is consistent with the standard drafting for a provision dealing with procedure for the discharge of approvals, as set out in Appendix 1 to PINS Advice Note 15, which concerns drafting DCOs. There is no justification in the **EM [APP-057**] for departing from this advice. The second point to make is that the proposed fee is unreasonably low. Paragraph 3(1) says a fee must be paid as follows – "(a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £145 per request unless a bespoke arrangement has been agreed between the applicant and discharging authority and legally secured".	Under Discussion

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		including the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement) Order 2024. In relation to paragraph 3(2) the Applicant will consider a revised alternative drafting to **3.1. Draft DCO [REP5-060]**, which would provide that where an application is rejected as invalid, the relevant authority may retain the fee and credit it against a future application to discharge a requirement. This approach is akin to the arrangements under the Town and Country Planning Act 1990 regime, whereby an applicant is not required to pay a second fee when resubmitting a valid application for the same matter following the rejection of an earlier application as invalid. The Applicant is committed to continue discussions with SCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.	Regarding (a), this is an application for a nationally significant infrastructure project under the Planning Act 2008, not for (say) a garage extension under the TCPA 1990. The fee should reflect the work involved. Turning to (b), £145 per application is lamentably and unreasonably low. If we assume an hourly rate of £100 for an officer to deal with this work, the fee under (b) would mean the officer would have to deal with any discharge application within around 90 minutes before dealing with the application started to cost the local authority money. It is unlikely that any application will be capable of determination within that period. While the Councils cannot make a profit for this work, it is reasonable for it to seek the full recovery of the actual costs incurred. The applicant's approach here is wholly unfair. This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 1 of Schedule 4, the Councils will have 28 days to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. The same applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for SCC, diverting officer resource from other matters.	

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			The inclusion of the deeming provision and its effects on SCC resourcing is another reason why SCC considers its full costs for this work should be covered by the applicant. Rather that the regime currently proposed in the Order, SCC considers it would be preferable if the applicant and SCC entered into a planning performance agreement ("PPA") for the full recovery of SCC's costs in discharging any application under the Order. Paragraph 3(1) should be recast to provide that no application can be made until an appropriate PPA is in place. Moreover, paragraph 3(2) – which provides for the refund of fees in certain circumstances – is unreasonable and should be deleted. For example, paragraph 3(2)(a) provides for repayment in the event of "the application being rejected as invalidly made". To reject an application, the discharging authority will have had to consider it and the time taken to do so should be paid by the applicant and not the authority. The text above was set out in SCC's LIR **[REP1-178]** in paragraphs 14.74 to 14.80. Since then, and in accordance with the Applicant's commitment to enter into a post-consent planning performance agreement ("PPA") with SCC, the Applicant has shared a draft PPA with SCC. A first meeting on the same is due to take place on 23 July. Notwithstanding this positive step, SCC	

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			considers drafting amendments are required to paragraph 3 of Schedule 4 and these are set out in Appendix A to SCC's Deadline 6 submission *Post-Hearing Submission for Issue Specific Hearing 3/4*.	

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4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Suffolk County Council on the date specified below.

Signed for and on behalf of National Grid:

[redacted] Simon Pepper

Date:

20/07/2026

Signed for and on behalf of Suffolk County Council:

[redacted] [redacted]

Date:

20/07/2026

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Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
MSBDC	Mid Suffolk and Babergh District Council
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PARS	Primary Access Routes
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
SCC	Suffolk County Council
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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Appendix A.
Draft DCO wording

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Appendix A
Draft DCO wording

The below table sets out the respective positions of the Applicant and Suffolk County Council in relation to the wording of the draft DCO. Babergh and Mid Suffolk District Councils have deferred matters relating to the dDCO to SCC.

This table contains the views of the Applicant and SCC up to and including the draft DCO submitted at deadline 5 **[REP5-060]**. Due to the lead in time for finalisation and signatures of the final SOCG at deadline 7 in accordance with the Rule 8 Letter **[PD-011]**, it has not been possible to include updates to the draft DCO after this iteration.

The Applicant and SCC are committed to continuing discussions regarding these matters, which will likely conclude after finalisation of this SoCG. On this basis some matters where active negotiation is taking place are retained as Under Discussion.

Table A.1 Comments on dDCO - Suffolk County Council

ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
1	DCO Wording - maintain	The definition of "maintain" included within Article 2(1) of the **3.1 Draft DCO [REP5-060]** reads as follows (emphasis added): *"maintain" includes inspect, repair, adjust, alter, dismantle, remove, clear, refurbish, paint, surface treat, decommission, improve, reconstruct or replace any part* ***but not remove, reconstruct or replace the whole****, of the authorised development including through the use of robots, helicopters, drones, gadgets or similar devices either remotely controlled or autonomous, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement, and any derivative of "maintain" must be construed accordingly;"*	Article 2(1) (interpretation) – the definition of "maintain" includes the replacement of any part of the authorised development and the replacement of the whole of it. The Council would like to know to what extent "replacement" has been assessed and where this is considered in the Environmental Statement. The Council would like to know to what extent the definition of "maintain" duplicates the applicant's PD rights. The definition of "maintain" remains unchanged and does not seem to address the point made by Braintree DC in its LIR regarding who decides whether the maintenance would give rise to any	Under Discussion

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ID	Matter	National Grid's Position	Suffolk County Council's Position	Status
		The current drafting, which is consistent with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, reflects the Applicant's view that there would be no scenario where the whole of the authorised development would or could be reconstructed or replaced using powers of maintenance under Article 4 of the **3.1 DCO [REP5-060].** In respect of the second part of its representation on this point, SCC is directed to Section 4.10 (Operation (and Maintenance)) of **6.4 Environmental Statement Chapter 4 - Project Description [Revision B]**. The ES does not consider any scenarios where large sections of the Project would need to be replaced because such scenarios are considered to be very unlikely, whereas the purpose of EIA is to identify likely significant effects. The environmental effects of maintenance work would be no greater, and likely much lower, than the effects resulting during construction of the Project and so are not reported separately. Noting the well-established precedent which underpins the current definition of "maintain", the Applicant would welcome clarification from SCC as to the relevance of the third and final part of its representation on this point (concerning the Applicant's permitted development rights as a statutory undertaker). The Applicant notes the concern raised by Braintree DC and flagged by SCC, however, it would reiterate that as a transmission licence holder, the Applicant has statutory duties to	materially new or materially different environmental effects.	

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		maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. As transmission licence holder, the Applicant is the appropriate body with the expertise to discharge its statutory duties in respect of electricity equipment. It is essential that the Applicant is not delayed or prevented from carrying out essential maintenance that enables it to comply with this duty. In response to Braintree DC's comments, the Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, *"provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement"*, is included in the definition of "maintain". The Applicant maintains its position that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant as is common on electricity projects such as this. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. A failure to comply with a term of the DCO would be an offence that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008. The Applicant notes the Council's proposed deemed consent mechanism but disagrees that it		

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		should be included. In addition, some maintenance works will be so minor in their nature that the inclusion of such a provision would be wholly disproportionate to the nature of the proposed maintenance works. Furthermore, it would not be appropriate to require the Applicant to seek consent from the relevant planning authority to carry out emergency repair works which also fall within the definition of 'maintain'. As noted above, the Applicant's current approach to maintenance has precedent in a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and the Applicant does not consider it necessary to depart from such precedent in this case.		
2	DCO wording – permit scheme	The Applicant notes the point made by SCC. However, with reference to Article 2(9) of the **3.1 Draft DCO [REP5-060]** (copied below), the Applicant does not consider that an amendment to the definition of "permit scheme" is necessary. By virtue of Article 2(9), any updates to the permit schemes referenced in the draft DCO would have automatic effect in the context of the application of Article 12 (Application of the permit schemes). Article 2(9) reads as follows: *"References in this Order to any statute, order, regulation or similar instrument are to be construed as a reference to the statute, order, regulation or instrument as amended by any*	Article 2(1) (interpretation) – the definition of "permit scheme" means a permit scheme in force on the date on which the Order is made. The Council consider the definition should allow for the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.	Agreed

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		subsequent statute, order, regulation or instrument or as contained in any subsequent re-enactment" The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.		
3	DCO wording – pre-commencement operations	The Applicant has carefully considered the definition of 'pre-commencement operations' to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project and has provided justification for its inclusion as drafted in the 3.2 Explanatory Memorandum (Revision C). The operations comprised in the definition of pre-commencement operations are either de minimis or have minimal potential for adverse impacts, and by virtue of Requirement 4 of the Order, must be carried out in accordance with the outline management plans. Indeed, they may, in some cases, need to be carried out in order to comply with pre-commencement requirements (for example, to inform assessments and proposals required to be submitted for approval) or to implement environmental mitigation or other measures required pursuant to European Protected Species licences. As noted in the 3.2 Explanatory Memorandum [Revision C], the additional items contained in the definition of 'pre-commencement operations' beyond those in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are:	Article 2(1) (interpretation) – the definition of "pre-commencement operations" is wide-ranging and goes well beyond the Explanatory Memorandum's ("EM") description of these works as "de minimis or [having] minimal potential for adverse impacts" (paragraph 3.6.6) **[APP-057]**. Further details can be found in representations.	Under Discussion

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		• Listed building surveys – these have been included at the request of Essex County Council; • Protection works comprising utilities protection works or fencing and protection slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. • Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary • laydown areas in addition to construction compounds. National Grid does not consider its inclusion to be materially beyond the scope already set out. • Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put the Applicant in a favourable		

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		position to deliver the Project by the target date. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the Order which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement. The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, the Applicant considers that the exclusion of these works and operations from the definition is appropriate.		
4	DCO Wording – Development consent etc. granted by the Order	The Applicant has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances. The Applicant provided further justification in **3.2 Explanatory Memorandum [REP3-006]** at Deadline 3.	**Article 3(6) (development consent etc. granted** by the **Order) –** this provision states that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent they "relate to, are required by or are incidental to the carrying out of the authorised development". This is a broad power which does not appear to have been included in the precedents	Under discussion

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			cited by the applicant in paragraph 1.2.5 of the EM **[APP- 057].** It will be remembered that paragraph 1.2 of *Advice Note Fifteen: drafting Development Consent Orders* states: "A **thorough justification** should be provided in the Explanatory Memorandum for **every Article** and **Requirement**, explaining why the inclusion of the power is appropriate in the specific case. The **extent** of **justification should be proportionate** to the **degree** of **novelty and/ or controversy** in **relation** to the **inclusion** of **that particular power".** [Emphasis added]. Contrary to the advice, here, no justification for this provision is included in the EM (see paragraph 1.2.5 of the EM **[APP-057]).** To allow SCC to understand the need for this provision, **SCC requests that** the **next draft** of the **EM is updated** to **include justification** for **this provision. It would also be helpful** to **know which buildings within SCC's administrative are proposed** to **be demolished.**	
5	DCO wording – Consent to transfer benefit	The Applicant considers that Article 7(5) of the **3.1 Draft DCO [REP5-060]** already addresses the point raised by SCC. However, to the extent that SCC has any further concerns, the Applicant would be pleased to consider those.	**Article 7 (consent to transfer benefit of Order) –** this article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents	Agreed

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		For the avoidance of doubt, Article 7(5) states: "*Where a transfer or grant has been made in accordance with paragraph (1), the undertaker must notify the relevant planning authority of the same.*" *"Relevant planning authority"* has the meaning given to it in Article 2(1). The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.	under the dDCO, SCC requests that it is notified as soon as reasonably practicable.	
6	DCO wording – planning permission	The Applicant does not have currently have a specific planning permission or DCO in mind. However, and with reference to Paragraph 3.14.2 of the **3.2 Explanatory Memorandum [Revision G]**, the Applicant is cognisant of the fact that a number of other nationally significant infrastructure projects are situated, or proposed to be situated, in proximity to the Project. This Article has therefore been included on a precautionary basis and seeks to address any risks, both in relation to the Project and also in relation to third party developments, which could arise from the decision in *Hillside Parks Ltd v Snowdonia National Park Authority* 2022 UKSC [30].	**Article 10(2) (planning permission)** – this provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the applicant would confirm whether it has any specific planning permission or DCO in mind.	Under Discussion
7	DCO wording – street works	As a fundamental point of principle, the Applicant does not agree that a secondary tier of consents is appropriate or necessary in relation to the exercise of street works powers under	**Article 11(1) (street works)** – absent a suitable highways side agreement or protective provisions to protect SCC's highways interests, SCC considers art.	Under Discussion

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		Articles 11(1), 14(1), 15(1) and 16(1)(a) of the **3.1 Draft DCO [REP5-060]**. The nature and extent of those powers is already suitably constrained and will, in any event, be subject to detailed scrutiny as part of the Examination process. It would be wholly inappropriate, taking account of Parliamentary intentions underpinning the Planning Act 2008 regime, for SCC (or indeed any other highways authority) to be afforded a further opportunity to limit the practical application and exercise of any statutory powers which the Secretary of State has determined are necessary to enable the timely delivery of the Project in response to a critical national need. The Applicant is, however, content for the *conduct* of the works permitted by the above mentioned Articles to be subject to appropriate and proportionate pre-commencement controls, in accordance with the Protective Provisions included for the benefit of SCC and other local highways authorities at Part 4 of Schedule 16 to the draft DCO.	11(1) should be subject to the street authority's consent. 205. The same point applies in respect of the following articles:14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way).	
8	DCO wording – street works	The Applicant notes that the principle of including deemed discharge provisions in the **3.1 Draft DCO [REP5-060]** is not unique to this Project. The principle has very recent and relevant precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The inclusion of such provisions is considered justified on the basis that it is essential that	**Article 11(2) (street works)** – Under several of the draft DCO's articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that approval must not be "unreasonably withheld or delayed" and there is also a provision that it is deemed to be given	Under Discussion

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		the delivery of a project of this scale and critical national importance is not unnecessarily frustrated by matters outside of the Applicant's control. Further, the Applicant does not agree with SCC's position that the inclusion of deeming provisions in the draft DCO negates the need for the draft DCO to also state that approvals must not be unreasonably withheld or delayed. The underlying purpose of both mechanisms is to ensure the timely delivery of this critical national infrastructure (CNI) project. The deemed consent element provides a clear timeframe for the decision to be made, with scope to extend subject to agreement e.g. for more complex applications. The '*not to be unreasonably withheld or delayed*' wording is to ensure that where matters are quick and easy to resolve then the decision makers should not use the full time for a time period for a determination or wait for the expiry of the deemed consent period. Taking account of the critical national need for the Project, the Applicant envisages that there may well be situations where a more straightforward or routine approval is sought from the relevant authority and where it would therefore be reasonable to expect a decision to be proactively taken without delay by the authority at the earliest opportunity – notwithstanding the ultimate fall-back position of a deemed consent mechanism. The Applicant would, in practical terms, anticipate working closely with SCC and other relevant	after 28 days. In several cases this appears to be unprecedented in DCOs or not well precedented. 207. SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be "unreasonably withheld or delayed". 208. SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2)(a) and (b) (permanent stopping up of streets and public rights of way), 16(2), 16(5)(b) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 49(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).	

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		authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO. The Applicant remains in ongoing dialogue with SCC to ensure that the impacts of the Project are appropriately managed and mitigated.		
9	DCO wording – Street works	Whilst SCC's commitment to determine all applications for consent or approval as expeditiously as possible is welcomed, the Applicant does not consider that a decision period of 56 days would be conducive to the timely delivery of the Project. The Applicant has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance	**Article 11(3) (street works)** – provides that if a street authority fails to respond to an application for consent within 28 days of the application being made, that street authority is deemed to have given its consent. 210. While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented (For example: East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity	Under Discussion

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		to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. In each instance, the **3.1 Draft DCO [REP5-060]** allows for the relevant decision-making authority and the undertaker to agree "such other period" as may be appropriate in the circumstances.	Transmission's Sea Link application and National Grid Interconnector Holdings Limited's LionLink Interconnector application). A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications. . 211. Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision. 212. SCC requests that 28 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping). . 213. A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.	
10	DCO Wording – Application	National Grid notes SCC's comments and has amended Article 12(2)(d) of **3.1 Draft DCO**	**Article 12(2)(d) (application of the permit schemes)** – this provision prohibits "the relevant street authority"	Agreed

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	of the Permit Schemes	**[REP5-060]** (draft DCO) to refer in both instances to 'the relevant highway authority'. The Applicant has updated the draft DCO accordingly.	from permitting certain works at a certain time but then says "local highway authority" may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term "local highway authority" is not used elsewhere in the dDCO (save in a single definition) and is not a defined term itself. In articles 12(3), (4) and (5) "the relevant highway authority" referred to and SCC wonders whether that term should also be used (whether once or twice) in article 12(2)(d). SCC would welcome the applicant's explanation on this drafting point.	
11	DCO wording – Application of the 1991 Act	The Applicant would welcome further engagement with SCC Highways in order to better understand their concerns on this point. Notwithstanding those future discussions, the Applicant considers that the provisions are appropriate in the context of this Project. The disapplication in Articles 13(3) and (4) of the **3.1 Draft DCO [REP5-060]** has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.	**Article 13(3) and (4) (application of the 1991 Act)** – SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).	Under Discussion
12	DCO wording – Temporary closure	The Applicant notes that Article 16(1) is well-precedented, with the overall power constrained to such temporary diversions or prevention	**Article 16 (temporary closure of streets and public rights of way)** – by article 16(1), the undertaker may, "for any	Not agreed

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	of streets and PROW	of access as are required for the purposes of carrying out the authorised development. More specifically, reference is made to the **7.6 Outline Public Rights of Way Management Plan [REP5-163]** which explains, in detail, the management regimes to be adopted in the context of the Project, as well as stating the Applicant's clear ambition to minimise disruption to PRoW users wherever reasonably practicable. In that context, and with reference to the detailed information included in Table 8.3 of the **7.6 Outline Public Rights of Way Management Plan [Revision D]**, it is noted that the duration of each temporary closure will vary, but the key principle of only restricting access for as long as necessary to complete the required construction works would be applied at all times. Turning to the second of SCC's comments on this point, the Applicant notes that Article 16(4) already states that if a street or public right of way specified in Parts 1 and 3 of Schedule 8 is to be temporarily closed, altered or diverted, the undertaker must provide the temporary diversion as specified in column (4) of that Part. If a street or public right of way is 'provided', the implication is that it must therefore be open for use. The Applicant does not consider that any amendment to the drafting is necessary. Article 16(5) states that the street authority must be consulted before the undertaker temporarily closes, alters or diverts any street or public right	reasonable time" divert traffic from the street or public right of way; and prevent all persons from passing along the street or PROW. SCC would welcome more information as to what "a reasonable time" might be. 217. In addition, SCC considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.	

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		of way specified as mentioned in paragraph (4). Given the temporary nature of the diversions, the Applicant does not consider that it is feasible for a temporary diversion to be completed to the reasonable satisfaction of the street authority, taking into account its duties to act economically and efficiently. Therefore, and noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008, the Applicant cannot agree to include the additional wording in Article 16. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.		
13	DCO wording – Temporary closure of streets and PROW	The Applicant does not consider that it is necessary to add any additional wording to clarify that a discharging authority has the discretion for reasonable conditions to be attached to an approval or consent. Article 55(3) (Procedure regarding certain approvals etc) of the **3.1 Draft DCO [REP5-060]** is clear that where such consent, agreement or approval is granted under the DCO, it will be subject to the same appeal procedure as the requirements including where a condition to which the undertaker objects is included. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	**Article 16(5)(b) (temporary closure of streets and public rights of way)** – this provision refers to the street authority's ability to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 42(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for consistency and the avoidance of doubt, SCC considers each provision	Not agreed

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			which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e. g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 16(2) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 49(2) (traffic regulation), and 50(4) (felling or lopping).	
14	DCO Wording – Removal of Human Remains	The Applicant's position is that the proposed amendment introduces uncertainty due to imprecise drafting (for example, it is unclear what is meant by "best practice documents"). Furthermore, the Applicant would question why a burial licence would be necessary given the procedure set out in Article 23 of **3.1 Draft DCO [REP5-060]** provides that the Applicant must apply to the Secretary of State for direction as to the subsequent treatment of the remains and must comply with the terms of the DCO and the Secretary of State's direction. Failure to comply would be a breach of a term of the DCO and would be an offence. However, the Applicant's appreciates Suffolk County Council's concern about compliance with the relevant written scheme of investigation and the treatment of remains (including before, during and after removal) and, should the Examining Authority consider it necessary and appropriate, the Applicant would be willing to include the following wording in paragraph (13):	**Article 23 (removal of human remains)** – as drafted, this article raises significant concern for SCC's Archaeological Service ("SCCAS"), particularly in respect of the way in which archaeological human remains will be treated. As drafted, the article poses a risk to archaeological heritage assets and threatens to delay the project. SCCAS understands there are no records of any historic human remains or burial sites within the Order Limits in Suffolk. However, it is not uncommon for human remains to be encountered during archaeological fieldwork, and a project of this scale should anticipate the potential discovery of such remains during ongoing evaluation and mitigation. SCCAS considers article 23 conflicts with archaeological best practice for dealing with human remains in archaeological contexts as it would lead to burial features	Under discussion

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		"(13) In the case of remains in relation to which paragraph (12) applies, the undertaker— (a) may remove the remains; (b) must apply for direction from the Secretary of State under paragraph (15) as to the treatment of the remains (including their treatment prior to, during and after removal) ~~as to their subsequent treatment~~; and (c) must deal with the remains in such manner, and subject to such conditions, as the Secretary of State directs, in each case in accordance with any applicable terms of a relevant written scheme of investigation approved under paragraph 5 (archaeology) of Schedule 3 (requirements), unless the Secretary of State directs otherwise."	being exposed for an extended period, constituting a risk of damage or harm. For remains over 100 years old, it is usually standard archaeological practice that the terms of the Burial Act 1857 are followed; however, by article 23(17), section 25 of the Burial Act 1857 is disapplied in respect of a removal carried out in accordance with article 23. SCCAS considers article 23 should be amended so that the removal of remains considered to be over 100 years old should be carried out in line with the Burial Act 1857, any issued burial license, the relevant detailed written scheme of investigation, and best practice documents. SCCAS therefore recommends that article 23 is amended as follows – "(17) Subject to subject to paragraph (17)A, section 25 of the Burial Act 1857 (offence of removal of body from burial grounds) does not apply to a removal carried out in accordance with this article. (17A) Subject to paragraph (17B), the disapplication mentioned in paragraph (17) does not apply to the removal of human remains where the undertaker is satisfied that the remains were interred more than 100 years ago. (17B) A removal to which paragraph (17A) applies must also be carried out	

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			in accordance with any issued burial license, any relevant detailed written scheme of investigation approved in accordance with requirement 5 (archaeology), and best practice documents". SCCAS requests that the Applicant engages with SCCAS in respect of the drafting of this article.	
15	DCO Wording – Time limit for CA powers	The Applicant refers to the justification already provided in Paragraph 3.38.1 of **3.2 Explanatory Memorandum [Revision G]**: 'When paired with the programme and nature and scale of the Project, National Grid is of the view that seven years is justified. A period of seven years is precedented in other Orders, including the East Anglia ONE North Offshore Windfarm Order 2022 and the East Anglia TWO Offshore Windfarm Order 2022. The Statement of Reasons (document reference 4.1) provides further details on compulsory acquisition and time limits.'The Applicant notes the authorities' comments on the "usual position", but reiterates that for a project of this nature and scale, its position remains that seven years is proportionate and justified. The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	**Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily)** – SCC considers allowing the applicant seven years to issue 'notices to treat' or a 'general vesting declaration' to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position and SCC considers the usual position should be adopted here, especially since (per article 34(4)) that period will not be affected by any legal challenge to the decision to grant development consent for the project. Moreover, per requirement 2(1) (time limits) the undertaker has five years to commence the authorised development and SCC would usually expect the period in article 34(1) to be same as the period included in the requirement. For example, in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958), the time limit in the relevant provisions is the same i.e.	Not agreed

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			5 years (see article 32(1) (time limit for exercise of authority to acquire land and rights compulsorily)) and requirement 2(1) (time limits). The same applies to the recently made Sunnica Energy Farm Order 2024 (SI 2024/802) (see article 18(1) and requirement 2(1)) and the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) (see article 31 and requirement 1), both of which are located in Suffolk.	
16	DCO Wording – Traffic Regulation	It is not appropriate for a copy of the instrument to be held at the Applicant's registered office, however, the Applicant has proposed alternative drafting requiring (a) a copy of the instrument to be made available on request and (b) a copy of the instrument to be served on the relevant traffic authority.	**Article 49(5) (traffic regulation)** – this provision refers to the "instrument" made under paragraph (1), (2) or (3) of article 49. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest a new article 49(13) is included as follows – "(13) A copy of the instrument referred to in paragraph (5) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority".	Under discussion
17	DCO wording – Felling or Lopping	a. The Applicant refers to **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**, the conclusions of which directly informed the baseline for the assessment of effects on hedgerows,	**Article 50 (felling or lopping)** – SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this Article without any provision for special consideration	Under Discussion

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		including important hedgerows, as reported in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]**. Table 8.23 in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [Revision B]** records the conclusions of the assessment undertaken as follows: *"Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significant residual effect on 'Important' hedgerows."* The **7.2 Outline Code of Construction Practice [Revision G]** includes a commitment that following detailed design and prior to construction (of relevant parts of the Project), relevant surveys would be undertaken of arboricultural features that may be impacted or need to be removed to ensure any hedgerow removal is reduced as far as practicable b. The **2.16 Trees and Hedgerows to be Removed and or Managed Plans [Revisions C/D as relevant]** identify the potential effect of the Project on all relevant trees and hedgerows, including important hedgerows, situated in proximity to the Order limits. It is noted that the impact upon individual hedgerows (i.e. those shown on the Plans as 'potentially affected', 'affected managed' or 'removed') could change depending on the final location of the Project within the LoD which the Applicant is seeking consent for.	to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: "…the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority" (paragraph 22. 1). 222. Regarding "a plan to specifically identify the hedgerows to be removed", while the applicant has prepared "trees and hedgerows to be removed and/or managed plans" it is not clear those plans apply to all hedgerows or important hedgerows to be removed and SCC would welcome clarification on this point. 223. Regarding consent, only trees "within or overhanging the extent of the public highway" (and not included in the "trees and hedgerows to be removed and/or managed plans") are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might	

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		c. The Applicant notes that SCC intends to give further consideration to the drafting in Article 50(4) .	seek the amendment of this article to include a more general consent provision.	
18	DCO Wording – Protective provisions (Highways)	The Applicant shared the draft protective provisions in favour of the local highway authorities on 22 July 2025 with Suffolk County Council (as well as the other Highways Authorities) requesting any comments. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the Highways Authorities. Whilst National Grid has not yet received any response to this from Suffolk County Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or an joint highways framework Agreement). It is the Applicants understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments) to all the Highways Authorities and we await comments from Suffolk County Council.	**Schedule 16 (protective provisions) –** Part 4 of Schedule 16 includes provisions for the protection of highway authorities. These have not been agreed by SCC and there have been no discussions with SCC about them. SCC would welcome discussions as a matter of urgency, noting the contents of the MHCLG and DLUHC guidance Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects (30 April 2024) which states: "Applicants should expect to agree the form of protective provisions with the relevant parties for inclusion in the draft DCO prior to submitting the application for development consent…" [Emphases added].	Under discussion

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