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Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.1 Signed Statement of Common Ground - Norfolk
County Council (NCC) (incl LLFA and Highways) - Tracked
Changes Version

Final Issue E

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nationalgrid

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B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
D	10 June 2026	Deadline 5
<u>E</u>	<u>21 July 2026</u>	<u>Deadline 7</u>

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1 Introduction

1.1 Overview

- 1.1.1
- This ~~draft~~final Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as the Applicant within this document) and Norfolk County Council (NCC). 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 NCC. The applicable matters considered within this SoCG apply to NCC’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

~~Note: This draft SoCG has been prepared for Deadline 5. It is intended to be a live and working document which will be updated as the Project progresses and shared with NCC at key points for discussion. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.~~

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		

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.2.11 – Consideration of power delivery	NCC seek further assurances from the Applicant on opportunities to improve power delivery to Norfolk, including to support housing and employment growth. The Applicant is considering NCC's request to financially contribute towards an Energy Plan.	The Applicant seeks to respond to NCCs request by Deadline 7.
Ecology and Biodiversity		
3.3.3 – Data sources 3.3.7 – Baseline conditions and receptors 3.3.9 – Standard mitigation 3.3.13 Outline CoGP 3.3.14 – Outline LEMP 3.3.16 – Arboriculture Impact Assessment	NCC is reviewing these sections relating to ecology and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.	Resolution likely to be by Deadline 7 following meeting with the technical specialists.
Historic Environment		
3.6.9 – Additional mitigation <u>3.2.13 - Legal Agreements</u>	NCC is reviewing the additional mitigation measures proposed for Historic Environment effects (in relation to archaeological surveys). The Applicant will discuss and respond to any comments raised following the NCC review <u>secure any offsite BNG required and identified by the Biodiversity Offsetting Scheme, and delivery of any offsite tree planting by requirement.</u>	Resolution likely to be by Deadline 7 following engagement with Stakeholders regarding the next draft of the Outline AMS-OWSI <u>Discussions will conclude after finalisation of this SoCG through wording of the requirements.</u>
3.6.15 – Outline Archaeological Mitigation Strategy and Outline WSI <u>3.2.14 - Compensation/offsetting</u>	NCC is to review the updated Outline Archaeological Mitigation Strategy and Outline WSI distributed to stakeholders in May 2026. The Applicant will liaise with NCC regarding the document ahead of submission. <u>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</u>	Resolution likely to be by Deadline 7 following engagement with Stakeholders regarding the next draft of the Outline AMS-OWSI <u>Discussions will conclude after finalisation of this SoCG through the draft DCO wording.</u>
Hydrology, Land Drainage and Flood Risk		

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.7.1—Policy and legislation 3.7.3—Data sources 3.7.5—Key parameters and assumptions 3.7.6—Baseline conditions and receptors 3.7.7—Embedded mitigation 3.7.8—Standard mitigation 3.7.9—Additional mitigation 3.7.10—Construction effects 3.7.11—Operational (and maintenance) effects	NCC is reviewing these sections relating to Hydrology, Land Drainage and Flood Risk and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.	Resolution likely to be by Deadline 7 following meeting with the technical specialists.
3.7.12—Outline CoCP (including Flood Warning and Evacuation Plan)	NCC considers the Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity and expects the plan to be aligned with EA and ADEPT guidance, with robust justification for departures. The Applicant considers the oCoCP includes all relevant construction mitigation measures specified in the ES and is appropriate for managing construction impacts from the Project. Any additional information will be included in the updates to the FWEP at Deadline 6.	Resolution likely to be by Deadline 7 following further discussion with the technical specialists.
3.7.13—Flood Risk Assessment	NCC consider that the 7.9 Flood Risk Assessment [APP-331] lacks the site specific modelling, detailed drainage design annexes and consistent application of stated methodologies. Engagement between the Applicant and NCC is ongoing and will inform future drafts of the Applicant's Drainage Strategy 8.2 Drainage Strategy DCO [REP4-186] which will be submitted later in the examination.	Resolution likely to be by Deadline 7 following further discussion with the technical specialists.
Landscape and Visual		
3.8.9—Additional mitigation <u>3.8.9b – Compensation</u>	NCC considers that the applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. The Applicant has	Resolution likely by Deadline 7 <u>Discussions will conclude after finalisation of this</u>

SoCG ID	Summary of matter under discussion	Deadline for resolution
	requested NCC review Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] which sets out the Applicant's position on landscape mitigation and compensation. <u>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.</u>	<u>SoCG through the draft DCO wording.</u>
Socio-economics, Recreation and Tourism		
3.9.7—Embedded mitigation 3.9.11—Operational (and maintenance)	NCC is reviewing these sections relating to Socio-economics, Recreation and Tourism and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.	Resolution likely by Deadline 7.
Traffic and Transport		
3.10.3—Data sources	NCC has queried the datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 6
3.10.6—Baseline conditions and receptors	NCC has queried the datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 6
3.10.10—Construction effects	NCC's concerns relating to construction effects on PAR 8. The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 7
3.10.22—Baseline conditions	NCC has queried datasets used to establish transport baseline. The Applicant has undertaken a further review and will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 7
3.10.42—Primary access route selection	NCC seeks a commitment that all HGV traffic accessing the A1066 crossing point uses PAR 9 instead of PAR 8. The Applicant is seeking to agree a suitable distribution of traffic on the A1066 between the PAR 8 and PAR 9. The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 7
3.10.45—Traffic management—core	NCC sought clarification on the list of operations that may take place outside of the core working hours. The Applicant will continue to liaise with	Resolution likely by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
working hours	NCC in relation to this matter.	
3.10.46 – Traffic management	NCC sought clarification on HGVs travelling outside working hours to get to site. The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 6
3.10.47 – Traffic management	NCC sought clarification on LGVs and HGVs outside peak hours. The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 6
3.10.51 – Traffic Management	NCC sought clarification on how numbers of HGVs to and from the site would be controlled; <u>and on what will be put in place to account for where HGV levels are materially different from those forecast</u> The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 7 <u>Matter is unlikely to be agreed during Examination.</u>
3.10.55 – Proposed Construction Access on the A1066 via Diss and Thetford	NCC raised concerns of construction traffic using the A1066 (PAR 8) based on traffic counts and clarification on usage of congestion signs at various sites along the route. The Applicant will continue to liaise with NCC in relation to this matter.	Resolution likely by Deadline 7
Cumulative effects		
3.12.7 – Embedded mitigation	NCC is reviewing these sections relating to Cumulative effect and will provide the Applicant with an update once complete. The Applicant will liaise with NCC once feedback is received.	Resolution likely by Deadline 7
3.12.8 – Standard mitigation		
3.12.9 – Additional mitigation		
3.12.12 – Outline CoCP		
Development Consent Order		
3.13.4 – Surface water drainage management plan	NCC seeks a surface water drainage or management plan to be submitted for approval. The Applicant considers this requirement is already secured through Commitment GG22 in the Outline Code of Construction Practice, which provides for a Surface Water Management Plan to be in accordance with the Drainage Strategy submitted at Deadline 1 and updated at Deadline 4.	Resolution likely by Deadline 5 <u>Discussions will conclude after finalisation of this SoCG</u>
3.13.5 – Employment and skills plan	NCC seeks an employment and skills plan to be submitted for approval. The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this	Resolution likely by Deadline 6

SoCG ID	Summary of matter under discussion	Deadline for resolution
plan will be secured by a new DCO Requirement.		
Appendix A – DCO Wording	Discussions are ongoing in relation to detailed drafting points on: • <u>Protective Provisions (Highways);</u> • Closure of public rights of way <u>Reasonable Conditions;</u> • Street works without the consent of the street authority; and • Street works subject to reasonable conditions	Resolution likely by Deadline <u>Discussions will conclude after finalisation of this SoCG</u>

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
 - 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 would 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 NCC
 - **Section 3** summarises the key matters and captures the status of each issue / matter
 - **Section 4** includes the sign off sheet

2. Record of Key Engagement

- 2.1.1

National Grid has engaged with NCC 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 NCC.

Table 2.1 Summary of engagement between National Grid and NCC

Date	Format	Topic/Description
General		
April 2022 – Ongoing	Meeting	Monthly informal catch-up calls.
September 2022	Meeting	All host authority workshop.
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.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.

Date	Format	Topic/Description
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.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	National Grid issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	National Grid issued the draft Outline Code of Construction Practice (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 Landscape and Ecological Management Plan (LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to discuss National Grid's approach to targeted consultations
January 2025	Meeting	All host authority workshop
January 2025	Email Correspondence	National Grid issued the second iteration of the draft Outline Code of Construction Practice (CoCP)
January 2025	Meeting	National Grid held a meeting to discuss comments from the second iteration of the oCoCP and oLEMP
January 2025	Email Correspondence	National Grid issued the draft Statement of Common Ground (SoCG)
April 2025	Meeting	Meeting to go through host authority workshop updates (NCC unable to attend original workshop)
May 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Code of Construction Practice oCoCP
May 2025	Email Correspondence	National Grid issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy

Date	Format	Topic/Description
May 2025	Email Correspondence	National Grid issued 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	Meeting to progress Statement of Common Ground
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	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
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 NCC and other authorities.
August 2023	Meeting	National Grid discussed the potential off-site scheme/initiatives for BNG.
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

Date	Format	Topic/Description
		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 Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	National Grid hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	National Grid held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	National Grid held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	National Grid shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)
January 2025	Email Correspondence	National Grid issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	National Grid issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	National Grid issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	National Grid issued an updated iteration of the draft Outline Landscape and Ecological Management Plan (oLEMP)
May 2025	Email Correspondence	National Grid shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals
September 2025	Meeting	Optional thematic group meeting to discuss feedback on the ecology section of the Environmental Statement
February 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground.
May 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground.
June 2026	Email	NCC shared the final updates to Statement of Common

Date	Format	Topic/Description
Ground for this topic.via email.		
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 Noise and Vibration assessment for review and comment.
September 2022	Email Correspondence	National Grid issued the proposed methodology and scope of the Air Quality 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	NCC requested consideration of mental health during operation. NCC also requested that baseline data should be provided to aid further levels of detail where possible.
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 Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
October 2025	Meeting	Optional thematic group meeting to discuss feedback on the health and wellbeing section of the Environmental Statement.
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

Date	Format	Topic/Description
		defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
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 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 Zone of Theoretical Visibility (ZTV)) for feedback from all host authorities, Natural England and Historic England.
March 2024	Meeting	Archaeology Working Group Meeting with archaeological advisor from NCC in attendance.
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.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
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

Date	Format	Topic/Description
		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 for information.
June 2024	Meeting	Archaeology Working Group Meeting.
July 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 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.
November 2024	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
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	Email Correspondence	National Grid issued Historic Environment (HE) Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	National Grid issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	National Grid issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site

Date	Format	Topic/Description
June	Technical Note	National Grid shared the Archaeological Fieldwork Summary.
June 2025	Meeting	Archaeology Working Group Meeting
July 2025	Meeting	Archaeology Working Group Meeting
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
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	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.
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
March 2026	Meeting	Meeting to discuss the approach to the phase 2 trial trenching
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	Archaeology Working Group Meeting.

Date	Format	Topic/Description
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).
July 2023	Email Correspondence	Response to comments received on the technical note setting out the approach to preparing the FRA.
March 2024	Technical Note	National Grid issued the Flood Risk Assessment Screening Report for comment.
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 held a meeting to discuss comments raised from the draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	National Grid issued 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
March 2026	Email correspondence	National Grid shared a copy of the Drainage Strategy to assist with reviewing project responses to stakeholder feedback.
April 2026	Meeting	Meeting with LLFA to discuss Drainage Strategy and other outstanding comments
June 2026	Meeting	Meeting with LLFA to discuss Drainage Strategy and

Date	Format	Topic/Description
other outstanding comments		
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 Norfolk. National Grid sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
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 NCC) 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 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.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
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 NCC and other stakeholders following the Landscape Thematic Group Meeting.

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.
October 2024	Meeting	National Grid held a 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
December 2024	Meeting	Meeting to agree photography locations and photomontages 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 to discuss any questions relating to the Environmental Statement.
January 2026	Meeting	Meeting to discuss the LVIA aspects of the Statement of Common Ground.
March 2026	E-mail 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 NCC's Local Impact Report
May 2026	Meeting	Meeting including Suffolk County Council to discuss and understand additional measures requested at Waveney Valley and justification
June 2026	Meeting	Meeting to Discuss the remaining matters Under Discussion relating to Landscape within the Statement of Common Ground.
June 2026	Meeting	Meeting with NCC including SCC to discuss location specific landscape compensation measures at Waveney Valley
July 2026	Meeting	Meeting with NCC including SCC to discuss location specific landscape compensation measures at Waveney Valley

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,

Date	Format	Topic/Description
		Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate.
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 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.
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	Email Correspondence	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 Environmental Statement.
May 2026	Meeting	Meeting to discuss the Statement of Common Ground with Essex Place Services.
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

Date	Format	Topic/Description
		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 Transport Working Group Regional Meeting.
November 2023	Meeting	National Grid held a Transport Working Group meeting with the Local Highways Authorities.
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) (document reference 7.3) at the Transport Working Group Meeting.
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 NCC).
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	Email Correspondence	Proposed AIL Routes issued for comment.
July 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. Discussed planning applications and impact of access to Norwich Substation and need to understand duration of works/mitigation
August 2024	Meeting	National Grid held a Transport Working Group Meeting. Discussion over DCO projects that may overlap the Project. Discussion held on staff worker movements and sensitivity of junctions in Norfolk.
August 2024	Meeting	Meeting to discuss the PRoW survey locations.
August 2024	Email Correspondence	NCC feedback on proposed AIL routes/structures received.
September 2024	Meeting	National Grid held a Transport Working Group Regional Meeting. General structure and content of Transport Assessment (TA) was presented. National Grid provided an overview of the initial capacity assessment

Date	Format	Topic/Description
		methodology using.
October 2024	Meeting	National Grid held a Transport Working Group Meeting.
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.
December 2024	Email Correspondence	Email received from NCC outlining process for obtaining Approvals in Principle (AIPs) for assessment of structures along proposed AIL routes and how this would be managed alongside the DCO application.
January 2025	Meeting	National Grid held a Transport Working Group Regional Meeting. Presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where walker, cyclist and horse rider (WCH) Amenity.
February 2025	Email Correspondence	National Grid issued the Mitigation and Junction RAG Strategy.
February 2025	Email Correspondence	National Grid issued the Draft Transport Assessment and Figures.
February 2025	Email Correspondence	NCC feedback on proposed AIL routes received.
February 2025	Email Correspondence	National Grid issued AIL Structures Register for NCC review and feedback.
February 2025	Email Correspondence	NCC structural feedback for proposed AIL routes received (AIL structures register issued to NCC in Feb 2025 returned with comments).
March 2025	Meeting	Additional Institute of Environmental Management and Assessment (IEMA) Mitigation Meeting. Presented examples of the likely environmental mitigation measures following draft ES assessment of effects on Primary Access Routes predominately for WCH Amenity.
March 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. National Grid's position on various elements of the traffic and transport and highways design clarified.
April 2025	Meeting	National Grid held a NCC Highway Mitigation Workshop. Highway mitigation proposals on Wymondham Road were discussed.
April 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. AIL process, routes and agreement on approach sought ahead of DCO.
April 2025	Meeting	National Grid held a NCC workshop to discuss the Work in Progress Transport Assessment. NCC comments on

Date	Format	Topic/Description
		the draft document were discussed.
May 2025	Meeting	National Grid held a Regional Stakeholder Meeting with NCC. 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 NCC. 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 Norfolk County Council.
August 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
September 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.
October 2025	Meeting	National Grid held a Regional Stakeholder Meeting with Norfolk County Council present. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
November 2025	Meeting	National Grid held a Local Highway Authority Thematic Group Meeting with Norfolk County Council.
January 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Construction Traffic Flows and Statements of Common Ground matters and updated positions from NCC.
February 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.
February 2026	Email Correspondence	National Grid issued a register detailing updates that were made to the draft CTMP between Norfolk County Council providing comments and the formal DCO submission of the CTMP.
February 2026	Email Correspondence	Norfolk County Council confirmed via email the acceptance of updates to the SoCG and CTMP, and provided some additional comments.
May 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.
May 2026	Meeting	National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.

Date	Format	Topic/Description
<u>June 2026</u>	<u>Meeting</u>	<u>National Grid held a meeting with Norfolk County Council to discuss further discuss Statements of Common Ground matters and updated positions from NCC and National Grid.</u>
<u>July 2026</u>	<u>Email Correspondence</u>	<u>Norfolk County Council confirmed via email their acknowledgement of the Addendum to the Transport Assessment and noted that they did not have any additional comments or concerns to raise on the document's contents.</u>

3. Matters Agreed, Not Agreed or Under Discussion

3.1 Overview

- 3.1.1
- This chapter details the matters relevant to NCC 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 NCC. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in ~~Table 3.2~~[Table 3.2](#)

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.
Not Applicable	Indicates where an issue is not relevant to the stakeholder and therefore does not require further discussion or agreement

- 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 3.13~~[Table 3.12](#) provides the matters agreed, not agreed-~~or,~~ under discussion [or not applicable](#) in relation to the various topics.

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	Norfolk 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].	NCC Response to Statutory Consultation (June 2024): The need for upgrading the electricity transmission network at both the national and local level is recognised and this proposal would assist in meeting the Government's objectives on net zero and delivering offshore wind power.	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 in contracts with energy generators (or customers) by NESO. Appendix 2 of the NESO Clean Power 2030	NCC Response to Statutory Consultation (June 2024): The Hiorns' Report commissioned by Norfolk, Suffolk and Essex County Councils concluded that while there is a demonstrable need for additional capacity to the existing network arising from new offshore wind generation and low carbon energy generation in the region (Sizewell C), it does	Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		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]. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	not support the current delivery timetable of 2030 outlined by National Grid; and instead suggests additional capacity would not be needed until 2035+ Furthermore, the Report suggests that the cost of the offshore alternatives have been over-estimated by National Grid.	
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 Comments on Local Impact Reports [REP2-030]. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	The County Council's position (2024) remains as set out to previous consultation rounds and supports in principle an offshore option; or where this proves undeliverable then support should be given towards an onshore underground option <u>. As</u> as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury.	Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.2.4	Predominantly overhead line route	Norwich to Tilbury has been designed in line with policy statement EN-5 (2024) (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 High Voltage Direct Cables (HVDC), 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' in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	NCC Response to Targeted Consultations (Feb 2025):- Previous comments relating to alternative transmission alternatives have not been addressed in the current consultation and as such the County Council continues its objection to the current proposal for an overhead power line (400 kV) between Norwich and Tilbury. The County Council continues to support in principle <u>maintains its preference for</u> either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded.	Not agreed

Project development process - Design

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
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 project. 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]. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	NCC is deeply disappointed that the use of underground cables through the Waveney Valley cannot be achieved without environmentally disruptive, technically uncertain or disproportionately costly techniques. It is NCC's strong view that the absence of an undergrounded alternative for the Waveney Valley leaves a hole in the project's mitigation for landscape and visual effects which urgently needs to be filled. The failure of a feasible undergrounding option does not absolve the applicant from the need to consider ways in which impacts can be reduced, mitigated or compensated for. NCC would ask that the applicant provide more detail to justify the statement at paragraph 4.6.16 of the Design Development Report (regarding WVA) that tunnelling (as opposed to horizontal directionless drilling or driven pipe methods) 'would be possible but at a level of cost not considered to be compatible with National Grid's duties to be economical' NCC would welcome discussions with the applicant to explore these opportunities.	Not agreed
3.2.6	Brick Kiln Lane County Wildlife Site	<u>The Applicant notes NCC's concerns regarding the alignment at Meadow Wood and the potential effects on trees of high arboricultural value. The route alignment in this location forms part of the iterative design process documented in the Design Development Reports and reflects a balanced consideration of environmental,</u>	NCC has been made aware of disagreement over the alignment of the cable route at Meadow Wood near Bunwell which is detailed in section 4.4 of the Design Development Report. The alignment has been routed to avoid the Brick Kiln Lane County Wildlife Site but now is set to over	Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>technical, engineering and land use constraints.</u> The proposed route of the overhead line avoids woodland impacts within the Brick Kiln County Wildlife Site (CWS) further to the east, but as a <u>which was identified as a key environmental constraint during route development. The Applicant considered alternative alignments in this area; however, these would have resulted in greater effects on designated ecological interests and other environmental constraints. The selected alignment was therefore considered to represent the most appropriate balance of environmental effects when assessed against the Project's design objectives and constraints.</u> <u>As a result this</u> unavoidably increases the effects on the adjacent area of woodland within the Tas Valley. It will be necessary to undertake some tree removal within the woodland to provide clearance for the overhead line, but this will be limited to only the amount of tree cover necessary to meet safe electrical clearance requirements. Typically, tree removal is potentially required close to the alignment (20 m to either side of the centreline) with canopy management (rather than tree removal) for a further 8 m beyond the 20 m. <u>With several high value trees in this area the Applicant considers the proposed alignment minimises impacts to these trees and additionally retains the veteran group VG406 below the overhead lines. The area of woodland proposed to be over sailed contains an area of scrub (mainly blackthorn) and early mature ash trees showing varying levels of ash</u>	sail a woodland which contains a number of individual trees of high arboricultural value. NCC is concerned that the presence of overhead electrical cables will mean that a considerable number of valuable trees are removed or cut back for maintenance or safety reasons. It is not clear where in the ES the impacts on this location are reckoned, or, given that there appear to be feasible alternatives presented in the Design Development Report, where the relative harms of these alternative alignments are explicitly weighed against each other.	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>dieback disease. The temporary access route through the woodland aligns with a disused woodland track. It is proposed that the temporary access will be constructed using ground matting in order to minimise impacts to trees and the woodland soils.</u> In addition to the 2023, 2024 and 2025 Design Development Reports, further information can be found on Sheet 8 of 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [APP-048<u>Revision C</u>] and 5.1 Consultation Report [APP-066<u>Revision B</u>]. The assessments included within the Environmental Statement, including the<u>6.13.A6</u> <u>Environmental Statement Appendix 13.6 – Arboricultural Impact Assessment</u> <u>AIA</u> [APP-236<u>Revision B</u>] currently present a worst-case assessment of potential tree loss within the area. Commitments secured through the Outline Code of Construction Practice [REP4-164<u>Revision G</u>] require that, following completion of detailed design and prior to the commencement of construction, targeted arboricultural surveys are undertaken where trees or hedgerows may be affected. The results of these surveys will inform detailed design development and construction planning, with the objective of minimising tree and hedgerow loss as far as reasonably practicable. A suitably qualified Project Arboriculturist and/or Arboricultural Clerk of Works will be appointed to oversee tree protection measures in accordance with the Outline Landscape and Ecological		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Management Plan [REP3-030] secured under Requirement 4 of the 3.1 draftDraft DCO [REP3 004Revision G]. During operation, routine maintenance inspections will identify any vegetation growth that may compromise statutory safety clearances, the extent of which will be determined once detailed design and retention measures are confirmed. <u>The Applicant therefore considers that the comparative environmental effects of alternative alignments have been assessed through the iterative design process and that the selected alignment represents the preferred option when balancing ecological, arboricultural, technical and engineering considerations.</u> <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
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.	NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.	Agreed
3.2.8	2023 non-statutory consultation	Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation and responses to feedback received	NCC agree that consultation was undertaken in accordance with the published Consultation Strategy.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		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.		
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) and supporting evidence [APP-071]. Responses to feedback received during statutory consultation are available within 5.1 Consultation Report [APP-066Revision B]. The statutory consultation was undertaken in accordance with the published SoCC.	NCC agree that consultation was undertaken in accordance with the Statement of Community Consultation (SoCC)	Agreed
3.2.10	2025 targeted consultation	Targeted consultations for Norfolk 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	NCC agree that consultation was undertaken in accordance with the Targeted Consultation Strategy	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		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).		
Other matters as required				
3.2.11	Consideration of power delivery to Norfolk to support housing and employment growth	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the electricity that will be generated and connected to the electricity transmission network by 2030, while working to the required standards. The Project would benefit the UK as a whole, including local communities, by enabling the connection of new sources of renewable energy and in doing so provide greater energy security and resilience to the Norfolk energy network. <u>The Applicant is committed to continue discussions with NCC on this matter, both parties recognise that this matter does not need to be resolved for the purpose of the examination, and therefore have retained this matter as Under Discussion.</u>	NCC seek assurances from National Grid that in the event of an onshore option being taken forward there needed to be demonstrable benefits for Norfolk in terms of providing power to communities and business to support planned growth. As currently set out, the Project would see energy passing through the County with none of the energy being used in Norfolk (2024) National Grid should engage with both NCC and UK Power Networks as part of the above project to consider what opportunities there are to provide power to Norfolk; and what additional infrastructure may be needed to secure such benefits. It is felt that this should be undertaken in conjunction with the County Council's preparation of an Energy Plan; and National Grid should contribute towards the cost of such a Plan, particularly given that other major National Grid Projects are coming forward elsewhere in the Count.	Under discussion
3.2.12	Community	The Applicant is preparing a community funds	NCC would have preferred discussions	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	benefits	package in line with the 'Guidance: Community funds for transmission 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. Later in spring 2026, the <u>The Applicant will begin consulting in July 2026</u> on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent <u>and construction starting</u> . 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.	regarding the community benefits to have occurred alongside the DCO planning process, however it is recognised that this is not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order, as such this matter is considered to be Agreed.	
<u>3.2.13</u>	<u>Legal agreements</u>	<u>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 [Revision B]. 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</u>	<u>Norfolk County Council will continue to work with the applicant towards agreement of these measures, whether they are implemented as legal agreements, requirements or otherwise.</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>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.</u> <u>The Applicant is committed to continue discussions with NCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.</u>		
<u>3.2.14</u>	<u>Landscape and visual compensation</u>	<u>As explained by Counsel for National Grid at ISH4, 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. 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 [Revision A], should the Secretary of State consider the measures necessary there is a mechanism to secure these.</u> <u>The Applicant is committed to continue discussions with NCC, which will likely conclude after finalisation of this SoCG. On this basis this matter is retained as Under Discussion.</u>	<u>Norfolk County Council remains strongly of the view that landscape compensation is necessary in the Waveney Valley due to the policy requirement in EN-1 for applicants to "set out how residual impacts will be compensated for as far as possible". The residual impacts are major and significant and it is eminently possible to secure meaningful compensation in accordance with policy and legal tests.</u> <u>The County Council will continue discussions with the applicant.</u>	<u>Under discussion</u>

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	Norfolk 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 [APP-126 Revision B] and Section 8.2 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026 Revision C]. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	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 [AS-026 Revision C].	NCC position pending review of the ES. NCC confirmed their agreement on this matter via email on 19 June 2026.	Under-discussion Agreed
3.3.4	Assessment Methodology	The assessment methodology was agreed through 6.19 Scoping Report [APP-288 to	The assessment methodology was agreed through the EIA Scoping Report and Scoping	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	Opinion received from the Planning Inspectorate.	
3.3.5	Survey Methodology	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note Technical Note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	The methodology for assessing Ecology and Biodiversity relevant to NCC was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	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 [AS-026Revision C] . The key parameters and assumptions presented are considered appropriate.	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	Agreed
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 [AS-026Revision C]. The baseline conditions and receptors presented are considered appropriate. The recent designation of Meadow Wood Nature Reserve CWS has been noted. While not considered as a CWS in the ecological assessment, due to the designation of the site in March 2026 after submission of the development consent application, this area of woodland and grassland habitat have been included under the Habitats of	NCC position pending review of the ES. NCC confirmed their agreement on this matter via email on 19 June 2026.	Under-discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Principal Importance (Section 41 of the Natural Environment and Rural Communities Act, 2006) ecological receptor and has been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026 Revision C].		
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 [AS-026 Revision C] and set out in the 7.2 Outline Code of Construction Practice [REP4-164 Revision G] and 7.4 Outline Landscape and Ecology Management Plan [Revision EG]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	Agreed
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 [AS-026 Revision C] and set out in the 7.2 Outline Code of Construction Practice [REP4-164 Revision G] and 7.4 Outline Landscape and Ecology Management Plan [Revision EG]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC position pending review of the ES NCC confirmed their agreement on this matter via email on 19 June 2026.	Under discussion Agreed

ID	Matter	National Grid's Position	Norfolk 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 [AS-026] and set out in 7.2 Outline Code of Construction Practice [REP4-164 Revision G] and 7.4 Outline Landscape and Ecological Management Plan [Revision EG] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Where updated pre-construction surveys are required, these have been set out within Section 6 of the 7.4 Outline Landscape and Ecological Management Plan [Revision EG]	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	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 [AS-026 Revision C] . The assessment of effects during construction presented is considered appropriate.	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	Agreed
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 [AS-026 Revision C] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.3.13	Outline CoCP	7.2 Outline Code of Construction Practice	NCC is satisfied that the outline Code of	Under

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[REP4-164]Revision G includes all relevant construction related mitigation measures specified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]Revision C and is appropriate for managing construction impacts from the Project. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	Construction Practice ("OCoCP") is written in line with the requirements of the model Construction Environmental Management Plan condition at D.4.1 of BS 42020:2013 (Biodiversity — Code of practice for planning and development). NCC confirmed their agreement on this matter via email on 19 June 2026.	discussionAgreed
3.3.14	Outline LEMP	7.4 Outline Landscape and Ecological Management Plan [Revision EG] includes all relevant operational related mitigation measures specified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]Revision C and is appropriate.	NCC position pending review of the ES. NCC confirmed their agreement on this matter via email on 19 June 2026.	Under-discussionAgreed
Other matters as required				
3.3.15	Biodiversity Net Gain (BNG)	National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. 7.1 Biodiversity Net Gain Report [APP-299]Revision B sets out the approach to BNG. For any BNG deficit offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers. The reference to 12.5% of habitats being surveyed is incorrect. 97% of the Order Limits have been subject to full UKHAB and BNG condition surveys. This is considered a meaningful baseline to determine the BNG requirement of the Project. The Applicant considers that through ongoing engagement between the parties, this matter can	With regard to Biodiversity Net Gain ("BNG"), the project has stated that 12.5% of the habitats within the order limits have been assessed under the condition assessment. This should be increased to meaningfully contribute to the BNG assessment to generate a realistic BNG unit value. Updated position May 2026: As agreed in meeting 26 May 2026, this matter can be Agreed.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		be has been moved to Agreed.		
3.3.16	Arboriculture Impact Assessment (AIA)	The AIA has been prepared in accordance with Appendix J of 6.19 Scoping Report -including- appendices B to K [APP-296] and is considered appropriate for this stage of the project.	<u>NCC confirmed their agreement on this matter via email on 19 June 2026.</u>	Under-discussionAgreed

3.4 Contaminated Land, Geology and Hydrogeology

3.4.1 Norfolk County Council's positions throughout this table relate to minerals. NCC has no comments regarding Contaminated Land 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	Norfolk 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 [APP-126Revision B] and Section 9.2 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181Revision B] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC confirmed via email on 18.5.2026 that this matter can now be agreed.	Agreed
EIA – Approach and Methods				
3.4.2	Study area	The study area was agreed through 6.19	The study area was agreed through the EIA	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	Scoping Report and Scoping Opinion received from the Planning Inspectorate.	
3.4.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 9.4 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181Revision B] .	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
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. NCC noted in the Statutory Consultation Responses that: <i>having examined the information within the PEIR and Appendix 9.2; the Mineral Planning Authority agrees with the methodology used to determine mineral safeguarding issues.</i>	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [APP-181Revision B] . The key parameters and assumptions presented are considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
EIA – Baseline Conditions				
3.4.6	Baseline conditions	The baseline conditions and receptors for	NCC confirmed their agreement on this	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	and receptors	Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [APP-181] Revision B . The baseline conditions and receptors presented are considered appropriate.	matter during a call held February 2026.	
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 [APP-181] Revision B . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable
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 [APP-181] Revision B and set out in 7.2 Outline Code of Construction Practice [REP4-164] Revision G . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable
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	NCC confirmed that they do not think mitigation is necessary for this topic during a call held February 2026.	Not applicable

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[APP-181 Revision B]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
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 [APP-181 Revision B]. The assessment of effects during construction presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
3.4.11	Operational (and maintenance) effects	The An assessment of effects during operation (operational and maintenance) is presented in Section 9.7 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [APP-181]. The assessment of effects during operation (and maintenance) presented is considered appropriate effects was screened out in 6.19 Scoping Report [APP-296] and was agreed within 6.20 Scoping Opinion [APP-297] .	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.4.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164 Revision G] includes all relevant construction mitigation measures specified in 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology [APP-181 Revision B] and is appropriate for managing construction impacts from the Project.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
Other matters as required				
3.4.13	Norfolk Minerals	All policy included in the Environmental	NCC wrote to the applicant on 15 October	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	and Waste Local Plan	Statement was current as of 1 April 2025, to allow sufficient time to complete the appropriate assessments and draft the Planning Statement prior to submission of the DCO application. Noting NCC's updated Minerals Plan wasn't adopted until May 2025, we have included this plan in 8.4.2 Policy Compliance Tracker [REP1-133 REP4-294], submitted to the DCO examination at Deadline 1. National Grid can confirm that the updated Plans inclusion would not have affected the conclusions in the ES or its appendices.	2025 to seek changes to Chapter 9 and Figure 9.3 of the Environmental Statement to reflect the fact that the Norfolk Minerals and Waste Local Plan ("NM&WLP") was adopted on 20 May 2025 and supersedes the policy which is quoted in the ES as submitted. This seems to us to be a straightforward factual correction so we trust that the applicant is willing to make the necessary changes. NCC confirmed via email on 18.6.2026 that this matter can now be 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	Norfolk 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 [APP-126 Revision B], Section 10.2 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192 Revision C], Section 7.2 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and Section 14.2 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B]-of-	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
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.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	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 [APP-192Revision C] , Section 7.4 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147Revision B] and Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256Revision B] .	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
3.5.4	Assessment methodology	A meeting was held on 24 September 2024 to agree the assessment methodology of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192Revision C] .	NCC welcomes the applicant's assessment of mental health impacts and the use of the Mental Wellbeing Impact Assessment Toolkit (2011), which reflects comments made by NCC Public Health and other consultees earlier in the consultation process. The specific focus on perceptions of health risk associated with EMFs is also welcomed, again reflecting NCC Public Health's previous comments. NCC notes the assessment of impacts at ward level and the methodology used to	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
			identify ward vulnerability, which again reflects NCC Public Health's earlier comments. The explicit consideration of vulnerable groups is also supported.	
3.5.5	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 [APP-192 Revision C], Section 7.4 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B]. The key parameters and assumptions presented are considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
EIA – Baseline Conditions				
3.5.6	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 [APP-192 Revision C], Section 7.5 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and Section 14.5 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B]. The baseline conditions and receptors presented are considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	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	NCC advised during a call held in February 2026 that they do not consider this	Not Applicable

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		and Wellbeing effects, are set out in Section 10.6 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192 Revision C], Section 7.6 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and Section 14.6 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	applicable for this topic.	
3.5.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192 Revision C], Section 7.6 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B], Section 14.6 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B] and set out in 7.2 Outline Code of Construction Practice [REP4-164 Revision G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC advised during a call held in February 2026 that they do not consider this applicable for this topic.	Not applicable
3.5.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 10.6 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192 Revision C], Section 7.6 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and Section	NCC confirmed their agreement with regard to the proposed mitigation relating to EMF's during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		14.6 of 6.14 Environmental Statement Chapter 14 (- Noise and Vibration) [APP-256Revision B] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.		
EIA – Assessment Conclusions				
3.5.10	Construction effects	The assessment of effects during construction is presented in Section 10.7 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192Revision C] , Section 7.7 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147Revision B] and Section 14.7 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256Revision B] . The assessment of effects during construction presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
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 [APP-192Revision C] , Section 7.7 of 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147Revision B] and Section 14.7 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256Revision B] . The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.5.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164Revision G] includes all relevant mitigation measures specified in 6.10 Environmental Statement Chapter 10 - Health	NCC confirmed their agreement on this matter during a call held February 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		and Wellbeing [APP-192 Revision C], 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147 Revision B] and 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256 Revision B] and is appropriate for managing construction impacts from the Project.		
Other matters as required				

3.6 Historic Environment

3.6.1 Comments on Historic Environment for Norfolk County Council relate to archaeology only.

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

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
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 [APP-126Revision B] and Section 11.2 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068Revision D]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
EIA – Approach and Methods				
3.6.2	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 also agreed through subsequent thematic group meetings where further comments were addressed.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of 6.11 Environmental	NCC advised they were in agreement with this matter during a meeting held in January	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Statement Chapter 11- Historic Environment [AS-068Revision D] .	2026.	
3.6.4	Assessment methodology	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 methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.6.5	Key parameters and assumptions	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 [AS-068Revision D] . The key parameters and assumptions presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
EIA – Baseline Conditions				
3.6.6	Baseline conditions and receptors	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068Revision D] . The baseline conditions and receptors presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
EIA – Embedded, Standard and Additional Mitigation Measures				
3.6.7	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 [AS-068Revision D] . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		address potential effects.		
3.6.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] Revision D and set out in 7.2 Outline Code of Construction Practice [REP4-164] Revision G . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.6.9	Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]Revision D. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. 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]REP6-059 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. It is intended to submit theThe 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, ES Appendix 11.8. This would then represent a combined total of 92% (approximately 2050ha)	The matter will remain under discussion pending final agreement on the archaeological surveysNCC confirmed by email on 2 July 2026 that 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]is agreed.	Under discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		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-068REP6-059 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. <u>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] which was submitted at Deadline 5.</u>		
EIA – Assessment Conclusions				
3.6.10	Construction effects	The assessment of effects during construction is presented in Section 11.7 of 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068Revision D]. The assessment of effects during construction presented is considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.6.11	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 [AS-068Revision D]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC does not think this is applicable for archaeology.	Not applicable

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.6.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164] Revision G includes all relevant construction mitigation measures specified in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] Revision D and is appropriate for managing construction impacts from the Project.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
Other matters as required				
3.6.13	Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.	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 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.	Agreed
3.6.14	Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required. There are still addenda to site specific WSIs forthcoming that have yet to be issued.	The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.6.15	Outline Archaeological Mitigation Strategy and Outline WSI.	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 [APP-328] REP5-161 which was submitted at	This matter will remain under discussion pending review of the updated version of the document NCC confirmed by email on 2 July 2026 that 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] is agreed.	Under discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>Deadline 5.</u>		
3.6.16	Programme for completion of archaeological fieldwork	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'. 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 completed 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 programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	Agreed
3.6.17	Supplementary Environmental Information	The Applicant has sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme'. Given the comments provided it is understood that NCC 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.		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	Norfolk 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 [APP-126Revision B] and Section 9.2 of 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-224Revision B]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. The Applicant considers that through ongoing engagement between the parties, the further updates to 8.2 Drainage Strategy [REP6-095] fully address comments raised in Responses to ExQ2 - LLFA response [REP5-257] in relation to policy and legislation, and this matter should be moved to Agreed. The updated Drainage Strategy will be submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. The Applicant <u>considers</u> this matter can be moved to Agreed.	NCC position pending review of the ES <u>Norfolk County Council consider this item to be substantially resolved, as references to policy and guidance have been updated in Revision C of the Drainage Strategy.</u>	Under-discussion <u>Agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
EIA – Approach and Methods				
3.7.2	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
3.7.3	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 [APP-221Revision B]. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	<u>The Drainage Strategy, including the latest revision, does not contain data from ground investigations which is required to inform the strategy at this stage. Ground investigations provide crucial detail on infiltration rates and groundwater levels which are fundamental to the deliverability of a drainage strategy. It is not satisfactory to leave this to detailed design because these factors heavily influence the sizing of drainage features which has a direct relationship with land take. Without evidence that sufficient drainage is possible within the footprint of the scheme, it is not possible to conclude that there will be no increase in flood risk elsewhere, as required by EN-1.</u> NCC position pending review of the ES. Full details of NCC's position are given in our post-hearing summary for ISH4 at item 9 [REP6-158].	Under discussion Not Agreed
3.7.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		from the Planning Inspectorate.	Inspectorate.	
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 [APP-221Revision B]. The key parameters and assumptions presented are considered appropriate. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. <u>The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	NCC position pending review of the ES <u>The Drainage Strategy, including the latest revision, contains assumptions which should have been bottomed out with evidence, including on infiltration rates, groundwater levels, and impermeability of temporary surfaces. This is a reflection of the lack of evidence addressed at 3.7.3.</u>	Under discussion Not Agreed
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 [APP-221Revision B]. The baseline conditions and receptors presented are considered appropriate.	NCC position pending review of the ES <u>Norfolk County Council is concerned that the baseline conditions are not properly represented due to a lack of evidence (as addressed at 3.7.3) and also by the variability in level of detail provided in different topics.</u>	Under discussion Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, 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				
3.7.7	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 [APP-224 Revision B]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. Meeting took place in April 2026 to further discuss mitigation for surface water flood risk (linked to comments received on 8.2 Drainage Strategy DCO [REP4-186]). The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. The Applicant has engaged	NCC position pending review of the ES <u>has no ability to judge the sufficiency of mitigation measures because basic information has not been included with the application. NCC cannot be confident that the proposal does not increase flood risk elsewhere, or that mitigation which complies with EN-1 can be delivered within the footprint of the development.</u>	Under discussion <u>Not agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
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 - Hydrology Land Drainage and Flood Risk [APP-224Revision B] and set out in 7.2 Outline Code of Construction Practice [REP4-164-Revision G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.<u>The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk</u>	NCC position pending review of the ES<u>has no ability to judge the sufficiency of mitigation measures because basic information has not been included with the application. NCC cannot be confident that the proposal does not increase flood risk elsewhere, or that mitigation which complies with EN-1 can be delivered within the footprint of the development.</u>	<u>Under discussion</u> <u>Not agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
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 [APP-221Revision B]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. <u>The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	NCC position pending review of the ES <u>has no ability to judge the sufficiency of mitigation measures because basic information has not been included with the application. NCC cannot be confident that the proposal does not increase flood risk elsewhere, or that mitigation which complies with EN-1 can be delivered within the footprint of the development.</u>	Under-discussion <u>Not agreed</u>

EIA – Assessment Conclusions

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
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 [APP-221Revision B]. The assessment of effects during construction presented is considered appropriate. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. <u>The Applicant has engaged with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	<u>NCC has no ability to judge the construction effects because basic information has not been included with the application. NCC cannot be confident that the proposal does not increase flood risk elsewhere.</u> <u>NCC is particularly concerned that construction effects have not been considered properly due to the large area of impermeable material proposed for use in haul roads and the fact that no investigations have been done to demonstrate the viability of drainage solutions.</u> NCC position pending review of the ES <u>NCC consider this a serious disagreement and full details are provided in our post-hearing summary for ISH4 at item 9 [REP6-158].</u>	Under discussion Not Agreed
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 [APP-221Revision B]. The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. <u>The Applicant has engaged</u>	NCC position pending review of the ES <u>NCC has no ability to judge the operational and maintenance effects because basic information has not been included with the application. NCC cannot be confident that the proposal does not increase flood risk elsewhere.</u>	Under discussion Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>with the LLFA on this matter and updated 8.2 Drainage Strategy [REP6-095] to address comments raised in Responses to ExQ2 - LLFA response [REP5-257]. The updated Drainage Strategy was submitted at Deadline 6. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in 8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.7.12	Outline CoCP (including Flood Warning and Evacuation Plan)	<u>The Applicant updated 7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [REP5-147] where additional information has become available, which was submitted at Deadline 5.</u> 7.2 Outline Code of Construction Practice [REP4-164Revision G] includes all relevant construction mitigation measures specified in 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221Revision B] and is appropriate for managing construction impacts from the Project. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>The Applicant has updated the FWEP where additional information has become available. This has been	The Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity on: • Roles and responsibilities for signing up to warning services. • Use of third-party properties as evacuation points without confirmed agreements. • Availability and accessibility of emergency plans on site. • Monitoring triggers and decision-making processes during flood events. NCC expects the plan to be aligned with Environment Agency and ADEPT guidance, with robust justification for any departures.	<u>Under discussion Not agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		submitted at Deadline 5.		
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 is engaging<u>has engaged</u> with the LLFA to discuss and resolve the comments provided on the Applicant's Drainage Strategy on this matter and updated 8.2 Drainage Strategy DCO [REP4-186]<u>[REP6-095]</u> to address comments raised in <u>Responses to ExQ2 - LLFA response [REP5-257]</u>. The updated Drainage Strategy was submitted at Deadline 1, with an update submitted at Deadline 4<u>6</u>. The Applicant has also provided responses to Norfolk County Council Lead Local Flood Authority (LLFA) in <u>8.4.15 Applicant's Comments on Responses to ExQ2 [REP6-115]</u>. However, due to the current design maturity of the Project, the Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.	Surface water flooding is inadequately considered (in contrast to fluvial and coastal risk) in the sequential test and the Flood Risk Assessment. The Environmental Statement and Flood Risk Assessment lack site-specific modelling, detailed drainage design annexes, and consistent application of stated methodologies. <u>The FRA does not reflect developments in the Drainage Strategy throughout the examination and therefore the Environmental Statement does not accurately reflect the FRA results.</u>	<u>Under discussion</u> <u>Not Agreed</u>

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	Norfolk 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 [APP-126Revision B] and Section 13.2 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226Revision B]. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
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 [APP-226Revision B].	The study area for the Landscape and Viewpoint Impact Assessment was agreed in the meeting held on 27 November 2024.	Agreed
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 [APP-226Revision B]. The Applicant awaits further correspondence and will continue to engage with NCC on this matter.	NCC consider this matter to be agreed.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.8.4	Assessment methodology (including LVIA methodology and viewpoints)	The assessment methodology is set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227Revision B]. 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 [APP-229 to APP-232Revision B]. Visualisations are provided in 7.12 Visualisations [APP-343 to APP-351, REP4-180, REP4-181 and REP4-182].	Assessment methodology for the LVIA was agreed in the meeting held on 27 November 2024.	Agreed
3.8.5	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 [APP-226Revision B]. The key parameters and assumptions presented are considered appropriate.	NCC consider this matter to be agreed.	Agreed
EIA – Baseline Conditions				
3.8.6	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 [APP-226Revision B]. The baseline conditions and receptors presented are considered appropriate. The Applicant has provided a response on the tranquillity of the Waveney Valley in Table 4.20,	NCC concludes that the LVIA baseline descriptions provided in the ES are broadly accurate, however some of the tranquillity of the Waveney Valley is understated in the ES narrative. During construction the effects are likely to be major adverse, and this cannot be overlooked in a landscape such as this.	Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		ID 11.15 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. <u>Descriptions relating to tranquillity within the landscape baseline of the Waveney Valley are set out below, with paragraph numbers cross referenced back to 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [Revision B].</u> <u>LCA A5: Waveney Rural River Valley</u> <u>Paragraph 13.3.155, page 49 [APP-228] recognises one of the key characteristics of Waveney Rural River Valley LCA as 'A peaceful and tranquil character is retained away from the main roads'. Paragraph 13.3.156, page 49 [APP-228] refers to the 'tranquil character of the landscape' in relation to coming to an overall judgement of high landscape sensitivity.</u> <u>Wooded Valley Meadowlands and Fens LCT</u> <u>Paragraph 13.3.198, page 57 [APP-228] recognises one of the key characteristics of Wooded Valley Meadowlands and Fens LCT as a 'Sense of quiet and rural isolation in many places'. Paragraph 13.3.199, page 57 [APP-228] refers to the 'tranquil character away from settlement' and 'a sense of quiet rural isolation, which contrasts with nearby settlement' in relation to coming to an overall judgement of high landscape sensitivity.</u> <u>Rolling Valley Farmlands and Furze LCT</u> <u>Paragraph 13.3.199, page 57 [APP-228] refers to the 'areas of tranquillity particularly</u>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>concentrated away from settlement' in relation to coming to an overall judgement of medium landscape sensitivity.</u> The assessment has been reviewed in light of the comments made, and it is considered that the judgements made remain fair and reasonable and are not considered to understate the tranquillity of the Waveney Valley. <u>In relation to the text within Norfolk County Council's Position, the Applicant notes that construction effects are considered in row 3.8.10.</u> The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to 'Not Agreed'. <u>Matters related to the assessment of construction effects are dealt with under ID 3.8.10.</u>		
EIA – Embedded, Standard and Additional Mitigation Measures				
3.8.7	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 [APP-130<u>Revision B</u>] and also Paragraphs 13.6.2 to 13.6.4 in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226<u>Revision B</u>]. Embedded mitigation is considered appropriate in terms of its nature and scale, to address potential effects.	It is noted that the applicant has sought to embed mitigation into the design process where possible, this is key in avoiding environmentally sensitive landscape and visual features and avoiding or reducing significant effects that may be experienced during construction and operation of the proposals. NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.8.8	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 [APP-226Revision B] and 7.2 Outline Code of Construction Practice [REP4-164Revision G]. The standard mitigation is considered appropriate, in terms of its nature and scale, to address potential effects.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.8.93. 8.9a	Additional mitigation	Additional mitigation comprises measures over and above any embedded and standard mitigation measures. The consideration of additional mitigation measures areis presented in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226Revision B]. The Applicant's approach to the mitigation hierarchy is set out in Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] and the Applicant's position on landscape mitigation and compensation is set out in Section 3.10. [REP2-030]. The Applicant notes that NCC are requesting	The applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. Whilst we understand how this position has been reached, and the embedded and standard mitigation already proposed, there is potential for improvement which will result in minimising some of the impacts and effects. The mitigation strategy is generic in approach and does not account for the varied landscape of Norfolk. Our strong view is that the mitigation package should be more ambitious so that it can better address the significant adverse residual effects and	Under discussion Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>that the Project should aim for measures beyond standard and embedded mitigation.</u> <u>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).’</u> <u>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 contains plans which set out the constraints and 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 set out in Section 2.5 of 8.4.12.2 Response to ISH2 Action Point 27 – Masterplans [REP5-199]. Without prejudice to the Applicant's position, the Applicant has been engaging with NCC in relation to these compensatory measures and refining the mechanism to secure them.</u>	aim for enhancement.	
3.8.9b	<u>Compensation / Enhancement</u>	<u>Landscape compensation measures are considered in relation to the mitigation hierarchy but there is no requirement under policy to compensate for all residual effects.</u> <u>The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then falls</u>	<u>Norfolk County Council has strongly argued that policy requires landscape compensation in the Waveney Valley. Our position is set out in [REP5-256]. The starting point, in policy terms, is that the mitigation hierarchy applies in relation to adverse impacts affecting the</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>to the planning balance.</u> <u>7.4 Outline Landscape and Ecological Management Plan [Revision G] confirms offsite 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.</u> <u>The Applicant's position on wider landscape 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 [Revision A].</u> <u>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).'</u> <u>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 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].</u> <u>The Applicant is however engaging with NCC on</u>	<u>environment or biodiversity. This requires both the applicant and decision-maker to consider any measures to avoid, reduce, mitigate or compensate for such adverse impacts – see EN-1 paragraphs 4.1.5, 4.2.23, 4.2.24, 4.2.25, 4.3.4; and EN-5 paragraphs 2.1.1, 2.1.6. In particular:</u> <u>• Paragraph 4.2.24 of EN-1 states in terms that "Applicants must apply the mitigation hierarchy and demonstrate that it has been applied" (emphasis added); and this is echoed at paragraph 2.1.6 of EN-5.</u> <u>• Paragraph 4.2.25 of EN-1 further clarifies that "applicants should set out how residual impacts will be compensated for as far as possible" (emphasis added).</u> <u>• The mitigation hierarchy is further emphasised in the context of environmental effects (paragraph 4.3).</u>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>a mechanism to secure the compensation measures should they be considered necessary and will continue these discussions.</u>		
EIA – Assessment Conclusions				
3.8.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226 <u>Revision B</u>]. The assessment of effects during construction presented is considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in January 2026.	Agreed
3.8.11	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 [APP-226 <u>Revision B</u>]. The assessment of effects during operation (and maintenance) presented is considered appropriate.	NCC consider this matter to be agreed.	Agreed
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.8.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164 <u>Revision G</u>] includes all relevant construction related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226 <u>Revision B</u>] and is appropriate for managing construction impacts from the Project.	NCC consider this matter to be agreed.	Agreed
3.8.13	Outline LEMP	7.4 Outline Landscape and Ecological Management Plan [Revision E <u>G</u>] includes all relevant operational related mitigation measures specified in 6.13 Environmental Statement Chapter 13 - Landscape and Visual	NCC consider this matter to be agreed.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		[APP-226 Revision B] and is appropriate. The Applicant awaits further correspondence, and will continue to engage with NCC on this matter.		
Other matters as required				

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	Norfolk 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 Socio-economics, Recreation and Tourism assessment is presented in 6.2 Environmental Statement Chapter 2 - Key Legislation and Planning [APP-126 Revision B] and Section 15.2 of 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265 Revision C]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC consider this matter to be agreed.	Agreed
EIA – Approach and Methods				
3.9.2	Study area	6.20 Scoping Opinion [APP-297] stated: “The Applicant should seek to agree the study area with the relevant local authorities”.	Email dated 10 October 2024 confirmed that NCC were in agreement on the scope and methodology regarding Socio-Economics,	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024. Following the meeting held in November 2024, the Applicant agreed that the study area for businesses would be expanded from 1 km to 3 km to take into account potential visual effects on businesses. A third Technical Note was issued in March 2025 to seek to agree the study area and methodology.	Recreation and Tourism as laid out in the Technical Note.	
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 [APP-265Revision C].	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed
3.9.4	Assessment methodology	6.20 Scoping Opinion [APP-297] stated <i>"The Applicant should seek to agree the study area with the relevant local authorities"</i> and <i>"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"</i>. A meeting was held in November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024. A third Technical Note was issued in March 2025 to seek to agree the study area and methodology.	Email dated 10 October confirmed that NCC were in agreement with the scope and methodology regarding Socio-Economics, Recreation and Tourism as laid out in the Technical Note.	Agreed
3.9.5	Key parameters and	Key parameters and assumptions associated	NCC advised they were in agreement with	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	assumptions	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 [APP-265Revision C] . The key parameters and assumptions presented are considered appropriate.	this matter during a meeting held in February 2026.	
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 [APP-265Revision C] . The baseline conditions and receptors presented are considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed
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 [APP-265Revision C]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant's position on airfields is included in Section 3.17 'Safety and Security – Airfields' of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. <u>The Applicant's</u>	This matter remains under discussion pending further information regarding airfields <u>Norfolk County Council would like to see mitigation agreed between the applicant and the operators of Tibenham and Priory Farm Airfields to reduce the impact of the project on these aerodromes to an acceptable level. NCC understands that no agreement has been reached.</u>	Under discussion No t agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>Response to SS 2.3 and SS 2.7 within 8.9.2 Applicant's Responses to Second Written Questions [REP5-211]</u> (see pages 213 to 214 and 228 to 232) describe the Applicant's specific positions regarding continued engagement with Tibenham and Priory Farm aerodromes and the Applicant's proposals for appropriate mitigation of residual risk, including via changes to aerodrome operational procedures. The Applicant will be submitting updated and final Statements of Common Ground for both aerodromes at Deadline 7. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
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 [APP-265Revision C] and set out in 7.2 Outline Code of Construction [REP4-164Revision G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	<u>NCC consider this matter to be agreed.</u>	Agree
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 [APP-265Revision C]. Additional mitigation is considered appropriate and adequate, in terms	NCC consider this matter to be agreed.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		of its nature and scale, to address potential effects. In response, and to elaborate on what the Applicant set 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 host authorities and submitted 8.13 Outline Employment and Skills Plan [Revision A]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.		
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 [APP-265]Revision C. The assessment of effects during construction presented is considered appropriate.	NCC advised they were in agreement with this matter during a meeting held in February 2026.	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 [APP-265]Revision C. The assessment of effects during operation (and maintenance) presented is considered appropriate.	This matter remains under discussion pending further information regarding airfields Norfolk County Council would like to see mitigation agreed between the applicant and the operators of Tibenham and Priory Farm Airfields to reduce the impact of the project on these aerodromes to an	Under discussion Not agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		The Applicant's position on airfields is included in Section 3.17 'Safety and Security – Airfields' of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. <u>Please see Matter 3.9.7 for updates in relation to aerodromes.</u> <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>	<u>acceptable level. NCC understands that no agreement has been reached.</u>	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.9.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164Revision G] includes all relevant construction related mitigation measures specified in 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265Revision C] and is appropriate for managing construction impacts from the Project.	NCC advised they were in agreement with this matter during a meeting held in February 2026.	Agreed
Other matters as required				
3.9.13	Employment and skills plan	Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment	NCC consider this matter to be agreed.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Strategy would not be proportionate or necessary for the Project. In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant has prepared and submitted an 8.13 Outline Employment and Skills Plan into the Examination [REP5-215] 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 has engaged with host authorities to inform the content of the Employment and Skills Plan.		

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	Norfolk County Council's Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
3.10.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in 6.2 Environmental Statement Chapter 2 (= Key Legislation and Planning Policy Context) [Revision B] and Section 16.2 of 6.16	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
EIA – Approach and Methods				
3.10.2	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.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.3	Data sources	The 7.11 Transport Assessment [APP-333] includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (2019-2023). A review of the latest available collision data including 2024 and 2025 has been undertaken to understand whether there are any changes to cluster sites along the junctions as well as on the Primary Access Routes. The Applicant has and will continue to engage with Norfolk County Council on this matter. Traffic data used within the 7.11 Transport Assessment [APP-333] and the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in	<i>Understood Position from Local Impact Report February 2026:</i> <i>“NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour.”</i> <u>NCC confirmed via email in July 2026 that they had no further comments on the matters discussed in TA Addendum.</u>	Under discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		relation to remodelling of the junction. The Applicant has and will continue to engage with Norfolk County Council on the findings of this assessment. <u>7.11.1 Transport Assessment Addendum [REP5-165]</u> was submitted during the examination at Deadline 5 which provides further clarity on the data sources used. Based on the above, The Applicant proposes that this matter is moved to Agreed.		
3.10.4	Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the 6.19 Scoping Report [APP-288] to [APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate. A standalone PRow chapter has not been included in the Environmental Statement (ES) as PRow related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRow issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals. National Grid will continue to engage with NCC on this matter. In addition, the 7.6 Outline Public Rights of Way Management Plan [REP4-178] <u>Revision D</u> has been prepared to set out the proposed approach to the management of PRow during construction of the Project. This is developed as a standalone document and it is expected that the final PRow Management Plan, to be developed by the Main Works Contractor ahead	NCC agreed to the principle of the inclusion of the Outline Public Rights of Way Management Plan instead of a PRow standalone chapter in the ES during a meeting in May 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		of the commencement of construction activities, will also be a standalone document. The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed		
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 [APP-271Revision B]. The key parameters and assumptions presented are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Baseline Conditions				
3.10.6	Baseline conditions and receptors	The baseline conditions and receptors for Traffic and Transport are presented in Section 16.5 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B]. The Applicant has undertaken a further review of the data sets for collisions and traffic data. The 7.11 Transport Assessment [APP-333] includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (SRN) (2019-2023). However, following engagement with National Highways further analysis was undertaken at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road and Site 12 A11 Thetford Bypass / A1066 Mundford Road SRN junctions for a full 60-month period excluding the period between March 2020 and September 2021, that is between January 2019 and June 2025. A review of the latest	<i>Understood Position from Local Impact Report February 2026:</i> <i>“NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour.”</i> <u>NCC confirmed via email in July 2026 that they had no further comments on the matters discussed in TA Addendum.</u>	Under Discussion <u>Agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		available collision data including 2024 and 2025 has also been undertaken along all Primary Access Routes within Norfolk to understand whether there are any changes to cluster sites. The Applicant confirms that traffic data used was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction. The Applicant has engaged with Norfolk County Council on this matter and the findings of this additional assessment will be submitted at Deadline 4. Following this review the baseline conditions and receptors presented are considered appropriate and the conclusions of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] remain valid. The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed-7.11.1 Transport Assessment Addendum [REP5-165]<u> was submitted during the examination at Deadline 5 which provides further clarity on the data sources used. Based on the above, The Applicant proposes that this matter is moved to Agreed.</u>		

EIA – Embedded, Standard and Additional Mitigation Measures

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
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 [APP-271Revision B]. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	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 [APP-271Revision B] and set out in 7.2 Outline Code of Construction Practice [REP4-164Revision G]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	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 [APP-271Revision B]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
EIA – Assessment Conclusions				
3.10.10	General Construction effects	The Applicant acknowledges NCC's concerns relating to Diss on PAR 8, and notes that this is discussed in detail under matter 3.10.55. Construction effects notwithstanding have been assessed by The Applicant in relation to driver delay and public transport	<i>Understood Position from Local Impact Report February 2026:</i> <i>"NCC is concerned that the effect of exceeding junction capacity on PAR 8 will cause risks to road safety and worsen driver</i>	<i>Under- Discussion</i> Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>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 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].</u> The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction traffic through Diss at peak times when there may be an interaction with a greater number of sensitive receptors along PAR 8 such as schools as detailed within 6.16.A2 Environmental Statement Appendix 16.2 - Traffic and Transport Baseline Conditions [APP-273]. The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion and delay at junctions along the A1066 through Diss as	<i>delay by a degree that is underestimated in the ES."</i> <u>NCC agreed to the general construction effects assessments during a meeting in June 2026, noting that the effects around Diss and PAR 8 are included below as a separate issue.</u>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		identified by the modelling presented within 7.11 Transport Assessment [APP-333]. Based on the modelling, there is no predicted step change in junction performance at junctions along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during construction would not materially change or create additional safety risks due to the minimal increase in traffic. <u>Excluding the effects around Diss, which are detailed under 3.10.55, The Applicant proposes this matter is moved to Agreed for general construction effects.</u>		
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.10.11	Outline CoCP	7.2 Outline Code of Construction Practice [REPA-164Revision G] includes all relevant construction related mitigation measures specified in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] and is appropriate for managing construction impacts from the Project. Meeting held on 9th October to agree on the structure for 7.2 Outline Code of Construction Practice [REPA-164].	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
3.10.12	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 3	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		of 7.11 Transport Assessment [APP-333] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
Transport Assessment – Approach and Methods				
3.10.13	Study Area	The study area comprises all roads along the PARs, Wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, 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] . The Study Area is considered appropriate for the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.14	Multimodal Strategy	A multi-modal assessment has been undertaken to examine opportunities to use rail and water-borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented within 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340] . The multi-modal assessment is considered appropriate and sufficiently covers the need to consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.15	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	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		junctions with a traffic model as presented Section 6.9 (Construction Traffic Assessment Methodology) of the 7.11 Transport Assessment [APP-333]. This involved a preliminary 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.		
3.10.16	Junction Modelling	The methodology used for undertaking junction assessments is presented in Section 6.9 (Construction Traffic Assessment Methodology) of 7.11 Transport Assessment [APP-333]. The assessment methodology used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.17	Assessment of WCH	The assessment of WCH impacts as a result of the Project is presented in Section 7.4 (Walkers, Cyclists and Horse riders network) of 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-271Revision B] and 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275Revision B]. The assessment methodology used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.10.18	Impact on Parking	The methodology for the assessment of impacts to on-street parking is presented within Section 6.5 (on Street Parking) of 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.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.19	Road Safety	The methodology for the assessment on Road Safety is set out in Section 4 (Existing Baseline Transport Conditions) of 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 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 [REP4-174Revision F] The assessment methodology used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment – Mitigation Measures				
3.10.20	Mitigation	The 7.3 Outline Construction Traffic	NCC refers to comments raised on the draft	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Measures	Management Plan [REP4-174Revision F] 2.4.4 has been updated to clarify: <i>"Other works on the public highway, this could include:</i> • <i>–Cutback/clearance of vegetation</i> • <i>–Utility diversion works in the locations of bellmouth accesses</i> • <i>–Use of stop/go boards instead of temporary traffic lights</i> • <i>–Construction of the highway mitigation measures, or site access points, or haul road crossing points"</i> The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	CTMP shared in May 2025. NCC's comment was raised on item 2.4.4 of the draft CTMP: <i>"other works on the public highway – clarification required"</i>. NCC confirmed their agreement with National Grid's response to their comments in February 2026.	Agreed
Transport Assessment – Baseline Conditions				
3.10.21	Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Transport Assessment is presented in Chapter 3 (Key Planning Policy Context) of 7.11 Transport Assessment [APP-333]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.22	Baseline conditions	The baseline conditions and sensitive receptors for Traffic and Transport are presented in Section 4 (Existing Baseline Transport Conditions) of 7.11 Transport Assessment [APP-333] and are considered appropriate.	<i>Understood Position from Local Impact Report February 2026:</i> <i>"NCC requires that the Applicant updates its transport baseline to use more recent and representative collision and traffic data rather</i>	Under- Discussion Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		The Applicant has undertaken a further review of the data sets for collisions and traffic data. 7.11 Transport Assessment [APP-333] includes the assessment for the pre-covid period only for those junctions that connect to the Strategic Road Network (SRN) (2019-2023). However, following engagement with National Highways further analysis was undertaken at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road and Site 12 A11 Thetford Bypass / A1066 Mundford Road SRN junctions for a full 60-month period excluding the period between March 2020 and September 2021, that is between January 2019 and June 2025. A review of the latest available collision data including 2024 and 2025 has also been undertaken along all Primary Access Routes within Norfolk to understand whether there are any changes to cluster sites. The Applicant confirms that traffic data used was post-COVID using Department for Transport (DfT) 2023 counts and supplemented by ATC and Manual Classified Counts (MCC) surveys carried out in 2023 and 2024. An additional MCC has been carried out at Site 1 A47 Norwich Southern Bypass/A140 Ipswich Road in 2025 in relation to remodelling of the junction. The Applicant has engaged with Norfolk County Council on this matter and the findings of this additional assessment will be submitted at Deadline 5. <u>7.11.1 Transport Assessment Addendum [REP5-165]</u> was submitted during the examination at <u>Deadline 5</u> which provides further clarity on the	<i>than relying on pre COVID datasets from 2019, which may no longer reflect current patterns of travel behaviour."</i> <u>NCC confirmed via email in July 2026 that they had no further comments on the matters discussed in TA Addendum.</u>	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>data sources used. Based on the above, The Applicant proposes that this matter is moved to agreed.</u>		
Transport Assessment – Future Baseline Conditions				
3.10.23	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 7.11 Transport Assessment [APP-333] . Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.24	Cumulative Developments	The committed developments included within the cumulative assessment for the future baseline year are presented in Chapter 5 (Future Baseline) of 7.11 Transport Assessment [APP-333] . These have been derived through a review of local authority planning portals, information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
Transport Assessment – Trip Generation				
3.10.25	Key Assumptions	Key assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] and Section 6.7 of	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Chapter 6 of 7.11 Transport Assessment [APP-333] . The key assumptions presented are considered appropriate.		
3.10.26	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 7.11 Transport Assessment [APP-333] is considered suitable and robust.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.27	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in Section 6.3 (Construction Vehicles Overview) of 7.11 Transport Assessment [APP-333] . The trip generation is considered appropriate.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.28	Construction Workforce Trips	The total peak number of construction workers that will be on the Primary Access Routes (PAR) within the county of Norfolk is estimated to be 250. This is NOT the total per PAR. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC's comment on this topic was as follows: <i>"Norfolk Construction Workers Peak of 250+ - is this over the whole route of certain locations?"</i> NCC confirmed their agreement with National Grid's response to their comments in February 2026.	Agreed
Transport Assessment – Conclusions				
3.10.29	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] .	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		National Grid considers the conclusions to be appropriate whilst noting that NCC has outstanding comments on Diss.		
Outline Construction Traffic Management Plan (CTMP)				
3.10.30	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in Section 3 of 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F]. These are considered to be clear and sufficient for the delivery of the Project. NCC did not raise any comments related to Project Team Roles and Responsibilities (Section 3) in the draft CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] was updated as part of the DCO submission in August 2025.	No comments	Agreed
3.10.31	Pre-and Post Construction Surveys	The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] section 5.2.2 notes that the scope of these surveys (including methodology) will be agreed with each Local Highway Authority. The presence of a highway representative or area engineers is anticipated to form part of discussions on the scope of the surveys. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC's comment was raised on items 5.2.2 and 5.2.3 of the draft CTMP: "<i>Highway Representatives or area engineers to be present during surveys?</i>" NCC confirmed their agreement with National Grid's response to their comments in February 2026.	Agreed
3.10.32	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 [REP4-174Revision F]. These traffic	Understood Position from Relevant Representation November 2025: <i>"The promoter should liaise directly with stakeholders on traffic management and</i>	Agreed

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		management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts. NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft Outline CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] was updated for the DCO submission in August 2025. Section 5.8 of the updated document details that the exact management, timings and locations of the proposed traffic management will be discussed and agreed with the Local Highway and Street Authorities. The Traffic Management will be secured through the use of Permit Schemes for each Local Highway Authority, where direct liaison is required.	<i>mitigation."</i>	
3.10.33	Implementation/ Enforcement	The implementation and enforcement process set out in Section 6 of the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] is considered to be appropriate and adequate for the Project. NCC did not raise any comments related to implementation and enforcement process set out in Section 6 of the draft Outline CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] was updated for the DCO submission in August 2025.	No comments	Agreed
Outline Construction Workers Travel Plan (CWTP)				
3.10.34	Policy	The Policy Review (Section 3) within the 7.3 Outline Construction Traffic Management	NCC refers to comments raised on the draft CTMP shared in May 2025.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C] has been updated to detail that the policies listed are normally in reference to development sites but have been used as indicative guidelines for the development of the Outline CWTP. For each section of policy, a comment has been added to detail what has been taken from it, to inform the Outline CWTP. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	NCC's comment was raised on items 4.3.5 and 4.3.6 of the draft CWTP: <i>"Local travel plans for developments not NSIPS, DCO and CWTP will cover this"</i>. NCC confirmed their agreement with National Grid's response to their comments in February 2026.	
3.10.35	Site Accessibility Review	Table 4.1 has been updated within the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C] to remove "bus" as an access option for Norwich Substation due to the criteria detailed in 4.2.2. For clarity, this was previously Table 5.1 in the draft CWTP (May 2025). The Applicant is continuing discussions with NCC with regards to the provision of a minibus service for the site near Dunston Hall and Norwich Substation.	NCC agreed this matter in a meeting in May 2026, following the inclusion of updated wording in the CTMP.	Agreed
3.10.36	Targets, Strategy, and Measures	The 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C] has been updated to include measures for monitoring the targets set. As set out in Section 8.2.2 of the Outline CWTP the modal split information will be used to monitor travel choices to and from site. The information on the Travel Plan targets will be sent	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC raised comments on item 8.2.2 of the draft CWTP: <i>"60% of workers share transport, how will this be captured/monitored."</i>, and on item 7.2.7 of the draft CWTP: <i>"Public transport but needs to be close to locations, if not how do workers get from stop to site Mini-bus shuttle runs?"</i>.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		to the relevant Local Highway Authorities at regular intervals (anticipated to be quarterly) in the form of a monitoring review report. The 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C] 7.2.7 details "Prior to construction the TPC will work with the relevant LHA travel planning teams to identify whether site worker discounted bus and travel tickets can be applied for to encourage more staff to travel by public transport". The Travel Plan Coordinator will look into options for travelling via public transport and what measures may be required; this could include a mini-bus or shuttle service from local public transport hubs. Further detail will be included in the updated Construction Worker Travel Plan to be developed by the Main Works Contractor. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	NCC confirmed their agreement with National Grid's responses to their comments in February 2026, and agreed this matter during a meeting in May 2026. NCC is satisfied that monitoring of worker modal split will be as captured in the CTMP, and that quarterly updates are sufficiently frequent.	
3.10.37	Monitoring and Review	The proposed monitoring and review process is set out in Section 8 of the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C]. This is considered to be suitable and appropriate, given the present stage of Project development. NCC did not raise any comments related to Monitoring and Review (Section 9) of the draft Outline CWTP (May 2025). The CWTP was	NCC to review the updated Outline Construction Worker Travel Plan [APP-311] submitted in August 2025. NCC agreed this matter in a meeting in May 2026, following the inclusion of updated wording in the CTMP.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		updated for the DCO submission in August 2025. This matter is discussed in Section 8 (Monitoring and Review) of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311Revision C]. National Grid will continue to engage with NCC on this matter. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.		
Construction Access Strategy and Design				
3.10.38	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 [REP4-174Revision E]. This approach is considered to be suitable for construction traffic for the Project. National Grid confirms that access to the pylons throughout the construction will be via the Primary Access Routes, and the haul roads, following the routeing strategy detailed in the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F]. The use of haul routes is the favourable solution for access as described in the General Construction Routeing Strategy (Section 5.4) of the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F]. This strategy reduces the number of site access	NCC refers to comments raised on the draft CTMP shared in May 2025. <i>Understood Position from Relevant Representation November 2025:</i> <i>"We require clarification as to whether temporary access to pylons during construction will be directly from the highway network or via haul routes. We also require clarification as to whether maintenance access during the operational phase will be through existing field accesses or whether new access points are required."</i> <i>"NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic."</i> NCC agreed this matter in a meeting in May 2026, following the inclusion of updated	Agreed

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		points on the public highway network. Maintenance access during the operational phase will be via existing field accesses. Access would typically be made on foot, by 4x4 or by tractor and trailer. Further details on operation and maintenance access can be found within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130Revision B]. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	wording in the CTMP.	
3.10.39	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the Indicative Highway Mitigation Plans in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320-319, REP 4-172 and REP4-173]. These have been discussed with NCC 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 [REP4-174Revision F]. Responses are provided below for each location raised: A140 Ipswich Road (Link PAR 1) Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] only the section of the A140 Ipswich Road between the A147 road and Mangreen Lane needed to be assessed. The bridge over the	<i>Understood Position from Relevant Representation November 2025:</i> <i>“NCC have highlighted several routeing constraints:</i> <i>The A140 Ipswich Road (Link PAR 128) has a weight restricted railway bridge south of the access, which must be treated as a highway restraint. PAR 1 (A140 Ipswich Road) is part of the Major Road Network and therefore should be treated as a sensitive link.”</i> NCC agreed this matter in a meeting in May 2026, following confirmation of the PAR 1 access arrangements.	Agreed

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		railway is south of this location and therefore will not affect the sensitivity of Link PAR 1.		
3.10.40	Primary Access Route Selection	A140 Ipswich Road / Mangreen Lane National Grid notes the right-turn issues at A140 Ipswich Road and Mangreen Lane (Site 2). Within 7.11 Transport Assessment [APP-333] the results of the junction capacity assessments at Site 2 identified the need for mitigation in the form of avoiding the AM peak hour due to the insufficient right turn capacity to accommodate predicted future year increased queues. The proposed highway mitigation at this junction is limited to vegetation clearance to achieve visibility splays, as shown in the Indicative Highway Mitigation Plans within 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320-319, REP4-172 and REP4-173].	<i>Understood Position from Relevant Representation November 2025:</i> <i>The Highway Authority is aware of existing right turn issues at A140 Ipswich Road/Mangreen Lane (Site 2).</i> NCC agreed this matter in a meeting in May 2026, following confirmation of the PAR 1 access arrangements.	Agreed
3.10.41	Primary Access Route Selection	B1134 Station Road / Long Row Network Rail have confirmed that 'The track will have no limitations up to 250kN wheel load on each rail, assuming the track bed and track components are in good condition.' The level crossing sits on the public highway and has been designed to accommodate typical highways movements such as HGVs. However, the contractor will undertake detailed structural assessments of the loading on the track components and the track panels to ensure suitable capacity for HGVs and the mobile Crane Abnormal Indivisible Load.	<i>Understood Position from Local Impact Report February 2026:</i> <i>"At B1134 Station Road/Long Row (PAR 7), additional traffic cannot be assumed to be acceptable until Network Rail confirms capacity at the level crossing. Pending that, increased HGV movements may pose a safety risk and cause delays."</i> NCC agreed this matter in a meeting in May 2026, following confirmation that engagement with Network Rail is being undertaken by The Applicant.	Agreed

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3.10.42	Primary Access Route Selection	<u>The Applicant's proposed routing and strategy for access in Norfolk has been informed by regular engagement with the Local Highway Authority, since 2023, as summarised within the Transport Assessment record of engagement 7.11 Transport Assessment – Appendix B – Consultation on the Scope of the Assessment [APP-335].</u> <u>The Applicant has conducted a rigorous assessment process to identify the most suitable roads for use as Primary Access Routes for vehicles to use to travel between the Strategic Road Network / Major Road Network, and the works areas. This has included consideration of constraints, swept path analysis, proposals for highway mitigation works where identified to be necessary, and continued engagement with the Local Highway Authority.</u> A1066 at Diss (PAR 8) The Applicant has undertaken an assessment on the proposed construction access strategy through and around Diss. PAR 8 was chosen as an access route due to the construction corridor being aligned with the A140, and other Primary Access Routes being routed off the A140. The Applicant anticipates that there will be deliveries that need to access the construction compound south of Diss and those off PAR 6. If HGVs were only to be routed via Thetford (PAR 9), they would be subject to a 103 km diversion, with an additional journey time of 1 hour to 1 hour 40 minutes in the peak periods, which would route vehicles on busy parts of the network	<i>Understood Position from Local Impact Report February 2026:</i> <i>"NCC also seeks a commitment that all HGV traffic accessing the A1066 crossing point be routed via PAR 9, which both reduces safety risks and complies with EN-1's expectation that applicants reroute traffic to less-busy parts of the network where appropriate.</i> <i>NCC is concerned that there could be safety and driver delay implications to the applicant's proposed use of PAR 8 for heavy goods vehicles ("HGVs"), as many of the junctions on that route are already over capacity. The applicant proposes that the split in HGV traffic between PAR 8 and PAR 9 is 50:50 at off-peak times and 100% via PAR 9 during PAR 8's network peak hours. In NCC's view PAR 9 is more suitable for HGV traffic at all times due to capacity constraints and also the more urban character of the A1066 through Diss.</i> <i>NCC is concerned that the effect of exceeding junction capacity on PAR 8 will cause risks to road safety and worsen driver delay by a degree that is underestimated in the ES. Table A16.4.2 in ES Appendix 16.4 – Traffic and Transport Construction Effects shows an assessment that effects on driver delay for PAR 8 are not significant on the basis of magnitude of change. Where the comments in Table A16.4.2 indicate that effects on driver delay for PAR 9 have been adjusted down on the basis of detailed modelling, it is notable</i>	Under- Discussion <u>Agreed</u>

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		inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (January 2024) states that any mitigation (including re-routing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option, would not comply with policy EN-1. Light goods vehicles are required to use the A1066 through Diss to access the haul road to the north of the River Waveney. There is a Main Site Compound to the south of Diss, where overhead line construction workers will be reporting for work, before travelling through Diss on the A1066 to access the haul road. If construction workers in LGVs are unable to travel along the A1066 through Diss, they will be required to drive an additional 1hr40minutes to access the haul road. This is unfeasible given that construction workers are expected to travel outside of peak hours. It is expected that these movements will be by crew vehicles carrying six, thus minimising the number of trips. The Applicant confirms that one collision involving a pedestrian was recorded on PAR 8 and was considered within the assessment undertaken within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction	<i>that a converse exercise has not been done for PAR 8. This is despite an acknowledged high receptor sensitivity and substantial effects on driver delay and capacity shown in the detailed modelling."</i> <u>NCC agreed to Primary Access Route selection during a meeting in June 2026, noting that the effects around Diss and PAR 8 are included below as a separate issue.</u>	

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		traffic through Diss at peak times when there may be an interaction with a greater number of sensitive receptors along PAR 8 such as schools as detailed within 6.16.A2 Environmental Statement Appendix 16.2 – Traffic and Transport Baseline Conditions [APP-273]. The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion at junctions along the A1066 through Diss as identified by the modelling presented within 7.11 Transport Assessment [APP-333]. NCC is concerned that there could be safety and driver delay implications to the applicant's proposed use of PAR 8 for heavy goods vehicles ("HGVs"), as many of the junctions on that route are already over capacity. The applicant proposes that the split in HGV traffic between PAR 8 and PAR 9 is 50:50 at off-peak times and 100% via PAR 9 during PAR 8's network peak hours. In NCC's view PAR 9 is more suitable for HGV traffic at all times due to capacity constraints and also the more urban character of the A1066 through Diss. Based on the modelling, there is no predicted step change in junction performance at junctions		

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		along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during construction would not materially change or create additional safety risks due to the minimal increase in traffic. <u>With the exception of NCC's concerns relating to PAR 8, which is discussed in further detail under item 3.10.55, The Applicant proposes that this matter is moved to Agreed relating to general Primary Access Route Selection.</u>		
3.10.43	Construction Access and Crossover Design	The proposed strategy for providing access for the construction of the Project proposals is set out in 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F]. This aligns with the position stated by Norfolk County Council through the proposed usage of a limited number of specified Primary Access Routes (PARs) and Site Access Points (SAPs) to access a construction corridor served by a largely continuous haul road along the length of the proposed alignment. Under this approach, construction traffic will be restricted to the designated PARs when not utilising main roads forming part of the Strategic Road Network (SRN) or Major Road Network (MRN). Adherence to these routes forms commitment T03 in 7.2 Outline Code of Construction Practice [REP4-164Revision G]. On this basis,	<i>Understood Position from Relevant Representation November 2025:</i> <i>"NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic."</i> <i>Understood Position from Local Impact Report February 2026:</i> <i>"Construction access taken directly from rural roads would increase conflict points, introduce turning movements at unsuitable locations, and elevate risks to vulnerable road users. Use of haul roads is therefore critical to minimising highway safety impacts. Otherwise, the result would be additional</i>	Agreed

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		interactions between construction traffic and local roads not part of the specified PARs will be limited to locations where construction traffic on the haul road crosses local roads. Preliminary designs for each of the site access points and crossover points have been developed and have been subject to the Road Safety Audit (RSA) process set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. The RSA process considers safety risks including turning conflicts and potential congestion at each of the proposed site access points and crossover points. For those locations in Norfolk, the Applicant has engaged with Norfolk County Council as the Overseeing Authority in the development of these RSAs. 2.6.3 Design and Layout Plans - Traffic and Transport [APP-043] shows an illustrative site access point layout. The plans provide indicative details that the Main Works Contractor may consider while undertaking the detailed design of each site access point. The detailed design should be sympathetic to surroundings, meet safety, security and welfare requirements, and appropriately cater for the expected traffic movements. The Applicant proposes this matter is agreed.	<i>congestion, turning conflicts, and safety risks on minor roads across rural Norfolk.”</i> Understood Position from SOCG Review Meeting January 2026: <i>“NCC requests for the designs of proposed accesses to be sympathetic to the surroundings and appropriate for the construction traffic expected. NCC have highlighted previous experience of past projects that have established overdesigned accesses, leading to unnecessary additional work and further impacts to the surroundings throughout the construction period.”</i> NCC agreed this matter in a meeting in May 2026.	
3.10.44	Highway Mitigation Design	Mitigation measures proposed on the Public Highway are described in Section 5 of the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] and are further set	No comments	Agreed

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		out in the following 3.1 Draft Development Consent Order [REP4-037DCO [Revision G]. Schedules: - Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout. - Schedule 6, Part 2 - Streets 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 [REP4-174Revision F]), specific designs have been developed for these locations. These designs were discussed with NCC during an engagement session in April 2025, and further to this, Stage 1 Road Safety Audits have been undertaken for each location, overseen by NCC. These locations are considered to be suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with NCC as the Overseeing Authority. NCC did not raise any comments related to Traffic Management (Section 5.8) in the draft CTMP (May 2025). The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] was updated for the DCO submission in August 2025.		
3.10.45	Traffic	Section 2.3 of the 7.3 Outline Construction	NCC refers to comments raised on the draft	Under-

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Management – core working hours	Traffic Management Plan [REP4-174Revision F] includes a specific list of operations that may take place outside of the core working hours. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed. <u>The Applicant recognises that a mutually agreed position is unlikely to be reached, and therefore proposes this matter be moved to Not Agreed.</u>	CTMP shared in May 2025. NCC raised comments on item 2.3.2 of the draft CTMP: “A large number of works are to be scheduled outside of core working hours”. NCC confirmed their agreement with National Grid’s responses to their comments in February 2026. <u>NCC consider this matter as Not Agreed following discussions during a meeting in June 2026.</u>	<u>Discussion Not Agreed</u>
3.10.46	Traffic Management	Section 2.3 of the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] includes more detail on the handling of Heavy Goods Vehicles travelling outside of the core working hours. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed. <u>The Applicant recognises that a mutually agreed position is unlikely to be reached, and therefore proposes this matter be moved to Not Agreed.</u>	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC raised comments on item 2.3.1 of the draft CTMP: “happy with HGVs travelling outside working hours to get to site, but times/dates as per 2.3.1 to be clarified”. NCC confirmed their agreement with National Grid’s responses to their comments in February 2026. <u>NCC consider this matter as Not Agreed following discussions during a meeting in June 2026.</u>	<u>Under-Discussion Not Agreed</u>
3.10.47	Traffic Management	The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] details that construction worker LGVs are assumed to travel before 7am and after 7pm, with 50% of the workforce leaving within the working day. Admin staff are assumed to work more "traditional" timings and may travel to site compounds within peak periods. The HGV activities which can take place outside core hours	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC raised comments on item 5.4.13 of the draft CTMP: “LGV and HGVs outside peak hours”. NCC confirmed their agreement with National Grid’s responses to their comments in February 2026.	<u>Under-Discussion Not Agreed</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		are detailed in Section 2.3 of 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] and Requirement 7(4) of Schedule 3 to 3.1 Draft Development Consent-Order [REP4-037DCO [Revision G]. HGVs not associated with these activities will be restricted to the hours set out in Requirement 7(3) of Schedule 3 to 3.1 Draft Development Consent-Order [REP4-037DCO [Revision G]. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.<u>The Applicant recognises that a mutually agreed position is unlikely to be reached, and therefore proposes this matter be moved to Not Agreed.</u>	<u>NCC consider this matter as Not Agreed following discussions during a meeting in June 2026.</u>	
3.10.48	Traffic Management	The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] no longer includes Image (Figure 5.1). National Grid has undertaken a review from a highways perspective of the Primary Access Routes following the conclusion of the trip generation and assessment. For Mangreen Lane, National Grid has identified a green mitigation measure (Constraint number A1 identified on Sheet 1 of the 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans – Section A [APP-313]) where there is narrow width for design vehicles with poor visibility. The proposed mitigation is to cut back vegetation to increase visibility around the bend. The priority junction with Mangreen Lane and A140 Ipswich Road has	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC raised comments on Image 5.1 of the draft CTMP: <i>“Is Mangreen okay to take the additional 450 vehicles, as discussed cumulative impact with SEPDEP”</i>. NCC confirmed their agreement with National Grid’s responses to their comments in February 2026. NCC agreed this matter in a meeting in May 2026.	Agreed

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		been assessed within the 7.11 Transport Assessment [APP-333], with mitigation proposed to avoid the AM peak and redistribute the flows across the off-peak periods. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.		
3.10.49	Traffic Management	The 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] no longer includes the Image (Figure 5.3). National Grid has undertaken a review of the Primary Access Routes (PARs) from a highways perspective following the conclusion of the trip generation and assessment. The review assessed both the B1113 (PAR 4) and Fundenhall Road (PAR 6) as not sensitive. The total traffic increases on both PARs is below the 30% assessment threshold (IEMA Guidelines Rule 1).	NCC refers to comments raised on the draft CTMP shared in May 2025. NCC raised comments on Image 5.2 of the draft CTMP: <i>"Image 5.2 HA03 - Fundenhall/B1113 will these roads be able to take up 350 movements for 3 months."</i> NCC agreed this matter in a meeting in May 2026.	Agreed
3.10.50	Traffic Management	The Applicant anticipates that the signage (additional details on types of signage are included within 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] will be in place for as long as construction is taking place at RG56. Duration of signage will be discussed and agreed between Norfolk County Council and the Main Works Contractor. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	Although paragraph 16.5.35 of [APP-271] indicates collision rates are generally on par with national averages and Table 16.11 outlines mitigation (e.g., signage), clarification is requested on whether such measures will be maintained for the full operational period of RG56. NCC agreed this matter in a meeting in May 2026, noting that any details on signage will need to be agreed with Norfolk County Council,	Agreed
3.10.51	Traffic	The Applicant has developed 7.3 Outline	<i>Understood Position from Local Impact</i>	Under

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Management	Construction Traffic Management Plan [REP4-174]Revision F in consultation with Norfolk County Council. 7.3 Outline Construction Traffic Management Plan [REP4-174]Revision F details that it is expected that the Main Works Contractor(s) will monitor the number of construction vehicles accessing the site, with the potential for the data collected to be used for auditing. The monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which could cause material effects can be identified and discussed with the relevant Local Highway Authority where appropriate. HGV drivers not using the Primary Access Routes (PARs) and parking or waiting in inappropriate locations have been identified as matters for non-compliance, that would be investigated, and data recorded and issued quarterly to the Local Highway Authorities. 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 daily assessment, to be transparent in the expected trips along each construction route. This exercise allowed the traffic and environmental impact assessment to be completed on robust and credible trip generations across the whole construction programme and the results of these assessments are presented within 7.11 Transport Assessment [APP-333] and 6.16	Report February 2026: <i>"Policy context</i> <i>• Paragraph 5.14.15 provides a framework for requirements which the SoS may attach to consents which would result in substantial HGV traffic. These requirements may:</i> <i>Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;"</i>	Discussion

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		Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B]. The Applicant has sought to provide the most up-to-date assessments, based on the design and construction programmes available at the time the assessments were completed, and they have had due regard to feedback from stakeholders, including the Local Highway Authorities, through the Traffic and Transport Working Groups. The Applicant has stated within 7.3 Outline Construction Traffic Management Plan [REP4-174]: '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, asRevision F]. The 7.3 Outline Construction Traffic Management Plan [REP4-174] additionally states, 'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the Primary Access Routes between the sites and the Strategic Road Network/Major Road Network'. This monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which can cause material effect can be identified and discussed with theRevision F]. <u>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/ Enviromental</u>		

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		<u>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-when, and National Highways, where appropriate, suitable steps to avoid or mitigate such effects.</u>		
3.10.52	Traffic Management	A detailed CTMP will be developed and approved by Norfolk County Council post consent under Requirement 4 of Schedule 3 of the 3.1 Draft Development Consent Order [REP4-037DCO [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 also be encouraged to use welfare facilities on-site rather than local facilities within Norfolk. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Suffolk will be significantly impacted. 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	Understood Position from Local Impact Report February 2026: <i>"Make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and"</i> NCC agreed this matter in a meeting in May 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site. 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 and will be managed through the enforcement procedure detailed in 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F].		
3.10.53	Traffic Management	The approach to using contingency routes in circumstances where traffic movements on the road network are disrupted or compromised (impacting the use of the agreed PARs and site access points) is detailed within 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F]. Contingency routes will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police. The Main Works Contractor(s) will also utilise the website OneNetwork and liaise with National Highways and Norfolk County Council on any other planned disruption. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to agreed.	<i>Understood Position from Local Impact Report February 2026:</i> <i>“Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.”</i> NCC agreed this matter in a meeting in May 2026, noting that OneNetwork is to be used, alongside liaison between the Main Works Contractor(s) and Norfolk County Council.	Agreed
3.10.54	Traffic Regulation Orders and Temporary Traffic	Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in 2.4 Traffic Regulation Order Plans [APP-025 to APP-032, REP5-025 and	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Regulation Orders	REP5-027], and set out in Schedule 13 of the 3.1 Draft Development Consent Order [REP4-037DCO [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. These are considered to be suitable and sufficient for the delivery of the Project.		
3.10.55	Proposed Construction Access on the A1066 via Diss and Thetford	<u>The Applicant has undertaken an assessment on the proposed construction access strategy through and around Diss. PAR 8 was chosen as an access route due to the construction corridor being aligned with the A140, and other Primary Access Routes being routed off the A140. The Applicant anticipates that there will be deliveries that need to access the construction compound south of Diss and those off PAR 6. If HGVs were only to be routed via Thetford (PAR 9), they would be subject to a 103 km diversion, with an additional journey time of 1 hour to 1 hour 40 minutes in the peak periods, which would route vehicles on busy parts of the network inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (January 2024) states that any mitigation (including re-routing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option,</u>	Under discussion—pending further meeting to be held between NCC and NG. Understood Position from Relevant Representation November 2025: "Traffic counts at Sites 6-9 (Diss / A 1066 corridor) confirm NCC's concern with any routing via Diss during both AM and PM peaks. The LRN junction mitigation for Sites 6-10 has been discussed with NCC but is not accepted; with the flows in Tables 7.51, 7.54, 7.56, 7.58, 7.62, the evidence suggests adverse effects from any traffic using the A1066 via Diss." "In Table 5.9 of the outline CTMP, clarification is sought on Site 1 regarding whether congestion signs will be only on County roads or also on the A47 (Trunk Road); additionally, Sites 6–15 reference access via Diss, a route that has not been confirmed."	Under Discussion <u>of agreed</u>

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		<u>would not comply with policy EN-1.</u> <u>Light goods vehicles are required to use the A1066 through Diss to access the haul road to the north of the River Waveney. There is a Main Site Compound to the south of Diss, where overhead line construction workers will be reporting for work, before travelling through Diss on the A1066 to access the haul road. If construction workers in LGVs are unable to travel along the A1066 through Diss, they will be required to drive an additional 1hr40minutes to access the haul road. This is unfeasible given that construction workers are expected to travel outside of peak hours. It is expected that these movements will be by crew vehicles carrying six, thus minimising the number of trips.</u> This is noted by the applicant. The modelling results within the 7.11 Transport Assessment [APP-333] indicate that there will be an impact on capacity at junction sites 6-9 should traffic be routed through Diss during the peak hours and off peak periods. The overall daily (7am-7pm) traffic and transport construction effect along PAR 8 (A1066/A1066 Victoria Road/A1066 Park Road/A1066 High Road) is considered overall as slight and the not significant, as outlined<u>The Applicant is currently proposing to route 100% of HGVs through Thetford in the network peak periods, and 50% of vehicles through Diss and 50% of vehicles through Thetford outside of these hours. This would remove construction traffic through Diss at peak times when there may be an interaction with a greater number of</u>		

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		<u>sensitive receptors along PAR 8 such as schools as detailed</u> within <u>6.16.A2 Environmental Statement Appendix 16.416.2 - Traffic and Transport Effects [APP-275Baseline Conditions [Revision B]</u>. The total number of construction vehicles travelling through Diss along Link PAR 8 is less than a 10% increase when compared to future baseline, and existing facilities for sensitive receptors are already provided such as footways, pedestrian crossings, and off-carriageway cycle tracks. Any effects to driver or public transport passenger delay at junctions will be temporary in nature and standard mitigation is proposed within <u>7.3 Outline Construction Traffic Management Plan [REP4-174]</u>. The Applicant is committed to working with Norfolk County Council on this matter as part of ongoing engagement.<u>Revision F]</u>. <u>The magnitude of impact and significance of effects for driver/public transport passenger delay for PAR 8 is moderate due to the small increase to future baseline traffic as a result of construction movements for the Project. Although mitigation is currently proposed to remove construction traffic through Diss at network peak periods, the magnitude of impact and significance of effects were retained as moderate due to the existing congestion at junctions along the A1066 through Diss as identified by the modelling presented within 7.11 Transport Assessment [APP-333]</u>. <u>Based on the modelling, there is no predicted</u>		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>step change in junction performance at junctions along the A1066 through Diss and the additional queues can be accommodated without blocking back to nearby junctions or impacting the wider network. While the construction traffic will add to existing delays and queues, the junctions are already subject to congestion meaning that the overall driver experience during construction would not materially change or create additional safety risks due to the minimal increase in traffic.</u> The Applicant anticipates that warning signage will be placed in appropriate locations to ensure the signs are visible to, and therefore warnings are heeded by, those who may be impacted. The Applicant will work with the affected local highway authorities to ensure the signs are placed in the correct locations. For Site 1, it is expected that signs will be located on the A47. With regard to Sites 6 to 15, an assessment of the impact of construction traffic has been completed on the roads through Diss and Thetford. Sites 6 to 15 are therefore included in Table 5.9 for completeness, as the Applicant's preference is for access through Diss. However, the Applicant will continue to discuss this matter with the Norfolk County Council. The Applicant recognises that a mutually agreed position is unlikely to be reached, and therefore proposes this matter be moved to Not Agreed.		
3.10.56	Proposed Traffic Regulation Order Closure of	National Grid have engaged with NCC around the proposed Primary Access Route (PAR) on Wymondham Road, west of Mulbarton. This route is shown as H01-A2 / H02-A1 on the 7.3	Updated Position from SOCG Review February 2026: NCC is now satisfied with the proposed	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Wymondham Road	Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section A [APP-313]. For the section of this route on Wymondham Road south of the B1113, a temporary mitigation scheme has been developed to facilitate use of the road by construction traffic. This is detailed in Section 5.9 of the 7.3 Outline Construction Traffic Management Plan Plan [REP4-174]Revision F. This includes a Traffic Regulation Order (TRO) proposed to close the impacted section for the duration of use by construction traffic – with public traffic to be diverted via the nearby Flordon Road – as set out in 2.4 Traffic Regulation Order Plans [APP-025 to APP-032, REP5-025 and REP5-027], and Schedule 13 of the 3.1 Draft Development Consent Order [REP4-037-DCO] Revision G: It is considered that this arrangement is suitable, and appropriate for the proposed construction access usage. The results of the AM peak hour modelling assessment identified that the Project construction movements at the junction would have a marginal increase in the right turn queue length compared with the predicted future baseline with committed development flows. As such the speed limit reduction is considered appropriate mitigation for this junction anticipated short-term two-week peak activity.	mitigation for right turning movements at the B1113/Wymondham Road junction. If any issues arise, these can be addressed as part of Section 5.9.10 of the CTMP.	
Abnormal Indivisible Load (AIL) Access				
3.10.57	Abnormal	The approach for Abnormal Indivisible Load (AIL)	NCC confirmed agreement in their response	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
	Indivisible Load (AIL) Access Approach	access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within Section 5 of the 7.3 Outline Construction Traffic Management Plan Plan [REP4-174]Revision F and further detailed within 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. A draft version of the AIL Access Strategy was shared with NCC in March 2025. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.	to the first iteration of the SoCG.	
3.10.58	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]. These have been developed following consultations with NCC. As part of these consultations, draft route information was shared in July 2024 and April 2025. National Grid will continue to engage with NCC as the proposed AIL access routes are developed further, including with respect to the ongoing structural investigations.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
3.10.59	Abnormal Indivisible Load (AIL) Structural Investigations	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]. National Grid have been consulting with NCC in relation to structures on	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by NCC in relation to structures on the draft routes shared have been considered in the development of the proposals shown in the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. Engagement with respect to impacted structures is anticipated to be ongoing in parallel with the Development Consent Order process. It is understood that any Approvals in Principle secured at the current stage of project development do not remove requirements for formal application ahead of any AIL movements undertaken by the Project. 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]. 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. 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		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		programming and operational arrangements to accommodate the movements with minimal impact on the network.		
3.10.60	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Indicative Highway Mitigation Plans within 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320, REP5-153. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 3.10.44), 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 [REP4-174Revision F, and Section 6 of the 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.	NCC confirmed agreement in their response to the first iteration of the SoCG.	Agreed
<u>Legal Agreements</u>				
3.10.61	<u>Legal Agreements</u>	<u>The Applicant is negotiating with Norfolk County Council a Framework Highways Agreement/Protective Provisions and expects the details of these to be agreed by the end of DCO examination, this matter is retained as Under</u>	<u>Norfolk County Council is negotiating with the Applicant a Framework Highways Agreement/Protective Provisions and expects the details of these to be agreed by the end of DCO examination, this matter is retained as</u>	<u>Under discussion</u>

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>Discussion.</u>	<u>Under Discussion.</u>	

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	Norfolk County Council's Position	Status
PRoW Assessment Chapter				
3.11.1	PRoW Separate Chapter	As per the Scoping Opinion received from the Planning Inspectorate, National Grid has not included a separate PRoW chapter in the Environmental Statement (ES). A standalone PRoW chapter has not been included in the Environmental Statement (ES) as PRoW related matters are far-reaching and impact multiple aspects of the Project. It was decided that PRoW issues are better introduced and reviewed throughout the ES with the context of other topics, issues and proposals. Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs will be assessed within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]<u>Revision B</u>. This approach has been discussed with NCC at several meetings. Note that 7.6 Outline Public Rights of Way Management Plan [REP4-178]<u>Revision D</u> has	NCC requested that a separate PRoW chapter should be provided in the ES. NCC agreed to the principle of the inclusion of the Outline Public Rights of Way Management Plan instead of a PRoW standalone chapter in the ES during a meeting in May 2026.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		been prepared to set out the proposed approach to the management of PRowWs during construction of the Project.		
3.11.2	Types of PRowW	Types of PRowW intended to be considered as part of the Management Strategy were shared with NCC within Section 2.1 of the PRowW Methodology Statement document in April 2025. This list is considered to suitable, and no additional PRowW types are required to be captured. The PRowW types intended to be considered are: • Formally designated PRowWs (footways, bridleways, restricted byways, and byways open to all traffic) • Permissive paths • Open access land • Cycle tracks, including the National Cycle Network • Other routes with public access. This is set out in Section 2.4 of the Outline PRowW Management Plan. NCC comments received on 18/06/25 regarding the draft PRowW Management Plan have been addressed and incorporated as appropriate into 7.6 Outline PRowW Management Plan [REP4-178]Revision D submitted as part of the DCO Application, specifically in the updated Section 2.4. The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not	NCC refers to comments raised on the draft PRowW Management Plan shared in May 2025. NCC raised comments on Section 2.4.1 of the draft PRowW Management Plan: “<i>Surveys undertaken during the spring to be confirmed in the ES</i>”. NCC agreed this matter in a meeting in May 2026, acknowledging that the comments raised in May 2025 have been captured in the updated draft PRowW Management Plan.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Agreed.		
3.11.3	Proposed Management Regime Approach	The intended approach to management regimes to be considered as part of the Management Strategy were shared with NCC within Section 2.4 of the PRow Methodology Statement document in April 2025. This established the following hierarchy of management measures: • PRowS to be kept upon existing alignments as a first preference, utilising management measures if required. • Where maintaining existing PRow alignments is not practicable, diversions along the shortest suitable route will be proposed. • Where no suitable diversion routes are identified, PRow closures will be considered as a last resort. This is set out in Section 3 of 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D] NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D] submitted as part of the DCO Application; these can be seen in the updated Section 4. The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.	NCC refers to comments raised on the draft PRow Management Plan shared in May 2025. NCC raised comments on sections 3.1.2 and 3.1.6 of the draft PRow Management Plan: <i>"Permanent stopping up would this not require a diversion or alternative route."</i> NCC agreed this matter in a meeting in May 2026, acknowledging that the comments raised in May 2025 have been captured in the updated draft PRow Management Plan.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
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, and REP4-019]. Details of proposed management measures for each impacted route are shown in Section 4 of 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D]. These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.11.3) set out above. NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D] submitted as part of the DCO Application; these can be seen in the updated Section 6.	NCC refers to comments raised on the draft PRow Management Plan shared in May 2025. NCC raised comments on section 5.1.1 of the draft PRow Management Plan: “<i>all footpath's to be 1.5m minimum whether located at an field edge or not</i>”, and on section 5.2.1 of the draft PRow Management Plan: “<i>condition surveys to be carried out with PRow or highway officers</i>”.	Agreed
3.11.5	Reinstatement Approach	All PRow's impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with NCC PRow Officers as well as impacted landowner(s). This is set out in Section 6 of the 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D]. NCC comments received on 18/06/25 regarding the Draft PRow Management Plan have been addressed and incorporated as appropriate into the 7.6 Outline Public Rights of Way	NCC refers to comments raised on the draft PRow Management Plan shared in May 2025.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Management Plan [REP4-178Revision D] submitted as part of the DCO Application.		
3.11.6	PRoW Surveys	Within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] the rationale for selection of those PRoWs to be surveyed is provided. The list of PRoWs to be surveyed included routes likely to have a high number of users and extensive connectivity and/or social significance. The list of sites was shared with the local authorities in July 2024 and their feedback taken into consideration. At the time of arranging the PRoW surveys, the PRoWs that would be subject to diversion were not known, and therefore, Ashwellthorpe FP5, Forncett FP25 and FP26, and Roydon FP2 and FP4 were not surveyed. The number of users has not been a criterion for defining the sensitivity of PRoWs or the significance of effect, as agreed in 6.19 Scoping Report - including appendices B to K [APP-296] for pedestrian, cyclist and horse-rider delay. Although user surveys were not undertaken for the above mentioned PRoWs, they were all subject to review and assessment within both the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271Revision B] and 7.11 Transport Assessment [APP-333]. This took into consideration the proposed management approach and timescales for these PRoWs as set out in 7.6 Outline Public Rights of Way Management Plan [REP4-178Revision D].	Understood Position from Relevant Representation November 2025: <i>"The Traffic and Transport Baseline Conditions appendix of the Environmental Statement currently only references Footpath 14 in Norfolk in relation to public rights of way ("PRoW"). This is an incomplete representation of the PRoW network affected by the proposed development. In addition to FP14, the following footpaths should be identified and assessed within the ES: Ashwellthorpe FP5; Forncett FP25 and FP26; and Roydon FP2 and FP4. These routes are of local importance and may be directly or indirectly impacted by construction activities."</i> NCC agreed this matter in a meeting in May 2026, acknowledging that the comments raised in May 2025 have been captured in the updated draft PRoW Management Plan.	Agreed

3.12 Cumulative Effects

3.12.1 NCC do not wish to raise any matters in relation to cumulative effects which are not already considered under topic specific sections above.

~~All matters relating to Cumulative Effects remain under discussion pending Norfolk County Council's review and assessment of the impacts of the project itself.~~

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

ID	Matter	National Grid's Position	Norfolk 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 [APP-126] and Section 17.2 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		Agree
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 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects		Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
[APP-281].				
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 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.4 of 6.17 Environmental Statement Chapter 17 -- Cumulative Effects [APP-281] . The key parameters and assumptions presented are considered appropriate.		Agreed
EIA – Baseline Conditions				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented in Section 17.5 of 6.17 Environmental Statement Chapter 17 -- Cumulative Effects [APP-281] . The baseline conditions and receptors presented are considered appropriate.		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 Environmental Statement Chapters 6 to 16 [APP-138 to APP-280] . Embedded mitigation measures, designed as an inherent part of the Project relevant to Cumulative Effects, are set out in Environmental Statement Chapters 6 to 16 [APP-138 to APP-280] . Embedded		Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid await further review of this matter from NCC following further comment requested in May 2026.		
3.12.8	Standard mitigation	The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within Environmental Statement Chapters 6 to 16 [APP-138 to APP-280]. Standard mitigation measures to reduce potential effects during construction are summarised in Environmental Statement Chapters 6 to 16 [APP-138 to APP-280] and set out in 7.2 Outline Code of Construction Practice [REP4-164]. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid await further review of this matter from NCC following further comment requested in May 2026.		Under discussion
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 [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163]. Additional mitigation is considered		Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid await further review of this matter from NCC following further comment requested in May 2026.		
EIA – Assessment Conclusions				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] 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.		Agree
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 17.7 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] and in 6.17.1 Environmental Statement Chapter 17 – Cumulative Effects – Response Update [REP4-163] . The assessment of effects during operation (and maintenance) presented is considered appropriate.		Agree
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
3.12.12	Outline CoCP	7.2 Outline Code of Construction Practice [REP4-164] includes all relevant construction-related mitigation measures specified in 6.17 Environmental Statement Chapter 17 –		Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Cumulative Effects [APP-281] and is appropriate for managing construction impacts from the Project. Meeting held in October 2024 to agree on the structure for the Outline CoCP. Meeting held in March 2025 to discuss the second iteration of the Outline CoCP. A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.		
	Other matters as required			

3.13 Development Consent Order

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

- 3.13.1 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 [REP4-037] DCO** .
- 3.13.2 This table contains the views of the Applicant and NCC 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.
- 3.13.3 The Applicant and NCC 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 3.12 Matters Agreed, Not Agreed or Under Discussion in relation to Development Consent Order

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
3.13.1	DCO Requirements – Construction management plans	The Applicant has removed the reference to “other discharging authority” in Requirement 4 (Construction management plans) to 3.1 Draft DCO (Revision D) [REP4-037 [REP5-060] following deletion of the definition of discharging authority in Requirement 1 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 decision following consultation and that the decision does not rest with the consultee. The Applicant proposes this matter is agreed.<u>The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.</u>	NCC has requested a consequential change as a result of disambiguating the reference to “relevant planning authorities” in Requirement 4 (Construction management plans). This change resolves the ambiguity of which local planning authority is the “relevant planning authority” and further reduces ambiguity by removing references to any “other discharging authority as may be appropriate”. This is enabled by introducing a new paragraph which sets out a relevant consultee for each plan and reserving the role of discharging authority for the relevant district planning authority	Agreed
3.13.2	DCO Requirements - Archaeology	The Applicant has removed the reference to “discharging authority” in Requirement 5 (Archaeology) to 3.1 Draft DCO (Revision D) [REP4-037 [REP5-060] following deletion of the definition of discharging authority in Requirement 1 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 considers that through ongoing engagement between the parties, this matter can be moved to agreed<u>a mutually agreed position has been reached, and therefore the matter is</u>	NCC has requested a consequential change as a result of disambiguating the reference to “relevant planning authorities” in Requirement 5 (Archaeology). This change would reduce ambiguity by making the relevant district planning authority the discharging authority in all cases, including those in which Historic England are relevant. The proposed drafting requires consultation with the relevant county planning authority, because county planning authorities host specialist archaeological officers and maintain the historic environment record.	Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		recorded as Agreed.	NCC presume that Historic England would be relevant in cases affecting scheduled ancient monuments, but this isn't clear on the face of the order. NCC would ask the applicant to consider whether this should be set out explicitly. NCC's proposed change would make Historic England a consultee rather than a discharging authority to simplify discharging arrangements. If the applicant would prefer to retain Historic England as a discharging authority in certain circumstances, NCC would request that the applicant propose an amendment which would make clear the circumstances in which Historic England are the discharging authority and which makes county planning authorities mandatory consultees.	
3.13.3	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] . Requirement 7 (Construction Hours) of the 3.1 Draft DCO (Revision D) [REP4-037 [REP5-060] provides that the proposed core working hours are 07:00–19:00 Monday to Friday and 07:00–17:00 on Saturdays, Sundays, Bank Holidays and other Public Holidays, unless alternative hours are approved by the relevant	12.2 NCC asks that construction activities are limited to 07:00 to 13:00 on Saturdays and no activities taking place on Sundays and bank holidays, except for special operations agreed in advance with NCC as the local highway authority. 12.3 Construction working patterns have a direct impact on network peaks so it is important that start up and close down activities are included in the controlled construction working hours.	Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		planning authority. 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 construction working hours set out in 3.1 Draft DCO (Revision D) [REP4-037] [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		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Code of Construction Practice [REP4-164]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 materially harm the deliverability of this critical national priority project. 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]Revision B assessed the impact to sensitive receptors from noise and vibration during the construction phase, and based the assessment on the core working hours proposed, which would include start-up and close-down activities taking place up to one hour either side of the core hours, and activities which can take place outside the core working hours. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice [REP4-164]Revision G, significant effects from noise and vibration during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft DCO (Revision D)- [REP4-037][REP5-060] within the final Code of		

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		Construction Practice. The Applicant therefore considers the provision for start-up and close-down activities and activities that can commence outside core working hours 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 [REP4-164 Revision G]. The Applicant considers it is unlikely that the two parties will find recognises that a mutually agreed position has not been reached, and therefore suggest this the matter is moved to recorded as Not Agreed.		
3.13.4	DCO Requirements – Additional requirements (Surface water drainage management plan)	Commitment GG22 in 7.2 Outline Code of Construction Practice [REP4-164 Revision G] secures that the Main Works Contractor(s) would will prepare a Surface Water Management Plan. This plan would will be substantially in accordance with 8.2 Drainage Strategy DCO [REP4-186 Revision C], submitted at Deadline 1 and updated at Deadline 4, 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 Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed. The drainage mitigation	A request is made for the preparation of a surface water drainage or management plan. Note that this would require the applicant to produce an outline construction surface water drainage strategy before the end of the examination.	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		<u>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].</u>		
3.13.5	DCO Requirements – Additional requirements <u>(Employment and skills plan)</u>	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 host authorities and submitted 8.13 Outline Employment and Skills Plan [Revision A-REP5-215] into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement in an update to 3.1 Draft DCO (Revision D)-[REP4-037][REP5-060]. <u>The Applicant considers that a mutually agreed position has been reached, and therefore the matter is recorded as Agreed.</u>	NCC's request to require an employment and skills plan. Note that this would require the applicant to produce an outline employment and skills plan before the end of the examination.	Under discussion <u>Agreed</u>
3.13.6	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)	Schedule 4 (discharge of requirements) The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice Note Fifteen: drafting Development Consent Orders¹¹, which is 42 days or,	Not Agreed

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		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 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 DCO (Revision-D) [REP4-037 [REP5-060] to extend the 25 business day period for the discharge of Requirements by agreement in writing between	preferably, 56 days accounting for the unusually high volume of NSIPs being handled in Norfolk. NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address'12) to be unconvincing given that longer periods are well preceded for other projects which also meet an urgent need as defined by NPS EN-1.	

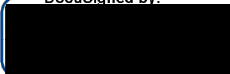
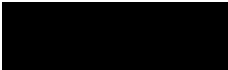
ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. <u>The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed.</u>		
Other matters as required				

3.14 Other Matters

4. Confirmation of Agreement

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

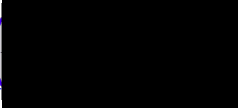
Signed for and on behalf of National Grid:

DocuSigned by:
 

Date:

20/07/2026

Signed for and on behalf of Norfolk County Council:

Date:

20 July 2026

Abbreviations

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

ZTV

Zone of Theoretical Visibility

Appendix A.

Draft DCO wording

Appendix A

Draft DCO wording

A.1.1 This table contains the views of the Applicant and NCC 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.

A.1.2 The Applicant and NCC 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 ~~A1~~A.1 Norfolk County Council – Comments on the draft DCO

ID	Matter	National Grid's Position	Norfolk County Council's Position			Status
			Insertion/deletion or amendment	Proposed change	Explanation of change	
1.	DCO Wording – Relevant Planning Authority	The Applicant has considered the feedback received from the host authorities, including the detailed comments of Norfolk County Council in its Local Impact Report (LIR) [REP1-173], on the approach to defining the 'relevant planning authority' in 3.1 Draft Development Consent Order DCO [REP5-060] (the 'dDCO'). The definition in the dDCO as submitted is common across a number of made development consent orders, including the National Grid (Bramford to	Delete in paragraph (1) of article 2. Insert after definition of "provisional advance authorisation" in paragraph (1) of article 2.	<u>"relevant county planning authority" means, in any given provision of this Order, the county planning authority for the area to which the provision relates;</u> <u>"relevant district planning authority" means, in any given provision of this Order, the district planning authority for the</u>	The meaning of "relevant planning authority" in the requirement is ambiguous. It is defined in article (1) as meaning "in any given provision of this Order, the local planning authority to which the provision relates". Section 235 of the Planning Act 2008 gives "local planning authority" the same meaning as in the Town and Country Planning Act 1990. Section 1 of the Town and Country	Agreed

ID Matter	National Grid's Position	Norfolk County Council's Position	Status
	Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. However, the Applicant recognises that the circumstances of each made DCO may differ and, in this case, to limit any scope for ambiguity proposes to replace the existing definition of 'relevant planning authority' with a new two-limb definition as follows in Article 2 (Interpretation) of 3.1 Draft Development Consent Order [Revision- CREP5-060]: "relevant planning authority" means, in any given provision of this Order— (a) for an area to which the provision relates in respect of which there is both a district planning authority and a county planning authority for the purposes of Part I (Planning Authorities) of the 1990 Act, the district planning authority; and (b) for an area to which the provision	<u>area to which the provision relates;</u> Planning Act 1990 states that references in the planning Acts to a local planning authority in relation to a non-metropolitan county shall be construed, subject to any express provision to the contrary, as references to both the county planning authority and the district planning authorities. Because there is no express provision to the contrary in either the Planning Act 2008 or the draft DCO, the term "relevant planning authority" refers to both types of planning authority. NCC considers that this is imprecise and unhelpful and that the draft DCO should specify which local planning authority is meant in each instance.	

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		relates in respect of which there is only one local planning authority for the purposes of that Part, that one local planning authority, or any successor exercising its functions as local planning authority for the purposes of that Part;' The Applicant also proposes to insert a new definition of 'relevant county planning authority' as follows: "relevant county planning authority" means, in any given provision of this Order, the county planning authority (which has the meaning given in Part I (Planning Authorities) of the 1990 Act) for the area to which the provision relates or any successor exercising its functions as local planning authority for the purposes of that Part;' This approach: (i) removes any ambiguity Norfolk County Council has identified, by making clear that in a two-tier area the district planning authority is the primary discharging body; (ii) retains a separate		

ID Matter	National Grid's Position	Norfolk County Council's Position	Status
	'relevant county planning authority' definition, enabling requirements to specify county-level consultees expressly; and (iii) avoids complications for any other authorities within the Order Limits that are, or may become, unitary or metropolitan district authorities, for whom Norfolk County Council's proposed 'relevant district planning authority' definition would not be appropriate. Limb (b) of the Applicant's definition captures those single authority scenarios without requiring an exhaustive schedule of which councils are unitary, which would be unusual and unwieldy on the face of the DCO. The general principle the Applicant would apply is that: (i) the 'relevant planning authority' (per the new two-limb definition) would be the primary discharging body throughout the Requirements; and (ii) 'relevant county planning authority' will be named		

ID	Matter	National Grid's Position	Norfolk County Council's Position			Status
		expressly as a consultee where county-level expertise is relevant (e.g. archaeology, flood risk, construction surface water drainage), with Requirements amended to read 'following consultation with the relevant county planning authority'. A number of consequential changes were made throughout the 3.1 Draft Development Consent Order DCO [REP5-060].				
2.	DCO Wording –Protective Provisions (Highways)	The Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [Revision C] [REP5-060] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions and, in the alternative, the provisions of a draft framework agreement. The Applicant will continue has continued to engage with the authority throughout the Examination process and therefore at this stage it	Insertion/deletion or amendment	Proposed change	Explanation of change	Under discussion
			Amend paragraph (1) of article 11.	(1) The undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter upon so much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may <u>subject to</u>	As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 11(1) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally interfere with our ability to perform our functions as street authority. The reference to the	

ID	Matter	National Grid's Position	Norfolk County Council's Position			Status
		does not consider NCC's proposed amendments to the draft DCO to be necessary.		the consent of the street authority <u>which may attach reasonable conditions to any consent—</u> [...]	street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).	
			<u>NCC is hopeful that protective provisions can be agreed. In the event that protective provisions are not agreed, NCC would maintain its request for consent to be required.</u>			
3.	DCO Wording – Reasonable Conditions	The Applicant notes NCC's request for consistency across those articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering. <u>However, the Applicant does not consider the proposed updates to the 3.2 amendments to be necessary and has not updated the 3.1 Draft Development Consent Order.</u> <u>[REP5-060].</u>	Insertion/deletion or amendment	Proposed change	Explanation of change	Under discussion
			Amend paragraph (2) of article 11.	(2) Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, which consent must not be unreasonably withheld or delayed and to which consent the street authority may attach reasonable conditions, the undertaker may, for	The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b) but modified to fit the grammatical context.	

ID	Matter	National Grid's Position	Norfolk County Council's Position			Status
			the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at paragraph (1)(a) to (j) and paragraph (3) of article 8 (application of the 1990 Act) applies. <u>NCC maintains its request and note that no detailed rationale has been provided as to why our proposed drafting has not been adopted.</u>			
4.	DCO Wording – Consent of Street Authority	The Applicant notes NCC's request for consistency across these articles which require the Applicant to obtain the relevant street or highway authority's consent before carrying out works on streets on otherwise identified in the Schedules to the draft Development Consent Order and is considering the proposed updates to the 3.2 Draft	Insertion/deletion or amendment Amend paragraph (4) of article 14. (<i>cont.</i>)	Proposed change (4) The powers conferred by paragraphs (1) and (2) may not be exercised without the consent of the street authority, which may attach reasonable conditions to any	Explanation of change As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 14(1) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers which could unilaterally	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position			Status
		Development Consent-Order has incorporated draft protective provisions into 3.1 Draft DCO [REP5-060] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions and, in the alternative, the provisions of a draft framework agreement. The Applicant has continued to engage with the authority throughout the Examination process and does not consider NCC's proposed amendments to the draft DCO to be necessary.		consent (such consent not to be unreasonably withheld or delayed).	interfere with our ability to perform our functions as street authority. The reference to the street authority's ability to attach reasonable conditions is proposed to make this implicit ability explicit, following the language of current article 16(5)(b).	
			<u>NCC is hopeful that protective provisions can be agreed. In the event that protective provisions are not agreed, NCC would maintain its request for consent to be required.</u>			
5.	DCO Wording – Protective Provisions (Highways)	The Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent-Order [Revision C-DCO [REP5-060] ('the draft DCO') and has sought engagement with the relevant highway authorities on these provisions and, in the alternative, the provisions of a draft framework agreement. The Applicant will continue <u>has continued</u> to engage with the	Insertion/deletion or amendment Amend paragraph (5) of article 16.	Proposed change (5) The undertaker must not temporarily close, alter or divert— (a) any street or public right of way specified as mentioned in paragraph (4); or (b) any other street or public right of	Explanation of change As set out in our relevant representation, without a suitable highways side agreement or protective provisions, article 16(5) should be subject to the consent of the street authority. NCC cannot accept the grant of powers to undertakers	Under discussion

ID	Matter	National Grid's Position	Norfolk County Council's Position	Status
		authority throughout the Examination process and therefore at this stage it does not consider NCC's proposed amendments to the draft DCO to be necessary.	way, without the consent of the street authority (such consent not to be unreasonably withheld or delayed) which may attach reasonable conditions to any consent. which could unilaterally interfere with our ability to perform our functions as street authority. This change would mean that both (a) and (b) are subject to consent of the street authority. <u>NCC is hopeful that protective provisions can be agreed. In the event that protective provisions are not agreed, NCC would maintain its request for consent to be required.</u>	
6.	DCO Wording – Closure of PRoW	What might constitute a “reasonable time” will be specific to the particular facts in each instance, therefore, a definition or clarification of what this might be in the draft DCO would be impractical and potentially imprecise. Information regarding the time for which PRoWs will be temporarily closed and diverted is contained within the 7.6 Outline PReWPublic Rights of Way Management Plan [REP4-178Revision D]. In summary, the strategy is to	Article 16 (temporary closure of streets and public rights of way) 3.6 NCC considers that clarification is needed as to what might constitute a ‘reasonable time’ for the purpose of paragraph (1) of article 16, which enables the undertaker to ‘temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time—(a) divert the traffic from the street or public right of way; and (b) subject to paragraph (3), prevent all persons from passing along the street or public right of way.’ (emphasis added). 3.7 Paragraph (5)(b) refers to the street authority’s ability to attach reasonable conditions to consents under article 16. For the avoidance of doubt, NCC considers that other provisions which provide for consents should also explicitly state that reasonable conditions may be applied (notwithstanding the earlier point that NCC may not lawfully behave unreasonably in any case). 3.8 In addition, the Council considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part	Under discussion <u>Agreed</u>

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		maintain access along PRow at all times throughout the construction period, either through managing access along them on their existing alignment, or through provision of appropriate diversions. The approach proposed for each affected PRow, and the indicative timescales involved, are detailed in Section 8 of the7.6 Outline PRow Public Rights of Way Management Plan [REP4-178 Revision D] and have been kept as short as possible within the constraints of the works being carried out that will affect them. The Applicant's Main Works Contractor will further develop the construction programme during detailed design, and refined durations and closure dates will be communicated to Norfolk County Council as part of ongoing engagement. The Applicant considers that	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 is temporarily stopped up, altered or diverted.After consideration of National Grid's position, NCC is content to agree this point.	

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	the safeguards sought by Norfolk County Council in relation to both highway and PRow diversions are already secured through the 3.1 Draft Development Consent Order [Revision C] DCO [REP5-060] and its relevant management plans. Under Requirement 4 of the 3.1 Draft Development Consent Order [Revision C] DCO [REP5-060], the final PRow Management Plan and Construction Traffic Management Plan must be submitted to, and approved by, the relevant Local Highway Authority before works commence on any stage of the project. This approval process will include agreement of the details, sequencing and suitability of any temporary diversions affecting streets or PRowS. For highways, the 7.3 Outline Construction Traffic Management Plan [REP4-174Revision F] commits to coordinating all temporary traffic management with the		

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	relevant Local Highway Authorities through the use of the applicable Permit Schemes and/or Traffic Regulation Order or Temporary Traffic Regulation Order processes. These processes require diversion routes to be identified, appropriate and agreed with the highway authority in advance, thereby ensuring that suitable diversion arrangements are secured prior to any closure taking effect. For PRowWs, the 7.6 Outline PRowPublic Rights of Way Management Plan [REP4-178Revision D] commits to advance notification to the LHA PRow Officer for all temporary closures, identification of diversion routes where required, and provision of appropriate signage and management measures. These provisions ensure that diversion arrangements must be agreed and ready to implement before any		

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	closure is enacted. The 7.6 Outline PRoWPublic <u>Rights of Way</u> Management Plan [REP4-178Revision D] also commits to reinstatement being completed to the reasonable satisfaction of the relevant highway authority's PRoW Officer. The inclusion in paragraph 5(b) of Article 16 of an express ability to attach conditions to a consent is because the streets or PRoWs referred to in that paragraph are not already identified in Schedule 8, hence the ability to attach conditions allows the relevant authority to bring any consents to these streets or PRoWs in line with the details for those agreed under the approvals processes referred to above. Taken together, the requirement for the relevant street authority's approval of the final Plans, the statutory procedures governing highway closures, and the commitments within the		

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	outline Plans ensure that no PRow or highway is temporarily stopped up, altered or diverted until suitable diversion arrangements have been agreed and can be made available. The Applicant therefore considers that Article 16 already provides adequate control and that no amendment is necessary.		
7. DCO Wording – Protective Provisions – <u>Highways</u>	The Applicant will-continue <u>has continued</u> to engage with relevant stakeholders on matters including the draft protective provisions and, in the case of highways matters, the draft framework agreement. <u>No comments have been received to date (Deadline 5) from NCC on the highways framework agreement.</u>	Schedule 16 (protective provisions) 3.11 NCC notes the inclusion of protective provisions for the protection of drainage and flood authorities (in part 3) and for the protection of the highway authorities (in part 4). Neither set of protective provisions have been agreed with NCC. 3.12 In the case of the flood authority provisions, negotiations have been ongoing with the developer since August 2025. In relation to the highway authority provisions, NCC would strongly prefer for all local highway authorities to agree a framework highways agreement with the applicant which allows for more detailed agreements to be made in relation to specific works. <u>NCC is hopeful that protective provisions can be agreed for highways authorities.</u>	Under discussion
<u>DCO Wording – Protective Provisions – Flood authorities</u>	<u>The Applicant has continued to engage with relevant stakeholders on matters including the draft protective provisions.</u>	<u>NCC has agreed protective provisions for flood authorities and is hopeful that protective provisions.</u>	<u>Agreed</u>

4. Confirmation of Agreement

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

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Norfolk County Council:

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Date:

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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
NCC	Norfolk County Council
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence

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<u>Add</u>	582
Delete	556
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<u>Move To</u>	0
<u>Table Insert</u>	21
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Table moves from	0
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Embedded Excel	0
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